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November 23, 2010

Child Care and Development Fund Plan

Submitted to: ACF Reports Clearance Officer, infocollection@acf.hhs.gov

Administration for Children and Families

Office of Administration/Office of Information Services

370 L'Enfant Promenade, SW, Washington, DC 20447

RE: Comments on CCDF State Plan pre-Print (ACF Form—118)

The draft CCDF State Plan Pre-Print published for public comment on September 24, 2010 presents a significant advance in the Administration's approach to promoting systemic and comprehensive planning within states. Basing questions on a framework that addresses the key elements of child care systems and requesting information related to quality improvement efforts is a welcome and useful approach to setting the stage to support states. This approach will help states improve coordination of services and build an infrastructure to promote quality and use resources efficiently. The key elements addressed in the plan also promote an evidence-based approach to service delivery, another indication of the thought that has gone into preparing the pre-print that is to be commended.

I would like to emphasize how important this systemic and comprehensive approach is for supporting states in their efforts to plan for the CCDF support for early care and education services as well as quality improvements. In my own state of North Carolina, I am facilitating a long-term planning process for changes and improvements in our QRIS. The pre-print document has already been used within the committee to help us define what elements of the system we should address and plan for key elements in the revisioned QRIS for our state. The elements included within the plan serve as a blue print for planning efforts and important decisions within states. Even if a state does not have a specific element in place, the process of answering questions about the element is useful. Again, the Office of Child Care is to be commended on this comprehensive approach.

I would like to provide some suggestions for your consideration as you make revisions to the draft document. First I will comment on the sections that address early learning guidelines, followed by comments on the section that addresses child assessments.

Section 3.2 (Component 2) Early Learning Guidelines.

I applaud the fact that early learning guidelines are included as a key element within the child care system. States have put a great deal of effort into developing the documents and the guidelines outline a shared understanding (across programs) of the child outcomes the state seeks to promote. They should be the foundation for policies and programs.

3.2.1: In addition to asking if a state has developed early learning guidelines, you might also ask for the date that they were published. Some states have revised their documents more than one time and it would be useful to have a publication date to make sure it is clear which version the state is currently using.

3.2.2: I commend the Office for requesting information on the domain and content areas addressed within the ELGs and for promoting comprehensive ELGs that address all domains of learning. The category titled “cognitive” seems to be a bit ambiguous. Within that area, states might list other academic content areas or might list aspects of cognitive development which should be addressed within ELGs. Perhaps you could consider either adding other academic content areas to the list (social studies, science) or clarifying what you are looking for within the “other cognitive” category.

3.2.4: I would recommend that you collect additional data on the training that is provided to support the use of ELGs and that you modify this question to accommodate other types of support that states may provide to programs, such as technical assistance. Consider collecting information on how much training is provided, whether it is required and, if so, for whom, and whether training specifically targeted to administrators is provided.

3.2.5: It is important for states to begin to think about how the ELGs are incorporated into various parts of the child care system. Therefore question 3.2.5 is an important question. I do wonder if some additional information about what you are looking for would be helpful. Will everyone completing the plan know what it means for ELGs to be incorporated into other parts of the child care system? Would an explanation or example be helpful for this question? I recognize that question 3.2.5 focuses specifically on the use of ELGs within the child care system. To truly promote a systematic approach, perhaps a separate question could be included to address how the ELGs are used in other systems that are related to the child care system (Early Intervention, Head Start, home visiting programs, etc.). The Child Care Administrator would not have purview over how the ELGs are used in other systems, but a question regarding how ELGs are used in other settings could promote cross-program awareness.

3.2.6: While it is important to guide states toward thinking about alignment of their ELGs with other documents, current question does not fully address alignment issues. First, rather than asking whether alignment exists, it would be better to ask if a formal alignment analysis or study has been completed and then to ask states to describe the results of the analyses. Unfortunately, many in our field think that simply looking at two documents is sufficient to determine alignment between standards. We need to promote a more systematic and thoughtful approach to looking at alignment. Simply asking if the ELGs are aligned with other standards does not promote a more sophisticated understanding of alignment issues. In addition to modifying the question, the potential responses should also be revised. It is possible that a state may have undertaken an

alignment study for their preschool ELGs and perhaps not for their infant-toddler ELGs, and vice versa. It is important to communicate that alignment is important for all age levels. You might ask about whether alignment analyses have been conducted for both infant-toddler and preschool ELGs (separately), and ask whether there has been an effort to study alignment between the infant-toddler and preschool ELGs.

3.2.7: I commend the Office for asking about what data are collected regarding the dissemination of ELGs. I am, however, concerned that the current draft does not fully address the “heart” of implementation of ELGs. The main form of implementation we want to promote is caregivers/teachers using them in planning for their work with children. In asking about the data that are collected related to ELGs, the plan seems to imply an assumption that providers are using the ELGs within their work, but does not directly address it. Perhaps a question should be asked as to whether there are any policies that require caregivers/providers to use the ELGs and, if so, who is required and what are the requirements. The data that are collected to validate that the ELGs are being used are secondary to policies that require providers to use ELGs. The plan should ask about such policies/requirements.

3.3.1: Element 1—Program Standards

The list of areas that are addressed in the quality standards is relatively comprehensive but could also include ELGs as another area that could/should be addressed.

3.3.4: Element 4—Quality Assurance and Monitoring

I think perhaps the positioning of the item 3.3.4c is problematic. I conceptualize child assessments as an integral part of an early care and education system and think that all of the types of assessment addressed in this item are important. However, I think perhaps requirements that programs begin to use assessments and the training and support that are provided related to assessments are more important than the type of data that are collected from child assessments at this point in time. Furthermore, I am not sure that Child Care Administrators could answer the questions on how child assessment tools are being used. They often do not have a requirement that addresses child assessments within child care programs and so the most common responses may be the first option (no systematic child assessment is currently being used). I would recommend that you re-conceptualize what you are “after” with this question and focus more on asking questions about what types of assessments are required by whom and what type of supports are provided for the different types of assessments. My idea may not fit exactly with the framework that has been used to determine the categories and sub-categories within the plan, but I would move questions about child assessments to section 3.2 and make them an additional topic (similar to ELGs), or move this topic to 3.3.1 and ask about child assessments as part of the information collected regarding the program standards. Within that context, you could also ask about what data are collected on programs’ use of assessments and/or the child assessment results (the same way you have for the ELG section).

If you elect to keep the question 3.4.4c where it is and to keep the current focus, I suggest that you consider revising the item to also address the use of assessments for instructional planning purposes. Perhaps the second bullet is intended to address instructional assessments (“child assessment tools are used to assess the progress of children using measures aligned with the early learning standards or other child standards”), but it is not

clear that this is the case because assessment results could be used to “assess the progress of children” for purposes other than instructional planning. This bullet could be revised to more clearly address instructional assessment.

Finally, I generally noticed a lack of attention to curriculum across the document. It is addressed within a few lists (such as the list of elements that the program standards address), but really receives relatively little attention. If ELGs and assessments are a focus within the plan, curriculum should also be addressed. These three elements form the core support for intentional, high quality teaching. Most of our child care systems and providers are in the early stages of understanding what these elements are and how to support programs’ use of ELGs, curricula and assessments. If the plan is going to address two of the elements, it should address the third—curricula—with equal emphasis.

Please do not hesitate to contact me with questions or clarifications on my comments. I can be reached at 336-256-0132 or mcscottl@uncg.edu.

Sincerely,

A handwritten signature in cursive script that reads "Catherine Scott-Little".

Catherine Scott-Little, Ph.D.
Associate Professor