



**Comments on Child Care and Development Fund Plan Preprint
For States and Territories FFY 2012-2013
California Child Care Resource and Referral Network Comments**

Submitted by Patty Siegel, Executive Director
November 23, 2010

We greatly appreciate this opportunity to provide comments on the Child Care and Development Fund Plan Preprint for States and Territories for FFY 2012-2013. The draft preprint reflects the increased significance and advancement of Quality Rating Systems nationally while addressing the role of the Child Care and Development Fund and individual state systems in the overall advancement of quality improvement supports. We would like to take this opportunity to provide our comments and input on the pre-print document.

Section Comments

Part 1: Administration:

1.3.2 CCDF Program Administration and Implementation Table

We suggest adding a new row to the table with information about who delivers quality activities. The same agencies listed under “Who Administers quality activities?” should be listed for this suggested category.

1.6.1 Lead Agency coordination in delivery of child care and early education

This table should also include a box to indicate consultation with the agency responsible for child care licensing. In California, the lead agency responsible for administering the CCDF funds (California Department of Education) is not the same agency responsible for child care licensing (California Department of Social Services). The foundation for quality child care begins with a properly funded licensing system and assurance that licensing is interwoven into any quality improvement and rating system is essential.

1.7 Child Care Preparedness and Emergency Response Plan

This section could include the requirement to work collaboratively with funded programs and State and national organizations dedicated to emergency response work and for the plan to include identification of those partners.

Part 2: CCDF Subsidy Program Administration:

2.1.5. How does the Lead Agency reduce barriers to initial eligibility?

A category for providing information in multiple languages should be added, and states should be asked to indicate which languages are used, describe which strategies are used for communicating in multiple languages (written materials, making translators available, etc.), and which materials are made available in multiple languages. This is particularly important in states like California where there are a very large number of low-income families and child care providers for whom English is a second language.

2.1.6 Describe the Lead Agencies policies that promote continuity of care for children and stability for families.

Include a question that relates to measures taken to accommodate family's ability to access preschool- specific services for their children to build on their participation and use of family child care and/or in-home exempt child care arrangements that promote the continuity of care and stability for families.

2.1.7. How does the Lead Agency address language barriers with families and providers?

It would be helpful to ask separate questions about addressing language barriers for families and addressing language barriers for providers. The process for addressing the issue will likely differ. Frequently at the local level there is greater access to resources to address language barriers. Child care resource & referral programs in California have made great strides to address this issue. Including a check-off box for child care resource & referral programs in this section would broaden the options for addressing language and cultural barriers with families and providers.

2.5.3. (a) Child Care Services Available through Grants or Contracts

While this section addresses how States will increase various types of capacity building through grants and contracts in different child care arrangements, it fails to address the option of specifically promoting the use of capacity building through child care resource & referral programs which serve to provide technical assistance, support and training to not only increase the availability and capacity of programs but also to improve the quality. A question should be added asking: Who will deliver supply building and quality improvement services? Child care resource and referral programs should be included as one of the box choices in this added section.

2.5.4. How will the Lead Agency inform parents and providers of policies? and procedures for affording parents unlimited access to their children whenever their children are in the care of a provider who receives CCDF funds?

This section should also include a check-off box that indicates this information will be provided through the contact with the child care resource & referral program.

Part 3: Health and safety and quality improvement activities:

In general, this section should clarify when questions are referring to policies and requirements specific to the child care subsidy system, and when the questions are

referring to policies and requirements for the broader child care delivery system which includes, but is not limited to, the subsidy system.

As initially conceived by Congress, the Quality-set aside in the CCDF plan was designed to support both the subsidized child care system as well as the general non-subsidized child care system. The quality set aside was the one piece in the CCDBG legislation enacted in 1990 that addressed the urgent need to lift up and improve quality for the whole child care system. The issue of how non-subsidized families will be informed of child care services available to them and the role of quality improvements including any developed and implemented Quality Rating System is not addressed in the current version of the pre-print document. The consumer education and outreach piece reflected in section 2.5 *Parental Choice in Relation to Certificates Grants or Contracts* needs to be addressed somewhere in the document for non-subsidized families which includes families that are eligible for subsidized child care but not yet able to access it due to limited resources and, in some states like California, long waiting lists.

Introduction section of Part 3, page 30

In the paragraph related to Lead Agency expectations in making investments toward increased quality improvement a notation related to “subsidized and non-subsidized” should be included as follows:

It is expected that the Lead Agency is making systematic investments towards child care quality improvement across its early childhood and school-age spectrum – including all settings(subsidized and non-subsidized), geographic coverage and age range – that will help show progress toward these outcomes and goals.

Add Consumer Education as a component to quality, page 30

Consumer Education and parent outreach are noticeably missing from the four key components of quality child care and should be included as the first component, making a total of five components. We appreciate that Element 5 (page 48) addresses outreach and consumer education but with a singular focus on quality rating systems (see comments below). Here, in the introduction to Part 3, the inclusion should be broader to reflect the broadest consumer education activities including help in identifying child care resources that best meet individual families’ need for accessible, affordable, quality care.

Additionally, the document does not include options for identifying States’ use of targeted Quality set-asides. Since these figure prominently in states’ use of the funds a question should be added which asks states to identify how they use the set aside funds.

3.3.5, Element 5- Outreach and Consumer Education

This section only references the purpose of outreach and consumer education to promote quality improvement standards. Child care resource & referral programs provide outreach and consumer education on selecting child care which includes help in identifying the components of quality child care programs, but their assistance to parents is not limited to promoting use of quality improvement standards and rating scale assessments. They help parents identify available care and work with them on

identifying and understanding the most appropriate care to meet their needs. Reference to these other outreach and consumer education services is important in this document to ensure continued support for these critically important services.

3.3.6. a) Quality Rating and Improvement System

An option should be added to this question for states to indicate if they have some, but not all, of the five elements of a QRIS. States that select this option should be asked to describe which of the five elements they address and if there are concrete plans to incorporate the remaining elements.

3.3.7. a) Data and performance measures on program quality

The option, “Number/percentage of children in low-income families receiving CCDF assistance in licensed/quality care” should be replaced with the following: “Number/percentage of children in low-income families receiving CCDF assistance programs at each tier of the quality rating system.”

3.4. Pathways to excellence for the workforce

For this section, we endorse the recommendations provided separately by the National Association for the Education of Young Children (NAEYC), including recommendations on wording changes, adding questions, and combining the separate sections on higher education capacity and training and technical assistance capacity into one section on professional development capacity. NAEYC’s recommendations will help strengthen this section in order to emphasize the importance of a strong early childhood workforce and of a professional development system that helps strengthen that workforce; to ensure that the most current language and terms are used; to gather more information about the extent to which and how different components within the state’s workforce system are aligned and how the workforce system is aligned with other components of the state’s overall early care and education system; and to focus on those aspects of the system that the state agency can influence, as opposed to those controlled by institutions of higher education.

Appendix 1: How Were CCDF Quality Funds Spent?

We concur strongly with NACCRRRA’s recommendation that because Child Care Resource and Referral programs provide services that cover multiple functions, it is important to identify the percentage of CCDF quality funds that go the CCR&Rs. CCR&Rs should be a separate category under table 5.1. We appreciate that School Age funds and Resource and Referral funds are combined in the targeted set aside, but for accurate portrayal of quality expenditures they should be separated.

Please refer questions about our specific recommendations to:

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