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#### National Association for the Education of Young Children

1313 L Street NW, Suite 500, Washington, DC 20005-4101 202-232-8777 800-424-2460 Fax 202-328-1846 www.naeyc.org

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Administration for Children and Families Office of Administration
Office of Information Services
370 L'Enfant Promenade, SW
Washington, DC 20447
Attn: ACF Reports Clearance Officer.

E-mail address: <u>infocollection@acf.hhs.gov</u>

Proposed Information Collection Activity; Comment Request Proposed Projects

*Title:* Child Care and Development Fund Plan for States/Territories for FFY 2012–2013 (ACF–118).

OMB No.: 0970-0114.

NAEYC appreciates the opportunity to provide comments on the proposed FY 2012 – 2013 CCDF Plan Preprint.

We are pleased that the Office of Child Care draft preprint

- recognizes and supports the ways in which CCDF advances state early care and education systems work;
- focuses on aligning state quality improvement activities with the overall administration of CCDF in the states;
- is condensed into what seems like a more user-friendly length; and
- is formatted and organized in such a way as to reduce duplication of information collected.

We do offer, however, our cautions about the collection and use of child outcomes data as proposed in the draft. We do encourage states to collect information on whether providers are using published or staff-developed curricula and instructional assessments and whether providers are receiving training on the state early learning guidelines, even if they are not required to use them. However, our comments reflect our understanding of the cautions offered by the National Academies of Science 2008 report *Early Childhood Assessment: Why, What, and How* on the potential for inappropriate use in accountability systems<sup>1</sup>. You will see that we have added a new section of questions focusing on curriculum, screening, and instructional assessment.

<sup>&</sup>lt;sup>1</sup> National Academies of Science, Early Childhood Assessment: Why, What, and How. Washington, DC (2008) at pages 19-20; see also National Academies of Science, Eager to Learn: Educating Our Preschoolers, Washington, DC (2000) at pages 11-12.

The Federal Register notice for the FY 2012 – 2013 CCDF Plan Preprint specifically asks for comments on the following:

- a) Whether the proposed collection of information is necessary for the proper performance of the functions of the agency, including whether the information shall have practical utility we believe that it is necessary.
- b) *The accuracy of the agency's estimate of the burden of the proposed collection of information* we do not have the technical expertise to answer this question.
- c) The quality, utility, and clarity of the information to be collected there is great potential for the use of the information to be collected to improve access to and the quality of child care and early childhood education systems work.
- d) Ways to minimize the burden of the collection of information on respondents, including through the use of automated collection techniques or other forms of information technology we do not have the expertise to answer this question.

NAEYC's comments are arranged to follow the three sections of the Preprint in narrative and with suggested language changes. We welcome an opportunity to further discuss these comments in-depth.

#### **Part 1: Administration**

# 1.5 Consultation in the Development of the CCDF Plan

# Table 1.5.1. Lead Agency Consultation Efforts

Please add the state child care resource and referral agency as an agency/entity.

### Part 2: CCDF Subsidy Program Administration

While we understand and appreciate the Office of Child Care's focus on ensuring continuity of care and parental choice of high-quality settings for families, we recommend defining high-quality at the top of this section, as well as fleshing out the questions that focus on outreach to culturally and linguistically diverse families. We also have recommendations concerning the collection of data on the waiting lists and market rate studies.

# 2.1 Family Outreach and Application Process 2.1.4.

The question mentions "high quality programs" twice but this term has not been defined for states in the preprint. It would seem that a definition to frame this question by giving some examples of higher program standards, or even examples of the standards contained in higher levels on a QRIS, would be useful to states.

# 2.1.7.

It seems as though this section can dig deeper in terms of outreach to culturally diverse families. For example, it would be interesting to know from a national standpoint in which languages consumer outreach materials are being produced. Also, it is not clear

whether the options listed in this question help to overcome language barriers with families and providers and it is not clear which of the options listed currently address the needs of families, providers, or both. It may be necessary to split this into two questions (one that focuses on families and one that focuses on providers). In addition, it seems as though this question should be moved to follow question 2.1.2.

# 2.4. Prioritizing Services for Eligible Children and Families 2.4.3. Waiting Lists

Please add an additional question: "What is the number of children on the wait list as of \_\_\_\_\_ [a certain date (i.e., the date of submission of the plan)]?"

# 2.5 Parental Choice in Relation to Certificates, Grants or Contracts 2.5.2. Child Care Certificates

It would be useful to collect the languages of these sources of information for comparison to the languages that would be indicated in question 2.1.7. For example, it would be interesting to note any discrepancy between the languages of general consumer outreach materials and the languages of communication about child care choices.

# 2.6. Payment Rates for Child Care Services 2.6.5

The year that the current market rate is set would be useful since the current market rate may not reflect the year in which the plan is submitted.

# Part 3: Health and Safety and Quality Improvement Activities 3.2 Establishing Early Learning Guidelines (Component #2) 3.2.1

Please add a follow up question about whether the state is currently revising or planning to revise their early learning guidelines (and specify which ones will be revised).

