

Draft for Public Comment
Child Care and Development Fund Plan Preprint FFY 2012-2013
NACCRRA Comments

Submitted by Linda K. Smith, Executive Director
November 23, 2010

General Comments

The National Association of Child Care Resource & Referral Agencies (NACCRRA) appreciates the opportunity to comment on the proposed FY2012-2013 Child Care and Development Fund Plan Preprint. We commend the commitment to collect more data on the quality of child care and CCDF quality investments, as well as revising CCDF’s national performance measures.

NACCRRA’s vision is that the United States is a nation that supports the development and learning of all children. We are pleased to see the U.S. Department of Health and Human Services, Administration for Children and Families, Office for Child Care is putting increased emphasis on health and safety and quality improvement in child care and accountability for CCDF expenditures. We are particularly glad to see attention to understanding the quality of care for children who are in situations that are exempt from child care licensing regulations. CCR&R services provide foundational supports for many aspects of CCDF services, including training, technical assistance, consumer education, referrals, market rate surveys, subsidy administration, and local leadership to support child care providers and decision makers. Our comments reflect the ongoing commitment of NACCRRA and its members to promote policies and partnerships to ensure access to quality child care and early learning services for all children.

Specific comments

Text in *italics* is text from the Draft document or text that NACCRRA suggests adding to the document. Text in **red** is proposed NACCRRA language.

1. Table 1.3.2 CCDF Program Administration and Implementation (p. 7)

Comment: Add new row to table with information about who delivers quality activities:

<i>CCDF Services/Activities</i>	<i>Agency (Check all that apply)</i>
<i>Who delivers quality activities?</i>	<input type="checkbox"/> <i>CCDF Lead Agency</i> <input type="checkbox"/> <i>TANF agency</i> <input type="checkbox"/> <i>Other State/Territory agency. Describe.</i> <input type="checkbox"/> <i>Local government agencies such as county welfare</i> <input type="checkbox"/> <i>or social services departments</i> <input type="checkbox"/> <i>For-profit private vendors/contractor</i> <input type="checkbox"/> <i>Child care resource and referral agencies</i> <input type="checkbox"/> <i>Community-based organizations</i>
<i>Other. List and describe</i>	<input type="checkbox"/>

2. 2.1.3 (p. 14-15)

Comment: Reword statement and add phrase about websites with inspection reports

Describe how the Lead Agency ensures that parents applying for CCDF assistance are informed about tools to assess the quality of care provided by various providers. For example, memorandums of understanding with resource and referral agencies to provide consumer education to families applying for CCDF assistance, providing parents with provider lists showing licensing history, **websites with inspection reports**, and ~~or~~ QRIS ratings, or informational brochures that address the importance of quality and different care options available.

3. 2.6.4 Market Rate Survey (p. 28)

Comment: Add questions about who conducts the market rate survey and how much is spent for the survey.

2.6.4. Market Rate Survey ...

a) Provide the month and year when the most recent local market rate survey(s) was completed (§98.43(b)(2)): _____.

b) Attach a copy of the **Market Rate Survey instrument** and a **summary of the results** of the survey.

c) **Who is responsible for conducting the most recent local Market Rate Survey(s)?**

d) **How much was spent conducting the most recent local Market Rate Survey(s)?**

4. 2.6.7 (p. 29)

Comment: Add meals to list

2.6.7. Will the Lead Agency allow providers to charge parents any additional fees?

- € Providers are allowed to charge the difference between the maximum reimbursement rate and their private pay rate
- € Providers are allowed to charge registration fees/transportation fees
- € **Providers are allowed to charge for meals**
- € Providers are allowed to charge additional incidental fees such as field trips or supplies
- € Policies vary across region, counties and or geographic areas. Describe
- € No, providers may not charge parents any additional fees
- € Other. Describe

5. Part 3: Health and Safety and Quality Improvement Activities (p. 30)

Comment: Add inspections to the first key component:

This section is organized based on four key components of quality which encompass most of the quality investments and initiatives undertaken by CCDF Lead Agencies:

1. Ensuring health and safety of children through licensing, *on-site inspections* and health and safety standards

6. 3.1.1 – Definition - ☐ Family Child Care Home, b-1 (p. 32)

Comment: Add hours of care are limited as an option

€ Family Child Care Homes. Family child care provider is defined as one individual who provides child care services for fewer than 24 hours per day per child, as the sole caregiver, in a private residence other than the child's residence, unless care in excess of 24 hours is due to the nature of the parent(s)'s work. (§98.2). ...

