



The North Carolina  
Partnership for Children, Inc.

## NCPC CCDF Plan Preprint Review 29 November 2010

The North Carolina Partnership for Children, Inc. (NCPC) appreciates the opportunity to share our feedback on the proposed CCDF Plan Preprint for FFY 2012-13. Overall, we believe the Plan lays the foundation for improvements in services to children and families that will 1) enhance families' capacity to provide stable, quality care for their children while they work, and; 2) positively impact child outcomes. We commend the Office of Child Care for developing a Plan that guides best practice, while at the same time provides flexibility for states to design strategies that best fit within their early childhood infrastructures.

Our comments below are organized by the section, item number, and page number that corresponds to the draft Plan for public comment issued on September 24, 2010.

### Part 1 – Administration

1.5.1 (Table – Lead Agency Consultation Efforts): Suggest also including “state-to-local early childhood initiatives, such as Smart Start, First Things First, First Five and State Child Care Resource & Referral Networks,” to the list of agencies with whom the Lead Agency consulted with in the development of the Plan. (page 9)

1.6.1 (Table – Lead Agency Coordination Efforts): Suggest also including “state-to-local early childhood initiatives, such as Smart Start, First Things First, First Five and State Child Care Resource & Referral Networks,” to the list of agencies with whom the Lead Agency coordinates with in the delivery of child care and early childhood services. (pages 10-11)

1.6.2: Suggest defining a “formal early childhood coordination plan”. Specifically, what parts of the early childhood system should be included in the plan (early care and education, health, family support, etc.)? Is there a specific entity that should have ownership of this plan? Also, suggest providing clarifying language describing the different “systems” within a broader early childhood system, such as Head Start, Child Care Resource & Referral, Pre-K and state-to-local initiatives such as Smart Start. It might also be helpful to include an entire section on governance, as a variety of structures may have responsibility for different “systems” within the broader early childhood system, such as professional development, QRIS, etc. (page 12)

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## **Part 2 – CCDF Subsidy Program Administration**

General Comments: Recommend including child-level data in this section, so it would be possible to link program data to teacher and child data. Also suggest adding language throughout this section that speaks to cultural diversity, relevance and competence.

2.1.4, 2.1.5, 2.1.6, 2.1.7: NCPC applauds and strongly supports the Office of Child Care’s (OCC) effort to address access, quality, and continuity of care for children eligible for child care subsidies. We appreciate OCC’s attempt to align policy and practice with what research consistently demonstrates: that children from low-income families benefit most from high-quality early care and education experiences. (pages 15-16)

2.2.5 (e – tiered reimbursement): NCPC appreciates OCC’s suggestion that poor working families may need continued subsidy support to maintain employment and meet their families’ most basic needs. Allowing families to continue to receive subsidy support, even when they earn slightly above program entry eligibility criteria ,keeps families working – a critical factor in ensuring our nation’s economic recovery. (page 21)

2.4.3: Suggest adding the following questions regarding the Lead Agency’s waiting list status: 1) If Lead Agency does not currently maintain a waiting list, and is not serving all eligible families, why not? 2) If Lead Agency does maintain a waiting list, how is it used? (page 24)

2.5.2: Suggest collecting the languages in which these sources of information are available.

2.6.6: NCPC supports OCC’s inclusion of questions to guide state practice toward providing differential rates for high-quality and hard-to-find care options. (page 29)

2.6.9: NCPC strongly supports OCC’s effort to address equal access to care comparable to that provided to families not eligible for CCDF assistance. State market rates have been artificially depressed for so many years that providers can’t afford to provide quality services at market rates, and CCDF eligible families cannot afford to pay the differential in actual provider fees and the market rate. (page 29)

## **Part 3 – Health and Safety and Quality Improvement Activities**

General Comments: 1) When referencing core knowledge and competencies in this section, suggest specifying as *formal, written, and adopted set of core knowledge and competencies*. 2) When referencing *training* in this section, suggest separating into support for college credit-professional development and in-service training. 3) Suggest adding language throughout this section that speaks to cultural diversity, relevance and competence.

3.2.5, 3.2.7: Suggest clarifying this section. It is not clear how early learning guidelines are “incorporated” into other parts of the system, or what it means to “implement” and “attain” early learning guidelines. It appears there is a missing conceptual link in these questions. The

intermediary between early learning guidelines (what children should generally know and be able to do) and implementation seems to be developmentally appropriate curricula and teacher core knowledge and competencies that in turn support children's attainment of the knowledge and skills outlined in the early learning guidelines. Suggest questions are reworded to reflect this. (page 43)

3.3.1 (a): Suggest asking for an explanation for each quality indicator NOT checked. (page 41)

3.3.1 (d): Suggest this question be reworked to address how quality improvement standards align with other state or national standards. Need to be consistent about aligning *program* level standards and not include early learning guidelines in the list. (page 45)

3.3.2: Suggest reframing the non-monetary support into three questions:

1) What types of support do you offer to child care programs?

- o Information or written materials
- o Training
- o Onsite Consultation

2) What is the purpose of the support?

- o Attaining and maintaining licensing compliance
- o Attaining and maintaining higher quality standards
- o Improving instructional practice of early childhood professionals

3) Is your State/Territory's support to programs individualized, based on the results of quality assessment? Does it include an individualized improvement plan? (same as the current item b in this section.) (pages 45-46)

3.3.4 (a): The question does not appear to align with the answer categories. Perhaps the question is:

a) What tools do you use to establish and assess program quality? Also, suggest including other administrative data that might be used to assess and monitor program quality, such as ratios, provider education/qualifications. (page 47)

3.3.4 (c): Suggest including questions about who is responsible for conducting and using the child assessment data. Also suggest adding an additional question that asks about population-level outcomes that may be used in addition to or instead of child outcome or assessment data, such as percentage of all children in regulated and higher levels of quality, subsets of children (such as those receiving public subsidies or with special needs) in higher quality care, etc. (pages 47-48)

3.3.7: Recommend adding number of children enrolled at each level of quality, and number of children in programs that move quality levels annually (up or down). (page 49)

3.4: NCPC commends OCC for including the Pathways to Excellence for the Workforce section, recognizing that research consistency shows that the quality of the interaction between teachers and children is the greatest predictor of the overall quality of the care children receive. (page 50)

Final Comment: Successful implementation of the new Plan requires that State/Territories build their capacity to collect, track and analyze data effectively. NCPC strongly agrees that it is critical to have this data to continually improve the quality of services for children and families and measurably track progress. To that end, NCPC suggests adding the following two questions: 1) What funding sources are currently used to support your early childhood data collection system? (List possible sources) 2) Who is included in the system? (for example, licensed child care, Head Start, PreK, CCDF subsidy, etc)