### 3.2.3

NAEYC suggests the following language change to this question (addition is underlined):
3.2.3 To whom are the early learning guidelines disseminated and in what
manner? (e.g., on web, multiple languages, distribution to provider
organizations)

# **Insert new question following 3.2.3:**

Which types of providers of early childhood learning are required to implement the state's early learning guidelines? (e.g., licensed child care, state-funded prekindergarten programs)

### 3.2.4

Rephrase the question to: "Is training on the guidelines available to child care practitioners <u>and others</u> in different settings?" and add Head Start/Early Head Start programs and Elementary Schools to the list of settings.

## 3.2.5.

The options for answering this question include "Quality rating and improvement standards (or similar standards)" – it is unclear what "similar" standards are and clarification on this point would be useful. This is a place where examples of either standard areas (curriculum, learning environment, etc.) or specific standards would be helpful. This could also be a place where states are asked to give examples of such standards, without defining these standards for them.

# 3.2.7 Data & Performance Measures on Early Learning Guidelines

We recommend certain deletions shown in brackets and additional language shown in underline; please also refer to our recommendation for a new question on which types of providers the State/Territory requires to implement the state early learning guidelines.

**3.2.7 Data & Performance Measures on Early Learning Guidelines**—What data elements are the Lead Agency currently collecting on the dissemination of, implementation of[, or children's attainment] of the Lead Agency's early learning guidelines? What, if anything, does the Lead Agency use for performance measures on <u>dissemination and implementation of the early learning guidelines?</u>

a) **Data collected on early learning guidelines**. At a minimum, indicate if

ie L	e Lead Agency or a partner agency collects:	
	Number/percentage of child care providers trained on ELG's <u>for</u>	
	<u>preschool age</u>	
	Number/percentage of child care providers trained on ELG's for	
	<u>infants and toddlers</u>	
	Number of programs implementing ELG's	
	Number of parents trained on or served in family support programs	
	that use ELG's	
	[Child assessment data linked to ELGs]	
	Other. Describe	

- b) **Performance measurement**. Does the lead agency track any performance measures related to <u>dissemination and implementation of the</u> early learning guidelines? If so, please describe.
- c) **Evaluation**. What are the Lead Agency's plans for evaluation related to early learning guidelines? Evaluation can include efforts related to monitoring implementation of an initiative, validation of standards or <u>program</u> assessment tools, [or looking at outcomes in programs or the system] and may be ongoing or conducted periodically.

### **Insert two questions following 3.2.7:**

What number/percentage of child care providers use published curricula and instructional assessments (list all domains)?

What number/percentage of child care providers use staff-developed curricula and instructional assessments (list all domains)?

# 3.3 Creating Pathways to Excellence for Child Care Programs through Program Quality Improvement Activities including Quality Rating and Improvement Systems (Component #3)

This section provides a unique opportunity to capture the program quality improvement work that states are doing with a systemic approach. In general, the use of various terms such as "quality improvement standards," "similar quality improvement system," and "other program quality improvement activities" throughout this section is confusing. We would suggest using the term "other program quality improvement initiatives" consistently throughout as an all encompassing term since calling something that does not link to the broader early childhood system a "quality improvement system" can be misleading. Also, the definition that leads this section should be expanded to specify that a QRIS is also a coordinated and comprehensive system (with more than 2 levels) with linkages to other parts of the early childhood system, such as a professional development system and early learning guidelines.

# 3.3.1 Element 1 – Program Standards

a)

NAEYC recommends the following edits and additions to the standard areas; suggested edits to existing text are underlined in the following, which also includes suggestions for re-ordering and/or eliminating some questions.

Ratios and group sizes
Health, <u>nutrition</u> , and safety
Learning environment and curriculum
<u>Teacher-child relationships</u>
<u>Teaching (instructional) practice</u>
Staff qualifications and professional development
Family partnerships and family strengthening
<u>Community relationships</u>
<u>Program</u> administration and management
<u>Cultural competence</u>
Child assessment for the purposes of individualizing instruction and/or targeting
program improvement
Developmental screenings

b)

This question presents an opportunity to collect rich qualitative data on exactly what these considerations entail (i.e., extra points on a rating scale; additional tools, training or technical assistance for working with special populations). This more detailed information would be incredibly useful to know across states.

c)

It is not clear whether the option "Not linked" indicates that those quality standards apply to license-exempt providers. It may be necessary to add another question which asks whether such quality standards apply to license-exempt providers.
<b>d)</b> NAEYC recommends adding a specific indicator for National Accreditation (and a prompt to specify which accrediting bodies).
3.3.2 Element 2 – Non-Monetary Supports
<ul> <li>a)</li> <li>NAEYC recommends adding the following areas of support:         <ul> <li>□ Teaching dual language learners</li> <li>□ Understanding observational assessments</li> <li>□ Understanding appropriate child assessment methods</li> </ul> </li> </ul>
3.3.3 Element 3 – Financial Incentives
a)  NAEYC recommends adding the following types of financial incentives:  ☐ One-time awards or bonuses for attaining specific staff qualifications ☐ Scholarships ☐ Reimbursement for books and fees ☐ Reimbursement for accreditation fees
3.3.4 Element 4 – Quality Assurance and Monitoring
c) NAEYC advises removing this question as it does not relate to the definition provided of quality assurance and monitoring.
3.3.6 Quality Rating and Improvement System
<b>a)</b> Please add an additional option (and follow up question) for this question that reads:
<ul> <li>Yes, the State/Territory has a program quality improvement initiative that includes the following linked elements (please choose all that apply):</li> <li>□ Program standards</li> <li>□ Non-monetary standards</li> <li>□ Financial incentives</li> <li>□ Quality assurance and monitoring</li> <li>□ Outreach and consumer education</li> </ul>
Does the State/Territory currently have plans to link this program quality improvement initiative with all of the preceding five key elements of a QRIS in the future?    Yes.