- € Based on the number of children in care
- € Care provided by a relative (in the provider's home)
- € Children in care are siblings or from one family
- € *Hours of care are limited*
- € Other. Describe

7. 3.1.2 Enforcement of Licensing Requirements (p. 33)

Comment: Add two columns to table to show types of inspection visits

a) Does your State/Territory use **announced** and **unannounced** visits to effectively enforce the licensing requirements?

Provider Categories	Frequency of Routine Announced Visits	Frequency of Routine Unannounced Visits	Types of Routine Announced Visits	Types of Routine Unannounced Visits
€ Center-Based Child Care			<ul style="list-style-type: none"> € Prelicensing € Licensing Renewal € After a Complaint 	<ul style="list-style-type: none"> € Licensing Renewal € After a Complaint
€ Group Home Child Care			<ul style="list-style-type: none"> € Prelicensing € Licensing Renewal € After a Complaint 	<ul style="list-style-type: none"> € Licensing Renewal € After a Complaint
€ Family Child Care Home			<ul style="list-style-type: none"> € Prelicensing € Licensing Renewal 	<ul style="list-style-type: none"> € Licensing Renewal € After a

			€ After a Complaint	Complaint
€ In-Home Child Care			€ Prelicensing € Licensing € Renewal € After a Complaint	€ Licensing € Renewal € After a Complaint

8. 3.1.2 Enforcement of Licensing Requirements

b) Does your State/Territory use background checks to effectively enforce the licensing requirements? (p. 34)

Comment 1: Add text about using a fingerprint for state criminal records check to each category.
 Comment 2: Add check of juvenile records as a type of background check to each category.

b) Does your State/Territory use background checks to effectively enforce the licensing requirements?

Provider Categories	Types of Background Check	Frequency
€ Center-based Child Care	€ Child Abuse Registry	€
	€ State/Territory Criminal Background € State/Territory Criminal Background Using a Fingerprint	€ Initial Entrance into the System € Checks Conducted Annually € Other. Describe
[Also add in these rows:] € Group Child Care Homes € Family Child Care Homes € In-Home Child Care Providers	€ FBI Criminal Background (e.g., fingerprint)	
	€ Sex Offender Registry	
	€ Juvenile Records Check	
	€ Self-Certification Declaration	

9. 3.1.2 Enforcement of Licensing Requirements (p. 37)

Comment: Add a new question that asks about background checks for volunteers, other residents of a family child care home, etc.

xxx) Does your State/Territory require background checks for any person other than the provider (e.g., volunteers, other residents of a group child care home or family child care homes, etc?)

*c) If not performing visits (announced or unannounced) or background checks, how does the State/Territory ensure that its licensing requirements are effectively enforced per the CCDF regulations? (658E(c)(2)(E), §98.40(a)(2))
 Describe*

10. 3.1.3 Compliance with ... Regulatory Requirements on Health and Safety (p. 39)

Comment: Add question about training related to shaken baby syndrome.

- c) **Describe** the health and safety requirements for health and safety training in effect for child care providers of services for which assistance is provided under CCDF. (658E(c)(2)(F)(iii), §98.41(a)(3))

	Health and Safety Training Requirements	Pre-Service	On-Going
Child Care Centers	SIDS Prevention (i.e., Safe Sleep)		
	Medication Administration		
[Also add in these rows:]	Mandatory Reporting of Suspected Abuse or Neglect		
	<i>Shaken Baby Syndrome</i>		
	Child Development		
€ Group Child Care Homes	Supervision of Children		
€ Family Child Care Homes	Behavior Management		
€ In-Home Child Care Providers			

11. 3.1.3 Compliance with ... Regulatory Requirements on Health and Safety (p. 41)

Comment: Add question about requirements for exempt care providers that parallels the question about relative providers

d) What are the Lead Agency's requirements for relative providers (grandparents, great-grandparents, siblings if living in a separate residence, aunts, and uncles)?

