

Summary of Comments Received
State Child Care Plan (Preprint) for the FY 2008-2009 Biennium

The Administration for Children and Families (ACF) announced its intention to make changes to the State Child Care Plan (Preprint) for the FY 2008-2009 Biennium (ACF Form-118) in the Federal Register on October 16, 2006, and solicited comments from the public. 71 FR 60730. Three comments were received, two from State Child Care Administrators and one from an advocate for State and local governments administering human service programs.

Comments of a technical nature were accepted and are reflected in the most recent version of the Preprint. The attached chart indicates substantive public comments to the October 16 Federal Register announcement and ACF's response to those comments.

ACF has taken this opportunity to make several technical changes to the Preprint and Guidance. They are as follows:

In the Section 2.1.1 chart and accompanying guidance, added emergency preparedness officials or experts to the list of entities with which States and Territories may consult and coordinate. States and Territories are also asked to provide their emergency preparedness plan, if they have one, to their State Plans as an attachment.

In guidance accompanying Section 3.5.3, updated the poverty guidelines to the now-available 2007 HHS Poverty Guidelines.

In Section 5.1.1, States are asked to provide actual results in addition to expected results for ongoing activities related to infant and toddler care and school-age care and resource and referral services as well as the special earmark for quality activities.

In the Section 5.1.3 chart, activities that increase parental choice, other activities that improve the quality of child care, and other activities that improve the availability of child care are split in to three lines. States are also asked to describe other activities that improve the quality and / or availability of child care.

In Section 5.1.4, States who have not conducted an evaluation of their quality activities are asked to describe how such activities will be evaluated.

Part or Section of the Plan	Comment	Response
3.1.1	<p>The revised Preprint requires that each State submit a copy of their eligibility worker’s manual, policy handbook, or other written guidelines for administering the child care subsidy program, as well as provide the Web site address where this information may be accessed. This is unnecessarily burdensome. Many States have integrated program manuals that include policies for many programs: Food Stamps, Child Care, TANF, Adult Protective Services, LIEAP, etc. Several States also have no paper manual. All policies and regulations are available to staff and the public on the internet. Printing a paper copy of the manual to attach to the State Plan for child care is burdensome as it would have to be printed from the internet which would not result in a document that was formatted for print. The electronic manual is also updated regularly, so the paper version attached to the State Plan would soon be outdated.</p> <p>We recommend that States and Territories only be required to submit a paper version of eligibility and policy documents if these documents are not accessible on the internet.</p>	<p>We agree and have amended the Preprint to provide: “If these materials are available on the web, the State may provide the appropriate Web site address in lieu of attaching hard copies to the Plan.”</p>
3.4.1	<p>Section 3.4.1 of the revised Preprint includes a table asking States to indicate populations for which they guarantee or give priority for subsidies. While this table simplifies the reporting of State eligibility priorities, it does not provide any space to indicate priorities for subsets of the listed populations; to</p>	<p>The chart provided in 3.4.1 is designed to provide for a compilation of data that is consistent across all States and Territories by using check boxes for replies. States and Territories may still use Sections 3.4.2, 3.4.3, and 3.4.4 to indicate priorities for subsets of the listed populations; to provide State-specific</p>

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	<p>provide a State-specific definition of a population; or to offer other further explanation of answers.</p> <p>We recommend that an additional column or other space for comments be added to the table at Section 3.4.1.</p>	<p>definitions of a population; and to offer other further explanation of answers.</p> <p>We also take this opportunity to amend 3.4.2 to delete the “(c) other” option, because States and Territories have the opportunity to discuss other priority rules in question 3.4.4 and this option in 3.4.2 is redundant and confusing.</p>
4.1.4	<p>A new question in the Preprint asks if the State conducts outreach to eligible families with limited English proficiency (LEP). We believe that this question is too narrow to adequately capture States’ and Territories’ efforts to improve access to subsidies for LEP families. Many States do not conduct outreach due to limits on funding available to serve additional families.</p> <p>A follow-up question for States and Territories that answer “yes” to the question regarding outreach to LEP families asks for a description of how the State or Territory reaches out to and provides services to LEP families, including how the State or Territory overcomes language barriers with families and providers. Many States and Territories that do not conduct outreach have strategies for reducing language and other barriers for LEP families applying for subsidies. However, this information will not be captured in the Plans of those States and Territories that answer “no” to the first question.</p> <p>We recommend that the Preprint more broadly ask States and Territories to describe their efforts to promote access</p>	<p>We agree and have amended 4.1.4 to allow for States and Territories who are doing more for LEP families than “outreach” to describe those activities. 4.1.4 now asks:</p> <p>4.1.4 Does the State conduct activities aimed at families with limited English proficiency to promote access to child care subsidies and reduce barriers to receiving subsidies and accessing child care services?</p> <p><input type="checkbox"/> Yes. Describe these activities, including how the State overcomes language barriers with families and providers.</p> <p><input type="checkbox"/> No.</p> <p>We decline to remove the question from section 4.1 because we continue to believe that it is the most appropriate place for it. We note that any quality activities involving access to child care for LEP families should be described in Section 5.1 regarding quality set-asides and earmarks and have amended the guidance to reflect this.</p>

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	<p>to child care subsidies; reduce barriers to receiving subsidies and accessing child care services; and improve the quality of care for LEP families. We also think that this question should be included in Part 1 of the State Plan, administration, rather than as part of Section 4.1, which relates to the application process and parental choice.</p>	
5.2.1	<p>Section 5.2.1 asks States to indicate the status of early learning guidelines for children age three to five. Many States are developing guidelines for a broader age range than three to five. In particular, many States are addressing early learning from birth to age five in one set of guidelines and plans. This section would more accurately capture the work being done if it allowed States to indicate the age range for which they are developing plans.</p> <p>We recommend that in the first paragraph of question 5.2.1, States should be asked to indicate the ages included in their early learning guidelines.</p>	<p>We decline to make the requested change because the Good Start, Grow Smart (GSGS) initiative specifically focuses on activities related to three-to-five-year-olds, making it important to keep this question specific to this age group. In addition, because one of the key components of the GSGS initiative is coordination with other early learning programs (e.g., State prekindergarten and Head Start programs) that specifically focus on this same age group, it is important to have consistency in focus on the same ages across these programs. Finally, because our GPRA goal related to school readiness focuses on children aged three-to five, it is important to maintain this clarity and consistency on this age group.</p> <p>For States that have expanded their early learning activities to additional age groups, separate questions are included following this initial question. We have revised the Preprint to make this more clear.</p>