□ No.

# 3.3.7 Data & Performance Measures on Program Quality

a)

NAEYC recommends removing child assessment data based on the National Academies of Sciences 2008 report's cautions on the inappropriate uses of assessment.

NAEYC recommends removing language marked in brackets and adding the language that is underlined:

a) Data collected on program quality. At a minimum, indicate if you collect:
☐ Data on the current quality assessment for individual programs (e.g. QRIS
level, assessment instrument score, etc.)
☐ Number of programs that move levels annually
☐ Program scores on assessment instruments. List instruments:
☐ Classroom scores on assessment instruments. List instruments:
☐ Qualifications, compensation, and retention of staff in each program
☐ Number/Percentage of children in low-income families receiving
☐ CCDF assistance in licensed/quality care
☐ Number/Percentage of programs receiving financial assistance to meet
higher program standards
☐ [Child assessment data]
☐ Other. Describe

c) NAEYC recommends removing language marked in brackets and adding the language that is underlined:

**c) Evaluation.** What are the Lead Agency's plans for evaluation related to program quality? Evaluation can include efforts related to monitoring implementation of an initiative, validation of standards or <u>program</u> assessment tools, or looking at <u>changes in staff qualifications</u> [outcomes in programs or the system] and may be ongoing or conducted periodically.

# 3.4 Pathways to Excellence for the Workforce – Professional Development Systems and Workforce Initiatives (Component #4)

This section represents a significant opportunity to encourage the essential policy elements in workforce systems as well as the overall connections and functioning of the system itself. In order to accomplish this, questions must be asked both at the right level and must also reflect contemporary best practices that are occurring or being planned in the states. NAEYC suggests specific language changes, edits, and order adjustments to gather accurate information including additional requests for state efforts regarding quality assurances and currently absent requests about system governance. State system work has shown the importance of both of these areas in helping to link pieces of professional development into an intentionally connected and comprehensive professional development system.

Additionally, to avoid confusion and overlap, NAEYC recommends asking the desired specific alignment questions regarding professional development systems and pieces only in the first and final sub-sections of 3.4 (content alignment in Element 1 – Core

Knowledge and Competencies and system pieces alignment in the suggested new Element 6 – Governance).

Suggested edits to existing text are underlined in the following introductory paragraphs.

Pathways to excellence for the workforce builds on the significant investments States and Territories have made in the area of professional development systems to ensure a well-qualified workforce with opportunities for growth from entry level through master teacher, with an increasing emphasis on the many additional roles in the child care system (e.g. <u>adult educators such as consultants, technical assistance providers, trainers, and higher education faculty).</u> In this section, States and Territories describe their progress and goals for the upcoming Biennium.

For purposes of this section, States and Territories will respond according to six key elements for workforce systems:

- 1) Core Knowledge and Competencies
- 2) Career Pathways
- 3) <u>Professional Development Capacity (including Higher Education and Training and Technical Assistance Capacity)</u>
- 4) Access to Professional Development (Training, Education and Technical Assistance)
- 5) Compensation, benefits, and workforce conditions
- 6) Governance

## 3.4.1 Workforce Element 1 – Competencies: Core Body of Skills and Knowledge

Core knowledge and competencies articulate the central and overall content of what adults need to know, understand and be able to do in work with and on behalf of young children regardless of setting, age group, etc.; they are the foundational "what" of professional standards and extend beyond the understanding of child development to include all of the professional knowledge and skill areas required. Without a common core of content, parallel systems and efforts have and can occur; questions about additional content for specific roles should be framed as supplemental or specializations reflecting both current and best practices in system building and professional development design.

NAEYC suggests multiple revisions to this important section which serves as a cornerstone for professional development systems; the following text contains the edits and suggestions from NAEYC for 3.4.1, including a change in title for consistency. Suggested edits to existing text are underlined in the following, which also includes suggestions for re-ordering and eliminating some questions.

## 3.4.1 Workforce Element 1 – Core Knowledge and Competencies

**Definition** – For purposes of this section, core knowledge and competencies (CKCs) refers to the expectations for <u>what</u> the workforce should know (content)

and be able to do (skills) <u>in their role working with and/or on behalf of young children and their families.</u> These CKCs provide a foundation for professional development <u>design</u> (<u>including</u> instructional practices) and other quality improvement efforts.