- € All relative providers are subject to the same health and safety requirements as described in 3.1.3a-c, as appropriate; there are no exceptions for relatives.
- € No relative providers are required to meet all health and safety requirements as described in 3.1.3a-c, as appropriate.
- € Relative providers are subject to certain requirements (e.g., different training content or hours). Describe the different requirements below.
 - € Relative providers are subject to background checks. Describe
 - € Relative providers are subject to monitoring visits. Describe
 - € Other. Describe

xxx) What are the Lead Agency's requirements for other child care providers who are exempt from child care licensing who provide services for which assistance is provided under CCDF?

- € All exempt providers are subject to the same health and safety requirements as described in 3.1.3a-c, as appropriate; there are no exceptions for exempt providers.
- € No exempt providers are required to meet all health and safety requirements as described in 3.1.3a-c, as appropriate.
- € Exempt providers are subject to certain requirements (e.g., different training content or hours). Describe the different requirements below.
 - € Exempt providers are subject to background checks. Describe
 - € Exempt providers are subject to monitoring visits. Describe
 - € Other. Describe

12. 3.1.4 Data & Performance Measures on Licensing and Health and Safety Compliance (p. 41)

Comment: Add total capacity of licensed programs to list.

a) Data collected on licensing and health and safety. At a minimum, indicate if the Lead Agency or another agency collects:

- € Number of licensed programs
- € **Total capacity of licensed programs**
- € Numbers of programs operating that are legally exempt from licensing

13. 3.3.2 Element 2 – Non-Monetary Supports ... (p. 45)

Comment 1: Add additional types and methods of nonmonetary supports used to support child care programs.

Comment 2: Add column on Provider of Support.

a) Identify which types and methods you use to support to child care programs in the following chart. Check all that apply.

Areas of Support	Information or Written Materials	Training	On-Site Consultation	Provider of Support
€ Attaining and maintaining licensing compliance	€	€	€	
€ Attaining and maintaining quality improvement standards	€	€	€	
€ Attaining and maintaining accreditation	€	€	€	
€ Health and Safety	€	€	€	
€ Social-emotional development	€	€	€	
€ School readiness	€	€	€	
€ Family engagement	€	€	€	
€ Education curriculum and assessment/ classroom practice	€	€	€	
€ Integrating children with special needs	€	€	€	
€ Infant and toddler development	€	€	€	
€ Programming for school-age children	€	€	€	
€ Other. Describe	€	€	€	

14. 3.3.3 Element 3 – Financial Incentives (p. 46)

Comment: Add scholarship as at type of Financial Incentive

Types of Financial Incentives	Child Care Centers	Child Care Homes	License-Exempt Providers
€ On-going, periodic grants or stipends tied to maintaining quality			
€ Scholarships			
€ Tax Credits			

15. 3.3.4 Element 4 – Quality Assurance and Monitoring a) (p. 47)

Comment 1: In the Environment Rating Scales row, separate ERS into infant/toddler, preschool, and school age.

Comment 2: CLASS does not apply to Child Care Homes.

Comment 3: Add The Business Administration Scale for Family Child Care (BAS) – PAS is for center-based programs.

Types of Program Quality Assessment	Child Care Centers	Child Care Homes	License-Exempt Providers
€ Environment Rating Scales Describe, including frequency of assessments	€ Infant/ Toddler € Preschool € School-age	€	€
€ Classroom Assessment Scoring System (CLASS)	€		
€ Program Administration Scale	€		
€ Business Administration Scale for Family Child Care (BAS)		€	€

16. 3.3.4 Element 4 – Quality Assurance and Monitoring b) (p. 47)

Comment: Include accreditation, but delete “private”

- b) Has the State/Territory taken steps to establish reciprocity with or alignment with ...
€ Accreditation

17. 3.3.5 Element 5 – Outreach and Consumer Education (p. 48)

Comment: Add clarifying text

- b) Does the State/Territory use multiple forms of media to reach parents and the public to communicate about levels of quality for child care programs? Check all that apply.

18. 3.3.6 Quality Rating and Improvement System (p. 49)

Comment 1: For states with statewide QRIS, ask if it is voluntary or mandatory.

