Specific Comments on the Draft CCDF Pre-Print
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November 23, 2010

1.2 Estimated Funding – Many of the states with whom we work use funds other than CCDF federal funding, or CCDF state match, to support early care and education services. Under part 3, Quality Improvement activities, the pre-print specifically says "While one of the key goals for CCDF is helping more low-income children access higher quality care, the Lead Agency should consider its goals and strategic plans for a child care quality improvement system for all families, not just those receiving assistance under CCDF." Data on how much is being spent for this purpose, even if it isn't CCDF or state match, would be enormously helpful for planning and analysis purposes.

1.6.3 Governance and Management – We suggest expanding this to include integrated management models like the one used in PA and MA. Our work suggests that more states may be moving toward unified governance, and it would be helpful to include it among the list of suggestions.

2.6.4 Market Rate Survey – Asking for a copy of the MRS survey instrument, as well as the results, is excellent. This will greatly improve our capacity to understand what states are doing and more understand the results.

We think that cost modeling, based on QRIS, is a very powerful tool. Some states are also conducting studies/surveys aimed at gathering information on the cost (rather than the price) of providing ECE in various settings. To this end, we'd suggest asking states to share that information. You could ask:

> Has the State analyzed the cost of delivering child care services at various quality levels and/or in various settings? YES___   NO____   If yes, please attach a link to, or copy of , the study

> The State uses the results of the cost analysis (described above) to inform financial incentives for programs, practitioners and consumers. YES___ NO___

2.6.6 Differential rate for infants and toddlers – this is confusing. It is our understanding that states are required to set rates based on the type of care and age of child, so we aren't sure why this would qualify as a 'rate differential'.

3.1.1. Compliance with Applicable State/Territory and Local Regulatory Requirements on Licensing -- appears to exclude "registration or certification requirements for providers solely to provide services for which assistance is provided under the CCDF" but makes no mention of requirements for programs that receive funding from the State Education Department. If the intent is to clarify that licensing is a legal standard and not a funding standard, then perhaps it is more appropriate to say "....for which assistance is provided under the CCDF or other state or federal funding stream."

Also, b)1 (under this same section) - We suggest the addition of check boxes for prekindergarten programs operated by private schools (many states exempt them) as well as also center-based programs that operate for less than __ hours a day. (NYS, for example, exempts center-based programs that operate for less than 3 hours a day.) Perhaps these options will be picked up under the "other" category, but given that many states that do this, a check-box might make for easier data collection.

> And under Family Child Care Homes (on page 32) adding a check box that says "__based on the number of hours children are in care" would be appropriate. Many states do not regulate a provider who cares for children less than __ hours a day (in NYS the threshold is 3 hours).

3.1.2 d) Does the State/Territory have on-line tools or other "search tools" available to parents and the public to view child care program licensing status and compliance records?" If the intent is to include QRIS search tools in this question then this should be made clear. If not, then the preprint should reference where you do want answers that are related to QRIS and not licensing alone.

On **3.2.6 Do the early learning guidelines align with other standards in the State/Territory? If yes, please describe.** It might be helpful to add a check-box for State PreK Standards or Guidelines and for QRIS standards.

In 3.3.1 the preprint says "Licensing and health and safety requirements are also standards but should not be included here since they were addressed in sections 3.1" However, the items you are asking states to check – ratios, curriculum, etc – were not asked under the health and safety section, so you are likely to get misleading information if a state has high licensing standards (that include a lot of the items on the list) and uses licensing as a base requirement for QRIS. We suggest two ways to address this issue:

> 1) Amend the language to say "Licensing and health and safety requirements are also standards but should only be included here if licensing is a base requirement for participation in the state's QRIS or Quality Improvement

<u>Standards.</u>

2) Or, and alternative (and our preference) would be to combine responses for licensing and QRIS into a single table. You could have a check-list with three columns: state licensing standards, state QRIS standards, other standards. Then states could go through the list of quality indicators and check each one that applies based on where they hold programs accountable (e.g. in licensing, or in QRIS or in another quality standard.)