a) H	las the State/Territory developed core knowledge and competencies (CKCs)
for p	professionals working with and/or on behalf of young children?
	Yes
	No, the State/Territory has not developed core knowledge and competencies
	Skip to question 3.4.2.
	Other:
Inse	rt web addresses, where possible:
b) E	o the CKCs cover <u>a range of teaching and learning topics</u> ? Check all that
appl	
	Child growth, development, and learning
	Family and community relationships
	Observation, documentation, and assessment
	Learning environment and curriculum
	Professionalism <u>and leadership</u>
	Health, nutrition, and safety
	<u>Program administration and management</u>
	Other. Describe
	the CKCs align with other State/Territory <u>and/or national standards?</u>
	Birth-to-three early learning guidelines or standards
	Preschool early learning guidelines or standards
	School-age developmental learning standards
	K-12 academic standards
	Degree programs at state institutions of higher education
	Child care licensing standards (for example, defining the content to meet
_	preservice or ongoing requirements)
	Quality rating and improvement system standards
	National standards (for example, CDA competencies, NAEYC standards for
	early childhood professional preparation, National Board of Professional
	<u>Teaching Standards, Head Start SOLAR staff skills indicators). Please</u>
_	specify:
Ш	Other. Describe
47 I.	Ice the State/Towitowy developed supplemental or specialized competencies
_	las the State/Territory developed supplemental or specialized competencies
	ding off of the CKCs for any of the following roles? Check all that apply.
	Practitioners working directly with children in centers or schools (including
	aides, assistant teachers, teachers, and master teachers). Describe
Ш	Practitioners working directly with children in family child care homes
	(including aides, assistants, and providers). Describe

☐ Administrators in <u>centers or schools (including educational coordinators,</u>
directors, principals, etc.). Describe
☐ <u>Technical assistance providers (including mentors, coaches, consultants, </u>
home visitors, etc.) Describe
☐ Education and training staff (such as CCR&R staff, trainers, faculty, etc.).
Describe
☐ Other. Describe
Insert web addresses, where possible:
e) Has the State/Territory developed supplemental or specialized competencies
building off of the CKCs for practitioners working with the following ages?
☐ Birth-to-three
☐ Three-to-five
Five years and older
Other. Describe
□ No.
Insert web addresses, where possible:
f) Are the CKCs incorporated into other parts of the professional development
system?
☐ Career lattice (for example, defines content or distribution of training for
placement on a level)
☐ <u>Credentials (for example, defines content areas and coverage of content for</u>
<u>credential)</u>
☐ Training and/or trainer approval processes (for example, defines training
categories and approval areas)
Registry (for example, categorizes training for tracking)
Articulation agreements (for example, defines common areas for transfer)
Scholarships (for example, defines courses and workshop categories that may
be taken with scholarship awards)
☐ <u>Other: Describe</u> ☐ No.
□ <u>No.</u>
g) Are there mechanisms and processes to ensure that the CKCs remain
appropriate and current (for example, incorporate new research-based criteria; are
required to be reviewed and updated on a regular basis; etc.)?
☐ <u>Yes. Describe</u>
□ <u>No.</u>

# 3.4.2 Workforce Element 2 – Career Ladder

NAEYC recommends that the contemporary term "career pathways" with reference to the current term "career lattice" be used in this section; career ladder is a dated term, infrequently used now by states and may imply a limited reach across roles and sectors.

As suggested in Element 1 edits, NAEYC recommends asking about overall pathways as a single entity rather than suggesting multiple documents and definitions within a system;

states are moving towards the best practices for integrated systems which include a vision for pathways that inform and include the full range of early childhood roles inclusive of adults working with all age ranges and in all settings with and on behalf of young children.

Suggested edits to existing text are underlined in the following, which also includes suggestions for re-ordering and/or eliminating some questions.

# 3.4.2 Workforce Element 2 - Career Pathways

**Definition** – For purposes of this section, <u>career pathways</u> (or career lattice) defines <u>the options and sequence of qualifications and ongoing professional development</u> for <u>state</u> roles. <u>Career pathways assist professionals in understanding the professional possibilities</u>, <u>planning for the achievement of increased qualifications</u>, and <u>linking advancement to appropriate compensation</u>.