Comment 2: Add clarifying language to the option about not having a QRIS that includes linked activities.

a) Based on the five key elements ...

€ Yes, the State/Territory has a QRIS or similar quality improvement system that includes linked activities in all five areas operating State/Territory-wide.

€ Participation is voluntary.

€ Participation is mandatory.

€ No, the State/Territory does not have a QRIS or similar quality improvement system that includes linked activities in all five elements.

€ State/Territory is in the development phase.

€ State/Territory has no plans for development.

€ Other. Describe

Comment 3: Add school age as a category to types of providers eligible to participate in QRIS.

b) If yes to 3.3.1a ...

€ School-age providers

€ Other

19. 3.4.1 Workforce Element 1 – Competencies b) (p. 51)

Comment: Include “trainers” with Education and Training Staff

b) For which roles has the State/Territory developed CKC’s? Check all that apply.

€ ...

€ Education and Training Staff (such as *trainers*, TA providers, CCR&R staff, instructors, faculty). Describe

20. 3.4.2 Workforce Element 2 – Career Ladder a) (p. 52)

Comment: Add the word “describe” to the career ladder options

€ Early childhood career ladder. Describe _____

€ School-age career ladder. Describe _____

21. 3.4.2 Workforce Element 2 – Career Ladder b) (p. 52)

Comment: Include “trainers” with Education and Training Staff

b) Which roles are included in the career ladder? Check all that apply.

€ Practitioners (working directly with children, including center-based aides, assistant teachers, teachers, master teachers, educational coordinators, directors, and family child care home providers and assistants)

€ Administrators

€ Support staff (such as mentors, coaches, home visitors, mental health consultants, etc)

€ Education and Training Staff (such as *trainers*, TA providers, CCR&R staff, instructors, faculty)

€ Other. Describe

22. 3.4.2 Workforce Element 2 – Career Ladder d) (p. 53)

Comment: Add Other. Describe as an option to d)

d) *Does the career ladder apply to:*

€ *Other. Describe _____*

23. 3.4.2 Workforce Element 2 – Career Ladder e) (p. 53)

Comment 1: Add state licensing as a possible alignment.

Comment 2: Add question about CDA credential and career ladder

d) *Does the career ladder align with the:*

...

€ *State licensing*

€ *Is the CDA credential built into the career ladder?*

24. 3.4.3 Workforce Element 3 – Higher Education Capacity b) and c) (p. 53-54)

Comment 1: Add State Licensing Standards and National Council for Accreditation of Teacher Education (NCATE) as possible alignment.

Comment 2: Delete “are” from c)

Comment 2: Add question about online learning

b) *Are higher education programs in the State/Territory aligned with:*

€ *Core knowledge and competencies?*

€ *Career ladder?*

€ *Quality Rating and Improvement System?*

€ *State Teacher Licensing Standards*

€ *National Council for Accreditation of Teacher Education (NCATE)*

c) *Does the State/Territory have articulation agreements ~~are~~ in place across and within institutions of higher education and between the training and technical assistance system and higher education?*

d) *Is online learning an accepted format for training and education?*

€ *Yes, Describe _____*

€ *No*

3.4.4 Workforce Element 4 -Training & Technical Assistance Capacity c) (p. 54)

Comment: Add state licensing as an option for alignment

c) *Are publicly-funded, non-credit training opportunities in the State/Territory aligned with:*

€ *Core knowledge and competencies?*

€ *Career ladder?*

€ *Quality Rating and Improvement System?*

€ *State Teacher Licensing Standards*

25. 3.4.4 Workforce Element 4 -Training & Technical Assistance Capacity d) (p. 54)

Comment: add trainer to people working with the workforce

d) Does the State/Territory have *trainers*, mentors and coaches available to work with the early childhood and school-age workforce?

26. 3.4.7 Data & Performance Measures on the Child Care Workforce – ... (p. 56)

Comment: Replace “teachers” with “Practitioners (working directly with children, including center-based aides, assistant teachers, teachers, master teachers, educational coordinators, directors and family child care home providers and assistants).”

a) *Data collected on the child care workforce. At a minimum, indicate if the Lead Agency or a partner agency collects:*

€ *Data on the size of the child care workforce*

€ *Data on the characteristics of ~~teachers~~ practitioners (working directly with children, including center-based aides, assistant teachers, teachers, master teachers, educational coordinators, directors and family child care home providers and assistants)”*

€ *Records of individual ~~teachers~~ practitioners and their qualifications*

27. Appendix 1: 1.2.1 Number of licensed programs (p. 61-620)

Comment: Add questions about capacity.

