



STATE OF IOWA

CHESTER J. CULVER, GOVERNOR
PATTY JUDGE, LT. GOVERNOR

DEPARTMENT OF HUMAN SERVICES
CHARLES J. KROGMEIER, DIRECTOR

November 22, 2010

Administration for Children and Families
Office of Administration - Office of Information Services
Attn: ACF Reports Clearance Officer
370 L'Enfant Promenade, S.W.
Washington, DC 20447. .

Re: Comment to the Proposed FFY 2012 - 2013 CCDF Plan Preprint
Title: Child Care and Development Fund Plan for States/Territories for FFY 2012-2013 (ACF-118).
OMB No: 0970-0114.

As stated in the Federal Register,

"The Child Care and Development Fund (CCDF) Plan (the Plan) for States and Territories is required from each CCDF Lead agency in accordance with Section 658E of the Child Care and Development Block Grant Act of 1990, as amended (Pub. L. 101-508, Pub. L. 104-193, and 42 U.S.C. 9858). The implementing regulations for the statutorily required Plan are set forth at 45 CFR 98.10 through 98.18. The Plan, submitted on the ACF-118, is required biennially, and remains in effect for two years. The Plan provides ACF and the public with a description of, and assurance about, the States or the Territories child care program. The ACF-118 is currently approved through April 30, 2012, making it available to States and Territories needing to submit Plan Amendments through the end of the FY 2011 Plan Period. However, on July 1, 2011, States and Territories will be required to submit their FY 2012- 2013 Plans for approval by September 30, 2011. Consistent with the statute and regulations, ACF requests extension of the ACF-118 with minor corrections and modifications. The Tribal Plan (ACF-118a) is not affected by this notice."

We are in agreement that the State Plan should provide a description of, and an assurance that the programs administered by the Lead agency are in compliance with the federal requirements. However, we have reservations regarding the statement that only "minor corrections and modifications" were made.

The plan goes well beyond the scope of 'providing a description of' and requires states to describe elements outside the requirements of the federal law and regulations, to report data that may be kept by entities other than the Lead Agency, and to develop performance measures beyond those developed by ACF (and derived from the required federal financial and case reports) for congressional accountability and reporting. While the latter is not in and of itself lacking merit, it is being requested of states without additional funding to support the data tracking, compiling, and analysis necessary for the activity to be meaningful.

With the filters of supporting states in developing programs within a flexible block grant, recognizing the lack of additional resources to support improvements that both ACF and the states may desire, and in meeting the intent of the requirements of the federal law, the following are Iowa's comments to the proposed preprint:

1. Public Comment from the National Association of State Child Care Administrators (NASCCA) under the American Public Human Services Association.

Iowa participated in the development of, and mirrors and supports, the scope of comments submitted by NASCCA.

2. In addition, the following areas raised questions or concerns:

General Comments

Regulatory descriptors – used throughout the document – because not all states regulatory structures and definitions are consistent, it is important to allow states to define who they regulate and what the terms mean. For example, in Iowa, we would be unable to check any box when the listing only uses the term “licensed” to describe child care homes.

Data tracking – many items in the plan assume data elements are available that simply are not tracked or kept in an electronic data system. While the plan provides a host of “not available” options, at what juncture is this going to become an expectation of states, and if so, will *additional* CCDF targeted funding for management information systems be forthcoming?

Part 1 - Administration

No further comments beyond those submitted by NASCCA.

Part 2 - CCDF Subsidy Program Administration

No further comments beyond those submitted by NASCCA.

Part 3 - Health and Safety and Quality Improvement Activities

Section 3.3.7 – Data & Performance Measures on Program Quality

While the data for this section might be collected in specific case files for programs participating in the state's QRS, it is not all collected in any type of electronic system – therefore, to gather and report would require a significant, and unfunded, effort.

Section 3.4.3 – Workforce Element 3 – Higher Education Capacity

As a Lead Agency, it is unclear to us why this is a reporting expectation?

As with other questions within Section 3.4 Pathways to Excellence for the Workforce, many of these are not under the purview or control of the Lead Agency, CCDF funding may or may not be contributing, and some questions need better definitions or presuppose that structures are in place (i.e., at 3.4.3(c) .. “between the training and technical assistance system...” – this is not a defined or consistent structure in states.

Furthermore, where states have mandatory training registry systems, some of the data may be more readily available to them than to other states. However, and again, funding for management information systems is not included as a CCDF targeted fund.

Appendix 1 – Quality Performance Report

Section 3.2.1 – on-site technical assistance

No system tracks the data requested; – therefore, to gather and report would require a significant, and unfunded, effort.

Section 3.2.2b – ongoing or periodic stipend support

No system tracks the data requested; therefore, to gather and report would require a significant, and unfunded, effort.

Section 5.1 – Percentage of quality funds by six activity areas

The Lead Agency would have a difficult time reporting this data in a meaningful way, as many activities overlap both funding streams and contractors. For example, while the Lead Agency funds a state Child Care Resource and Referral System, of which one of the many services purchased is consumer education for parents, there is not a specific line item within a budget targeted to this service – and doing so would, to some degree, be counter-productive to performance-based contracting efforts.

Another example of difficulty would fall under the categories of health and safety and technical assistance – as a state who funds home consultants and nurse consultants, both of whom certainly support the regulation and health and safety of providers, which category would that be reported under?

The Lead Agency would not be in favor of requiring additional data tracking to report this information without additional funding and agreed-to national definitions to support this requirement. Without agreement across the states regarding what activities fall specifically under which category, “rolling up” this data into a national picture will not be value-added nor reflective of what’s occurring in states.

We thank you for the opportunity to comment on the Proposed Preprint. Please contact me at janders4@dhs.state.ia.us or (515) 281-6177 if you have any questions.

Sincerely,

A handwritten signature in black ink, appearing to read "Jeffrey P. Anderson", with a long horizontal line extending to the right.

Jeffrey P. Anderson
Chief, Bureau of Child Care
State Child Care Administrator