	Children with disabilities, children with developmental delays, and children
	<u>with other special needs</u>
	Other. Describe
d) <u>H</u>	ow is the career pathway (or lattice) used?
	Voluntary guide and planning resource. Describe
	Required placement for all practitioners working in programs that are
	licensed or regulated by the State/Territory to serve children birth to 13.
	<u>Describe</u>
	Required placement for all practitioners working in programs that receive
	public funds to serve children birth to age 13. <u>Describe</u>
	Required placement for adult educators (those that provide training,
	education, and/or technical assistance). Describe
	Required placement for participation in scholarship and/or other incentive
	and support programs.
	Required placement for participation in the quality rating and improvement
	system or other quality improvement system. <u>Describe</u>
	Other. Describe
	re individuals' qualifications, professional development, and work experience
verif	ied prior to placement on the career pathway (or lattice)?
verif	ied prior to placement on the career pathway (or lattice)? Yes. Describe
verif	ied prior to placement on the career pathway (or lattice)?
verif	ied prior to placement on the career pathway (or lattice)? Yes. Describe No.
verif	ied prior to placement on the career pathway (or lattice)? Yes. Describe No.  ow does the State/Territory document and/or acknowledge an individual's
verif	ied prior to placement on the career pathway (or lattice)? Yes. Describe No.  ow does the State/Territory document and/or acknowledge an individual's of professional development and experience, in accordance with the
yerif	Yes. Describe No.  No.  Ow does the State/Territory document and/or acknowledge an individual's of professional development and experience, in accordance with the e/Territory career pathways (or lattice)? Check all that apply.
yerif	Yes. Describe No.  No.  Ow does the State/Territory document and/or acknowledge an individual's of professional development and experience, in accordance with the e/Territory career pathways (or lattice)? Check all that apply.  Provides increased compensation, single award, or other financial incentive
yerif	Yes. Describe No.  No.  Ow does the State/Territory document and/or acknowledge an individual's of professional development and experience, in accordance with the e/Territory career pathways (or lattice)? Check all that apply.  Provides increased compensation, single award, or other financial incentive for placement or movement on the career pathway. Describe
yerif	Yes. Describe No.  No.  Ow does the State/Territory document and/or acknowledge an individual's of professional development and experience, in accordance with the e/Territory career pathways (or lattice)? Check all that apply.  Provides increased compensation, single award, or other financial incentive for placement or movement on the career pathway. Describe  Provides a paper or electronic certificate of placement on the pathway.
yerif	Yes. Describe No.  No.  Ow does the State/Territory document and/or acknowledge an individual's of professional development and experience, in accordance with the e/Territory career pathways (or lattice)? Check all that apply.  Provides increased compensation, single award, or other financial incentive for placement or movement on the career pathway. Describe  Provides a paper or electronic certificate of placement on the pathway.  Describe
yerif	ied prior to placement on the career pathway (or lattice)? Yes. Describe No.  Ow does the State/Territory document and/or acknowledge an individual's of professional development and experience, in accordance with the e/Territory career pathways (or lattice)? Check all that apply. Provides increased compensation, single award, or other financial incentive for placement or movement on the career pathway. Describe Provides a paper or electronic certificate of placement on the pathway. Describe Holds an award or honor ceremony for individuals who achieve specific
yerif	ied prior to placement on the career pathway (or lattice)? Yes. Describe No.  No.  Ow does the State/Territory document and/or acknowledge an individual's of professional development and experience, in accordance with the e/Territory career pathways (or lattice)? Check all that apply. Provides increased compensation, single award, or other financial incentive for placement or movement on the career pathway. Describe Provides a paper or electronic certificate of placement on the pathway. Describe Holds an award or honor ceremony for individuals who achieve specific movement on the career pathway. Describe
yerif	ied prior to placement on the career pathway (or lattice)? Yes. Describe No.  Ow does the State/Territory document and/or acknowledge an individual's of professional development and experience, in accordance with the e/Territory career pathways (or lattice)? Check all that apply. Provides increased compensation, single award, or other financial incentive for placement or movement on the career pathway. Describe Provides a paper or electronic certificate of placement on the pathway.  Describe Holds an award or honor ceremony for individuals who achieve specific movement on the career pathway. Describe Other. Describe
yerif	ied prior to placement on the career pathway (or lattice)? Yes. Describe No.  No.  Ow does the State/Territory document and/or acknowledge an individual's of professional development and experience, in accordance with the e/Territory career pathways (or lattice)? Check all that apply. Provides increased compensation, single award, or other financial incentive for placement or movement on the career pathway. Describe Provides a paper or electronic certificate of placement on the pathway. Describe Holds an award or honor ceremony for individuals who achieve specific movement on the career pathway. Describe

# Sections 3.4.3 Workforce Element 3 – Higher Education Capacity and 3.4.4 Workforce Element 4 – Training & Technical Assistance Capacity

NAEYC recommends combining the current draft 3.4.3 and 3.4.4 into one section to encourage and highlight the importance of a single, integrated and comprehensive professional development system that addresses the continuum of workforce needs. In the current draft, singling out and highlighting a "training and TA system" diminishes this importance and provides an impression that a multiple or parallel systems approach is recommended.

NAEYC recommends changing the approach regarding higher education capacity in this section to one that state/territory administrators might be able to legitimately influence; in the current draft, the administrators do not typically have the authority to conduct some of the assessments or other activities. Faculty qualifications, course content and other requirements are set by the institution, the state higher education boards, and institution and/or program accreditors.

The specific mention in the training and TA capacity sub-section about cultural and diversity needs seems out of place since it has not been a clear theme throughout this section; in this current draft, its omission from the higher education portion suggests that IHEs do not also need to be culturally relevant and competent. NAEYC suggests highlighting these issues throughout the section rather than in only one aspect and globalizing the diversity issues so they also may include people/children of differing abilities; all professional development should address diversity, inclusion, and access issues.

NAEYC also suggests that training and education are not distinguished by the offering of credit. Some previous national work to define professional development methods and key terms made a sharp distinction between training and education related to the ability to provide or lead to higher education credit. However, there is now overlap in these definitions because of state PD systems' progress in building accessible career pathways (or lattices) that include credit options for some trainings. While training is not intended to always lead to or supplement a degree, the field has been moving towards training programs that are intentionally sequenced. These programs require more advanced qualifications of the adult educators who provide them as well as more stringent quality assurances related to training content and standards. Increasingly in these cases, there is an intentional connection with higher education and the ability to take trainings for or translate them into credit (from NAEYC and NACCRRA's draft PD definitions).

