

From: InfoCollection (ACF)
Sent: Monday, November 08, 2010 2:53 PM
To: Ntim, Valentina (ACF)
Subject: FW: Comments on proposed FY12-14 CCDF Plan Preprint

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From: Carol Scott [mailto:carol@mo.childcareaware.org]
Sent: Monday, November 08, 2010 12:34 PM
To: InfoCollection (ACF)
Subject: Comments on proposed FY12-14 CCDF Plan Preprint

Dear Shannon, Joan and others involved in development of the CCDF Plan document,

I want to start by saying congratulations on this radical departure from past state planning guidance! The greater emphasis on quality and data is bold, and has been needed for a long time. This plan really sets a refreshing new tone from the federal level about the importance of quality (I greatly appreciate the elements of a QRIS as the framework in section 3.3), which should positively influence the way in which CCDF monies are invested at the state level for the long term.

I was particularly impressed by the reference to “making *systematic* investments” [emphasis mine] for quality improvement. I recognize that defining and measuring when investments are “systematic” is not a simple task, and I believe that the repeated pattern of requests for data, performance measurement, evaluation and goals is an effective approach to a future definition. While I am impatient for the day when there is a unified approach to measurement of performance, I understand the need to step gradually into these waters by first gathering information on what exists before mandating a single set of data from every state.

I am glad that the structure of the plan enables easily reporting roles for CCR&R state networks (where they exist), as in 3.3.5, and hope you will consider *requiring* partnership with them (where they exist) in specific circumstances. For example, in 2.6.4, there could be a requirement to consider any available CCR&R data on parent fees when determining Market Rates, especially in areas of the state with low return rates on the state survey.

Other specific items I support include:

- 3.1.2.c. and 3.1.2.d. – asking these questions provides states that have minimal licensing rules some leverage for changing them, and enables national data on the “state” of these rules.
- 3.1.3.a. – inclusion of the need to report on the existence of specific requirements for fire and building inspection, inaccessibility of toxic substances, safe sleep, and transportation provides states without these requirements some leverage for adopting them, and enables national data on the “state” of these requirements.
- 3.1.3.c. – inclusion of the need to report on availability of specific health and safety training topics provides states that have minimal training requirements some leverage for changing them, and enables national data on the “state” of these requirement. I suggest that, in this period of collecting all the ways in which states are measuring performance, the Bureau look for any data on the level of investment in provision of such training, and the some cost effectiveness data on various delivery mechanisms.

Thank you again for this courageous new direction for the CCDF. I eagerly await the changes we will see because of your leadership,

Carol Scott

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