

**Child Care and Development Fund Plan for States/Territories for  
FFY 2012-2013 (ACF – 118)  
Draft for Public Comment – September 24, 2010**

**National Association for Regulatory Administration (NARA) Comments  
November 20, 2010**

**Introduction:**

- NARA appreciates the level of attention given to licensing in this draft plan and applauds the Department for making licensing improvement one of its priority issues. The CCDF Plan has made major advances in this area and is an excellent mechanism for assisting states to improve their licensing standards and programs and for measuring their progress.
- Do you have data on the percentage of subsidy funds used to subsidize child care in unregulated care?
  - We are concerned with the number of programs that are exempted from licensing for all care and the large number exempt from licensing as family child care. This information would be of help as the field addresses the issue of exemptions and how best to assure that all children in out of home care are protected equally.
- We note that In-home Child Care Providers are included in 3.1.2 Enforcement of Licensing Requirements, which is problematic since we are not aware of any state that licenses in-home child care providers as they do not license babysitters or other care in the child's own home. We recommend a separate section for In-home child care. We strongly recommend that you make sure to separate health and safety for licensed programs from health and safety for license exempt providers.

**Specific comments:**

- **Page 9, 1.5.1 Table 1.5.1**
  - Add **State/Territory responsible for child care licensing to this consultation list.**
- **Page 33, 3.1.2 Enforcement of Licensing Requirements, Describe how your State/Territory's licensing requirements are effectively enforced, a) Use of announced and unannounced visits**
  - Add to the chart – **Use of random statistical weighting or risk-based methods to determine license schedule**
  - Add **"Other, Describe"** to **Center-Based Child Care**

- **Page 37, 3.1.3, Compliance with Applicable State/Territory and Local Regulatory Requirements on Health and Safety**
  - As Licensing is receiving increased focus in this Pre-Print, it would be beneficial to ask about how states are integrating their licensing functions into their larger early childhood system building initiatives. For examples:
  - **How are the licensing regulations on pre-service and on-going professional development aligned with the early childhood professional development system?**
  - **How are licensing regulations aligned with the State’s Early Learning Guidelines?**
  - **How are licensing regulations aligned with QRIS standards?**
  - **Do the licensing regulations link with the child assessment system? If so, how?”**
  
- **Page 41, 3.1.4, Data & Performance Measures on Licensing and Health and Safety Compliance, a) Data collected on licensing and health and safety**
  - Revise item 4 – Number of injuries and fatalities in child care as follows:
    - **Number of serious injuries that require hospital treatment**
    - **Number of fatalities that occurred in child care**
  - Add
    - **Number of monitoring visits prior to licensing and after licensing (during the license period)**
  - Add
    - **Number of programs determined ineligible for CCDF and dropped from the program**
  
- **Page 41, 3.1.4, b) Performance Measurement and c) Evaluation**
  - There is not a clear enough distinction between b) and c). Do you want this degree of openness in the questions? The intent of these items could be more clearly stated to assure that states understand what information and data are desired here.
  - Item c) is especially unclear. We suggest adding suggested measures as examples such as: **reducing number of violations in critical regulation areas, inspections conducted on time and in accordance with licensing administrative policies and procedures.**
  
- **Page 42, 3.1.5, Goals for the next Biennium.**
  - We feel that this section should address the concept of thinking about the licensing system as a whole and the goals they have to elevate the licensing system to increase its effectiveness in protecting children in out of home care; to put it another way - where are they trying to take their licensing system?
  
- **Page 45, 3.3.2 Element 2 – Non-Monetary Supports, a) Identify which types and methods you use to support child care programs in the following chart.**
  - Add another column – **“Provider of Support” and “Amount of Support Provided”**

- **Page 47. 3.3.4 b. Has the State/Territory taken steps to establish reciprocity with . . . . minimize duplication?**
  - o This is an excellent question and is well done.