Suggested edits to existing text are underlined in the following, which also includes suggestions for re-ordering and/or eliminating some questions.

### 3.4.3 Workforce Element 3 – Professional Development Capacity

**Definition** – For purposes of this section, higher education capacity refers to capability of the higher education system to meet the needs of the <u>diverse</u> workforce <u>including the provision of</u> content that addresses <u>the full range of development and needs of young children.</u>

a) Has the State/Territory assessed the availability of early childhood and related
degree programs in the state (for example, locationboth physical location and
distance-based, degree level(s), etc.)?
☐ <u>Yes. Describe</u>
□ <u>No.</u>

<ul> <li>b) What quality assurance mechanisms are in place for the degree programs and courses offered by the state institutions of higher education? Check all that apply.</li> <li>Institution standards/processes</li> <li>Standards/processes set by the state higher education boards</li> <li>Standards/processes set by institution and/or program accreditors (national or regional, etc.). Describe.</li> <li>Other. Describe.</li> </ul>
c) Does the State/Territory have articulation agreements in place across and within institutions of higher education? Yes. Describe. No.
d) Does the State/Territory track degree completion or attrition rates?  Yes. Describe  No.
<b>Definition</b> – For purposes of this section, training and technical assistance capacity refers to capability of the training and technical assistance <u>offerings</u> to meet the needs of the <u>diverse</u> workforce <u>including the provision of</u> content that addresses <u>the full range of development and needs of young children</u> .
e) Has the State/Territory assessed the availability of early childhood and related training and technical assistance programs in the state (for example, location—both physical location and distance-based, level(s), types, etc.)?  Yes. Describe No.
f) What quality assurance mechanisms are in place for the training and technical assistance programs offered? Check all that apply.  Trainer and/or training approval processes. Describe Evaluations of trainings and/or technical assistance offerings. Describe Other. Describe
g) Does the State/Territory have articulation agreements that translate training and/or technical assistance into higher education credit?  \[ \text{Yes. Describe} \] \[ \text{No.} \]
h) Does the State/Territory track training and/or technical assistance program completion or attrition rates?  \[ \text{Yes. Describe} \] \[ \text{No.} \]

# 3.4.5 (re-numbered to 3.4.4) Workforce Element 5- Access to Training and Education

NAEYC suggests expanding this sub-section on access to include workforce access to all professional development offerings. Also, it may be helpful to define "easily accessible" somewhere in the preprint or at least in the guidance (or provide examples of what it means such as available online, etc.).

Suggested edits to existing text are underlined in the following, which also includes suggestions for re-ordering and/or eliminating some questions.

# 3.4.4 Workforce Element 4- Access to Professional Development (Training, Education, and Technical Assistance)

Definition – For purposes of this section, access <u>to professional development</u> (<u>training, education, and technical assistance</u>) refers to the degree to which practitioners are made aware of, and receive supports and assistance to utilize, professional development opportunities.

a) Is the State/Territory professional development system designed to serve
professionals in various or all sectors of the early childhood field?
□ <u>Yes.</u>
a-1) If yes, check all sectors that apply.
☐ <u>Child care</u>
☐ <u>Head Start/Early Head Start</u>
☐ <u>Pre-kindergarten</u>
$\square$ Schools
☐ Early intervention/special education
☐ <u>Other. Describe</u>
□ No. Describe the target sector(s) of the State/Territory professional development system.
D) Does the State/Territory have a State/Territory-wide, coordinated and easily accessible clearinghouse of information about <u>professional development</u> opportunities available to all members of <u>the workforce</u> ?
Yes. Describe
□ No
Insert web addresses, where possible:
insert wes addresses, where possisier
c) Does the State/Territory provide any of the following <u>financial</u> supports for
raining and education? Check all that apply.
☐ Scholarships. Describe
☐ Reimbursement for training expenses (for example, for travel and supplies)
<u>Describe</u>
☐ Grants. Describe

☐ Loans. Describe
<ul> <li>Loan forgiveness programs. Describe</li> </ul>
Substitute pools. Describe
Release time. Describe
☐ <u>Other. Describe</u>
<u>d</u> ) Does the State/Territory have career advisors <u>for the workforce</u> ? ☐ Yes. Describe
□ No.
e) Does the State/Territory have mentors, coaches, consultants, and/or other adu
educators available to provide technical assistance to the workforce?  Yes. Describe  No.
<ul> <li>f) Does the State/Territory offer peer groups, training or education program cohorts, and/or other peer support networks to support the workforce?</li> <li>Yes. Describe</li> <li>No.</li> </ul>
3.4.6 (re-numbered to 3.4.5) Workforce Element 6- Compensation, Benefits, and Working Conditions
Since working conditions are not the focus of any questions in this sub-section, NAEYO suggests changing the title to "Compensation and Benefits"; the working environment would seem most relevant for inclusion in Section 3.3 under the QRIS criteria and additional questions.
Suggested edits to existing text are underlined in the following, which also includes suggestions for re-ordering and/or eliminating some questions.
3.4.5 Workforce Element 5- Compensation and Benefits
<b>Definition</b> – For purposes of this section, rewards for education and training refers to any financial supports provided to practitioners for participating <u>in</u> and completing education or training or for increasing compensation.
<ul> <li>a) Does the State/Territory have a suggested or required salary or wage scale for various professional roles?</li> <li>Yes. Describe (including for what roles and how amounts are formulated)</li> <li>No.</li> </ul>
<ul> <li>b) Does the State/Territory provide financial rewards for participation in professional development, such as one-time salary bonuses for completing a training or education program?</li> <li>☐ Yes. <u>Describe</u></li> </ul>