1.2.1 Number of licensed programs

a) How many licensed center-based programs operated in the State/Territory as of September 30, 2012? _____ or Data not available

1) What is the capacity of center-based programs operated in the State/Territory as of September 30, 2012? _____ or Data not available

b) How many licensed home-based programs operated in the State/Territory as of September 30, 2012? _____ or Data not available

1) What is the capacity of home-based programs operated in the State/Territory as of September 30, 2012? _____ or Data not available

28. Appendix 1: 1.2.6 How many injuries or fatalities occurred in child care as of the end of the last fiscal year? (p. 63)

Comment: Split the question into two questions. Clarify wording about injuries. Ask about setting where injuries or fatalities occurred.

1.2.6 How many reportable injuries occurred in child care as of the end of the last fiscal year?

In a child care center? _____

In a family child care home? _____

In license-exempt care? _____

1.2.7 How many fatalities occurred in child care as of the end of the last fiscal year?

In a child care center? _____

In a family child care home? _____

In license-exempt care? _____

29. Appendix 1: 3.2 Key Data (pp. 65-68)

Comment: Add "School-Age Programs" to the following sections:

3.2.2 a) and b), 3.2.3, 3.2.4, 3.2.5, 4.2.2, 4.2.3, 4.2.4, 4.2.5

30. 4.2.2 How many teachers/caregivers have the following qualifications ... (p. 67)

Comment: Include degrees above the BA

	Child Care Center Teachers	Family Child Care Providers
Bachelor's degree		
More than a bachelor's degree		

31. 4.2.5 How many teachers or other professionals receive coaching or TA as of the end of the last fiscal year?... (p. 68)

Comment: Add the word, "training"

4.2.5 How many teachers or other professionals received *training* coaching or TA as of the end of the last fiscal year?

32. 3.2 Key Data 3.2.1 through 3.2.6 – (p. 65-66)

Comment: Add "☐ Data not available" for every option, not just at the end of each category.

3.2.1 How many programs ...
Health and safety

☐ Data not available

Social and emotional development

☐ Data not available

...

3.2.2, 3.2.3, 3.2.4, 3.2.5, 3.2.6

33. 3.2.2 through 3.2.5 – (p. 65-66)

Comment: Add other types of programs to make reporting consistent with required quarterly and annual reporting requirements

3.2.3 Participation rate ... :

3.2.4 Progression in QRIS ... :

3.2.5 Programs at each level of quality ... :
Child Care Centers

☐ Data not available

Family Child Care Home

☐ Data not available

Group Home

☐ Data not available

In-Home Care

☐ Data not available

School-Age Programs

☐ Data not available

License-Exempt Programs

☐ Data not available

34. 4.2.6 Financial supports (p. 68) [minor editing point]

Comment: Make include caregivers when choices include teachers to make selection consistent.

€ Scholarships. How many teachers *and caregivers* received?

€ *Data not available*

€ Reimbursement ... How many teachers *and caregivers* received?

□ *Data not available*

€ Loans. How many teachers *and caregivers* received?

€ *Data not available*

€ Wage supplements. How many teachers *and caregivers* received?

□ *Data not available*

€ Other

35. Appendix 1: How Were CCDF Quality Funds Spent? Table 5.1 (p. 69)

Comment: Because CCR&Rs provide services that cover multiple functions, it is important to identify the percentage of CCDF quality funds that go to CCR&Rs. CCR&Rs should be a separate category under table 5.1.

ACF-696 ... Categories	Licensing ...	Technical Assistance	Financial Supports	Workforce and Professional Development	Data Systems	Consumer Education
<i>School-Age Targeted Funds</i>	_____ %	_____ %	_____ %	_____ %	_____ %	_____ %
<i>Resource and Referral Targeted Funds</i>	_____ %	_____ %	_____ %	_____ %	_____ %	_____ %

Please refer questions about specific recommendation to

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