We would also suggest adding Classroom Assessment (using ERS, CLASS or other research-based tool) to the list of quality measures.

And we commend you for including developmental screenings on the list. This is an important element, and one that needs increased focus if we are to effectively link standards and child outcomes.

3.3.2 Non-Monetary Supports - under a) Identify which types and methods you use to support to child care programs in the following chart,

1. we are confused by the check box that says "health" and do not understand what information you are seeking there.
2. We would omit social-emotional development and family engagement as supports; these are typically standards in a QRIS, and it's possible that states would provide TA linked to those standards, but these would not be spelled out as specific non-monetary supports otherwise.
3. Similarly, we would recommend clarifying "education curriculum and assessment/classroom practice other than or in addition to targeted QRIS support"
4. Similarly, we would recommend clarifying "Infant and toddler development other than or in addition to targeted QRIS support."

The point here is that states either have non-monetary supports that are directly linked to the QRIS, and therefore are guided by the standards and an improvement plan (which is what you ask in b, below) or they have other non-monetary supports that are NOT linked to QRIS. We assume that information is what you are seeking above and therefore suggest that you make that clear.

Additionally, we would recommend adding a check-boxes that say:

___attaining and maintaining QRIS standards"

___attaining and maintaining OTHER quality improvement standards Describe_____"

b) Is your State/Territory's support to programs individualized, based on the results of the quality assessment? Does it include an individualized improvement plan? We suggest an alternative approach, which would ask the following question and include the following check-boxes:

How do you measure the effectiveness of supports described in 3.3.2 ?

> __ require on-site consultants to report pre and post QRIS status of sites with whom they work
> __require on-site consultants to report pre and post data on quality improvement using an ERS or other classroom assessment tool
> __require trainers to comply with trainer qualifications and/or trainer registry
> ___require trainers to conduct pre- and post- tests
> __require other evaluation of on-site consultation or training Describe_____

It would be very helpful to include a question regarding the amount of TA that is available and whether or not the state knows if services are available in high-need areas. For example, you could ask the state to estimate what % of programs receive non-monetary supports, or – more importantly -- what % of programs in communities of high need (e.g. culture, language, etc.) receive these supports.

Under 3.3.3 , the tax credit option ought to say "business tax credits tied to meeting quality standards" and we would recommend adding another one that says "refundable tax credits tied to meeting quality standards"

This section appears only to address financial incentives for ECE programs (and not for practitioners) so we recommend making that clear in the title.

On the table in 3.3.4 a) How do you assess and monitor the quality of programs? We recommend that, instead of listing the type of provider across the top of the table, list the type of quality standard, e.g. QRIS, licensing, PreK monitoring, other quality initiative (Describe).

3.3.4. b) Has the State/Territory taken steps to establish reciprocity with or alignment with any of the following assessments used in other quality assessment systems in order to minimize duplication? What you mean by reciprocity is not clear. Also, it will be important to clearly exactly define what is meant by the word assessment.

3.3.4. C) the term "child assessment" can be interpreted in many ways. There are different assessment tools for different purposes, and there are tools focused on classrooms (e.g. ERS, CLASS) and tools focused on children (e.g. Ages and Stages, Work Sampling); you might want to either be more specific or create a table that allows states to indicate which tool(s) they use for which programs/children. The latter approach would have the added benefit of ensuring that a state could potentially answer the question in the affirmative even if they are using an

assessment tool in one, small program.

3.3.6 b) suggest adding early intervention programs as a check box

3.3.7 Data and Performance Measures – We recommend expanding data elements to be more specific. Suggestions are included below:

1) Data on ECE program scope, location, services

a) the State/Territory has established a unique program identifier that applies to the following establishments in the ECE system

---Yes

----No

If yes, the unique identifier includes the following programs(check all that apply)

___ licensed or regulated center-based child care

___license- or regulation-exempt center-based child care

___licensed or regulated home-based child care

___license- or regulation-exempt home-based child care

___Head Start program

___early childhood program located in public school

___early childhood program located in private school

___early childhood program operated by an early intervention services provider

___before-or after-school program

b)The State has established a unique practitioner identifier that applies to practitioners in all sectors of the system.