□ No
c) Does the State/Territory provide sustained <a href="mailto:financial">financial</a> support on a periodic, predictable basis, such as <a href="mailto:annual">annual</a> wage supplements <a href="mailto:based on the highest level of training and education achieved">achieved</a> ? <a href="mailto:Territory provide sustained financial">financial</a> support on a periodic, predictable basis, such as <a href="mailto:annual">annual</a> wage supplements <a href="mailto:based on the highest level of training and education achieved">annual</a> yes. Describe <a href="mailto:Describe">Describe</a> <a href="mailto:No">No</a>
d) Does the State/Territory have a program to offer or facilitate benefits (for example, health insurance coverage, retirement, etc.) to <a href="mailto:the workforce">the workforce</a> ?  □ Yes. Describe □ No
e) Does the State/Territory's QRIS (if checked yes to 3.3.6a) include activities linked to <u>compensation or benefits</u> ?  ☐ Yes. Describe ☐ No.
Suggestions for new subsection 3.4.6 on Governance
NAEYC suggests the addition of a new subsection on professional development system governance. This is particularly cogent information as state early learning advisory councils are formed and professional development subcommittees/advisory structures are recommitted or newly developed. This new subsection could capture state progress on advancing integrated systems as well as the Lead Agencies' role in the efforts.
Though this is a suggestion for a new section, some language from previous questions related to coordination have been inserted in this section; new text or edits to existing text are underlined in the following.
3.4.6 Workforce Element 6 - Governance
<ul> <li>a) Is there a single State/Territory advisory structure for the professional development system?</li> <li>\(\sum \text{Yes.}\)</li> </ul>
a-1) If yes, which sectors of the early childhood field are part of the advisory body? Check all that apply.  Child care Head Start/Early Head Start Pre-kindergarten Schools Early intervention/special education Other. Describe
a-2) Is the advisory structure a subcommittee or workgroup of the overarching State/Territory early learning advisory council?

□ <u>Yes. Specify</u>	
$\square$ No.	
a-3) Has the advisory structure developed or approved any of the following planning and communication mechanisms for the	
9.	
State/Territory professional development system? Check all that apply.	
Mission statement	
☐ <u>Vision statement</u>	
Goal(s) statement	
☐ <u>Strategic plan</u>	
☐ <u>Other. Describe</u>	
Insert web addresses, where possible:	
<ul> <li>a-4) What is the Lead Agency's role on or relationship with the professional development advisory structure?         Describe.     </li> <li>No, there are multiple advisory structures for the State/Territory professional development system. Describe.</li> </ul>	<u>_</u>
<ul> <li>No, there is not an advisory structure for the State/Territory professional development system.</li> </ul>	
b) Does the State/Territory have a specific training and technical assistance infrastructure in place to provide oversight and coordination of all publicly funded, professional development opportunities provided outside of institutions o higher education? [this question was originally 3.3.4a]  ☐ Yes. Describe (including relationship to the system advisory structure as appropriate)  ☐ No.	<u>f</u>

## 3.4.7 Data & Performance Measures on the Child Care Workforce

NAEYC suggests expanding the data collection minimums listed to include the range and diversity of state/territory workforces rather than narrowly focusing on "teachers". In order to track progress on data items and Lead Agencies' role in these efforts, it would also be helpful to insert clarifying questions about which agency (Lead or Partner) collects which information.

NAEYC also suggests a careful check on edits to ensure that references to the State/Territory professional development system are singular (rather than the plural "systems"; even if states have multiple professional development efforts, a single, integrated system should be encouraged).

Because specific quality assurance related questions are included throughout the 3.4 section, it may be helpful to encourage Lead Agencies to cite the previous information as appropriate rather than try to repeat information in the evaluation section. This possible duplication issue could also be avoided entirely by focusing the evaluation question

solely on system and workforce level evaluations rather than any and all evaluations of professional development efforts.

Suggested edits to existing text are underlined in the following, which also includes suggestions for re-ordering and/or eliminating some questions.

a) Data collected on the child care workforce. At a minimum, indicate

**3.4.7 Data & Performance Measures on the Child Care Workforce and Professional Development System** – What data elements is the State/Territory currently collecting on the child care workforce? What performance measures does the State/Territory use to determine its progress on professional development and workforce initiatives?

