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November 22, 2010

Attn: ACF Reports Clearance Officer
Administration on Children and Families
Office of Administration, Office of Information Services
70 L'Enfant Promenade SW
Washington DC 20447
infocollection@acf.hhs.gov

RE: Child Care and Development Fund Plan for States/Territories for FFY
2012-2013 (ACF-118)

On behalf of the Alameda County California Child Care Planning Council,
we are submitting the following comments on the CCDF 2012-
2013 Draft Plan Preprint:

Part 1: Administration

Reference: 1.5 Lead Agencies are required to consult with appropriate
agencies in the development of its CCDF plan.

First Comment: On page 9 Consultation is defined as "meeting with or
otherwise obtaining input from an appropriate agency in the
development of the State or Territory CCDF Plan. At a
minimum, Lead Agencies must consult with representatives of
general purpose local governments."

In California, Child Care Planning Councils were formed when the Child
Care and Development Block Grant was created. In the most
populous state in the Union where many counties have larger
populations than many states, we feel it is impossible to
effectively meet the needs of California's families without local
planning. We feel the preprint should have stronger language
on obtaining local input. States should be required to conduct
local input sessions to develop the plan. In large states like
California, entities like Planning Councils should be responsible
for collecting and disseminating local input.

To our knowledge local input sessions and genuine consultation with local
government have not happened in recent years, and local input
from presiding governmental agencies is crucial to meeting the
child care needs of eligible families.

Reference: 1.6 Coordination Activities to Support the Implementation of
CCDF Services

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Second Comment: The middle of page 10 states: “Lead Agencies are required to *coordinate* with other Federal, State, local, tribal (if applicable) and private agencies providing child care and early childhood development services.” In the checklist the Lead Agency is **required** to coordinate with “representatives of local government, including local human services, education, or public health agencies.”

Child Care Planning Councils are already mandated to do this at the local level. Please amend this checklist to require or allow states like California to describe how this coordination happens at the local level. Again, in a state as big as California, it is crucial to conduct and adequately fund local

planning to meet the community's needs. In Alameda County alone, over \$175 million dollars is administered by over 30 separate agencies, including seven Head Start grantees, seven alternative payment (voucher) agencies and over 30 public and private agencies administering center-based subsidies.

Reference: 1.6.3 "Does the State have a designated entity responsible for coordination across early childhood and school-age programs?" Check all that apply.

Third Comment: In this section on page 12 the options are a statewide early childhood cabinet/advisory council/task force/commission, the State Advisory Council (our ELAC), or Other. Please add a fourth option called "local coordination." California's and other states with large populations necessitate **local** as well as state coordination to meet children and family's needs.

Reference: 1.7 Child Care Emergency Preparedness and Response Plan

Fourth Comment: The top of page 13 states: "It is recommended that each Lead Agency develop a plan to address preparedness, response, and recovery efforts specific to child care services and programs." California is such a big state that **local** child care disaster preparedness plans are needed. Local child care entities such as Planning Councils are well suited to coordinate local disaster plans due to their mandated connection with local government. Child care is barely mentioned in most local governmental disaster plans. Please add a section here to allow States to describe their local efforts in this area. Connecticut is using ARRA child care funding to work with Save the Children to develop a comprehensive child care plan in the event of a disaster. The results of their planning should be shared with other states, and the requirement for a State/Territory disaster plan should be considered for future CCDF plan preprints.

Reference: 3.3.4 Creating Pathways to Excellence for Child Care Programs Through Program Quality Improvement Activities Including Quality Rating and Improvement Systems (Component #3) Quality Assurance and Monitoring

Fifth Comment: Alameda County has developed a Statement on High Quality ECE Principles and Standards that can be accessed here: <http://www.acgov.org/childcare/documents/ECEQualityStatement.pdf>. We believe this document goes beyond checklists and encourages users to pursue continuous quality improvement. County stakeholders are currently using this document in a variety of child care, Head Start and adult learning settings through the County. We urge you to consider ways to adjust the Preprint to incorporate the inclusion of alternative documents such as our Statement in this section.

Reference: 3.4.6 Pathways to Excellence for the Workforce – Professional Development Systems and Workforce Initiatives (Component #4) Workforce Element 6 – Compensation, Benefits and Working Conditions

Sixth Comment: This section is mentioned last in the Preprint, but we believe it is THE most important element in this entire plan. We would like to see this section strengthened and parts of it **required** for States and Territories. Years of solid research has shown that inadequate compensation leads to high turnover which leads to lower quality care and

education for children who need it most. Our field has little chance of improving quality without increasing compensation and working conditions for our teachers and providers.

Thank you for your efforts to improve child care services by strengthening this Preprint. Please contact Council Coordinator Angie Garling at 510 208 9675 or at angie.garling@acgov.org if you have any questions about these comments.

Sincerely,

Carol Barton, Council Chair