---Yes

----No

If yes, the unique identifier includes the following practitioners (check all that apply)

___ practitioners employed by licensed or regulated center-based child care

___practitioners employed by license- or regulation-exempt center-based child care

___licensed or regulated home-based child care practitioners

__license- or regulation-exempt home-based child care practitioners

__practitioners employed by Head Start program

__practitioners employed by early childhood program located in public school

__practitioners employed by early childhood program located in private school

__practitioners employed by early childhood program operated by an early intervention services provider

__practitioners employed by before-or after-school program

c) The unique practitioner ID described in b) above can be linked to the programs in which the individual is/has been employed, as described in a) above. ___yes ___ No

d) The State has developed a single set of data definitions for key data elements on ECE program structure that can be applied all sectors of the ECE system

__yes ___ NO

e) The State has developed a single set of data definitions for key data elements on practitioners that can be applied to staff working in programs of differing auspice. __yes ___ NO

f) The State collects and reports unduplicated data on ECE supply across all sectors by location, enrollment, and duration of operation.

__YES ___NO

G) The State collects and reports unduplicated data on the early childhood and school-age workforce across all sectors by demographics, compensation, and education levels. __ yes ___NO

h) The State collects and reports unduplicated data on ECE supply across all sectors, including information in e) above and on program quality. __yes ___NO

1) The State regularly reports on trends over time in the supply and quality of ECE overall and for specific populations, such as low-income children, children with working parents, or children with disabilities. _ yes __ NO

3.4.1 Workforce Element (b) – suggest the following additions

__These roles only include staff in private-sector child care programs

__These roles only include staff in programs operated by the State Education Department or other public sector entity

__These roles include staff in both private- and public-sector programs.

3.4.2 Workforce Element 2 - Career Ladder (b) -- we suggest the following additions:

__These roles only include staff in private-sector child care programs

__These roles only include staff in programs operated by the State Education Department or other public sector entity

__These roles include staff in both private- and public-sector programs.

3.4.4 Workforce Element 4 -Training & Technical Assistance Capacity

This section is not really about Training and Technical Assistance but focuses instead on training quality. Thus, we suggest that it be called Training Quality Assurance and say "for purposes of this section quality assurance refers to methods the state has put in place to ensure that the training offered ECE and school-age providers effectively helps them attain credentials and/or increase program quality as measured by QRIS or other statewide quality standard, with particular emphasis on the need of culturally and linguistically diverse children."

Suggest that a) be eliminated because it implies that a T/TA system is needed to provide oversight of professional development activities. We do not believe this to be the case.

The question on mentors/coaches d) needs clarification, and we suggest: Does the state/territory have mentors/coaches available to help with the ECE/SACC workforce attain required credentials and/or meet required standards? Yes__ NO__ If yes, estimate:

__ what percentage of the ECE workforce has access to these mentors/coaches

__ what percentage of the SACC workforce has access to these mentors/coaches

We would also suggest addition of a question that relates to the issue of emphasis on the need of culturally and linguistically diverse children, such as:

-- Has the state mapped the availability of training opportunities, approved trainers or mentors/coaches in communities where large numbers of culturally and linguistically diverse children reside? Or

---Has the state taken steps to ensure the availability of training opportunities, approved trainers or mentors/coaches who speak the primary language in communities where large numbers of culturally and linguistically diverse children reside?

Under 3.4.5, c) in relationship to career advisors, a threshold question could be helpful, including:

___ what percentage of the ECE workforce has access to these career advisors

___ what percentage of the SACC workforce has access to these career advisors

3.4.6 d) Does the State/Territory's QRIS include activities linked to compensation, benefits or working conditions? – is not clear. It is hard to understand what information you are seeking.

Under 3.4.7 a) we would suggest adding a matrix next to the list that includes the various ECE sectors so that they can check off to which sector the issue applies. For example:

---Data on the size of the ECE workforce applies to (check all that apply) __Licensed child care __preK __Head Start __ Early Intervention

...and carry on in a similar fashion for each item on the list.