if t	he Lead Agency or a partner agency collects:
	Data on the size of the child care workforce
	Data on the <u>demographic</u> characteristics of <u>practitioners working directly with</u>
	young children
	Records of individual practitioners and their qualifications
	Records of individual adult educators (those that provide training, education,
	and/or technical assistance) and their qualifications
	Qualifications of practitioners linked to the programs in which they teach
	Number of scholarships awarded
	Number of individuals receiving bonuses or other financial rewards or
	<u>incentives</u>
	Number of credentials and degrees conferred annually
	Other. Describe
neg and De sys cha cha ver	Does the State/Territory have a workforce data system, such as a workforce distry, which tracks workforce demographics, compensation, and qualifications dongoing professional development?  finition—For purposes of this section, a workforce and professional data stem refers to a system, such as a workforce registry, that tracks the size and practeristics of the child care workforce, including longitudinal data to monitor anges over time. The data system also can produce records to validate and rify qualifications or ongoing professional development for licensing, creditation, QRS, wage incentives, and credentials.
	Yes.
	<ul> <li>b-1) If yes, which roles are included in the workforce data system?</li> <li>Check all that apply.</li> <li>□ Practitioners working directly with children in centers or schools (including aides, assistant teachers, teachers, and master teachers).</li> </ul>

			Practitioners working directly with children in family child care
			homes (including aides, assistants, and providers). Describe
			Administrators in centers or schools (including educational
			coordinators, directors, principals, etc.). Describe
			Technical assistance providers (including mentors, coaches,
			consultants, home visitors, etc.) Describe
			Education and training staff (such as CCR&R staff, trainers,
			<u>faculty</u> , etc.). Describe
			Other. Describe
		,	Does the workforce data system <u>include the following (check all</u>
			apply):
			All practitioners working in programs that are licensed or regulated
		_	by the State/Territory to serve children birth to 13?
			All practitioners working in programs that receive public funds to
			serve children birth to age 13?
_			
	No.		

- c) **Performance Measures**. What performance measures does the State/Territory use to track progress in its workforce and professional development systems?
- d) **Evaluation**. What are the Lead Agency's plans for evaluation related to its workforce and professional development <u>system</u>? Evaluation can include efforts related to monitoring implementation of an initiative, validation of standards or assessment tools, or looking at outcomes in programs or the system and may be ongoing or conducted periodically. (<u>Please refer back to specific sub-sections of 3.4 as appropriate</u>).

Goals for the next Biennium - What are the State's/Territory's goals for building the professional development system and improving conditions for the workforce in the coming biennium? Consider projected progress across the elements of the workforce and professional development system described above <u>as well as the system mission</u>, vision, goals and strategic plans (as appropriate), and offer as many specifics as possible (e.g. implement wage supplement program, develop articulation agreements, increase the number of BA graduates of early childhood programs by 10%, etc.).

### **Appendix 1: Quality Performance Report**

# 2.2 Key Data

### 2.2.1

This question would benefit from explicit parameters that this is about the proportion of providers receiving CCDF funds. Please refer as well to our comments to insert an

additional question following 3.2.3 on what types of providers are required to implement the state early learning guidelines.

# 3.1 Progress on Overall Goals

#### 3.1.1

It may be useful to split this into 2 questions - one that focuses specifically on fully implemented (whether statewide or pilot) QRIS and one that focuses on "other program quality improvement activities," which would need to be spelled out, as previously mentioned.

# 3.2 Key Data

### 3.2.1

NAEYC recommends the following edits and additions to the standard areas; suggested edits to existing text are underlined in the following, which also includes suggestions for re-ordering and/or eliminating some questions (these recommended areas are consistent with the suggestions presented earlier for the preprint 3.3.1 Element 1 – Program Standards):

Ratios and group sizes
Health, <u>nutrition</u> , and safety
Learning environment and curriculum
<u>Teacher-child relationships</u>
<u>Teaching (instructional) practice</u>
Staff qualifications and professional development
Family partnerships and family strengthening
Community relationships
<u>Program</u> administration and management
<u>Cultural competence</u>
Child assessment for the purposes of individualizing instruction and/or targeting
program improvement
Developmental screenings

### 3.2.3

The data for QRIS should be separate from the data for "other quality improvement system" in order to avoid inflation of the participation rate in a state that may have various quality improvement initiatives in addition to a QRIS.

### 4.2 Key Data

NAEYC recommends that the questions in this section use one consistent term or phrase to refer to the portion of the workforce for whom data is sought; this section currently includes "teachers/caregivers," "teachers and caregivers," and "teachers" (e.g., in 4.2.6 secondary questions).

#### 4.2.1

NAEYC suggests adding an additional category of "graduate/advanced degrees" to the table.

### 4.2.3

This question would benefit from having explicit parameters, e.g., is this about professional development supported by CCDF dollars? Or about any professionals that are in the registry?

NAEYC also suggests the following language change to this question (addition is underlined):

4.2.3 How many teachers/caregivers received credit-based training <u>and/or education</u> as of the end of the last fiscal year?

### 4.2.4

It is unclear what "through institutions participating in the professional development system" means. NAEYC suggests removing that language in this question or including specific clarification. Also, it would be helpful to add clarification on timeframe to this question: is the goal to quantify how many credentials and degrees were awarded during the specific year? If so, it would be helpful to specify that expectation in the question.

### 4.2.5

NAEYC recommends changing the language in this question from "received coaching or TA" to "received technical assistance such as coaching, mentoring, or consultation".

# **How Were CCDF Quality Funds Spent?** 5.1

NAEYC suggests changing the language in the column category of "Workforce and Professional Development Activities (e.g., Training, Coaching, Scholarships)" to "Workforce and Professional Development Activities (e.g., Training, education, and compensation)."