

November 19th, 2010

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

Re: Comments on the Proposed FY2012 – 2013 CCDF Plan Preprint

To Whom It May Concern:

Thank you for the opportunity to comment on the proposed Fiscal Year 2012-2013 Child Care and Development Fund (CCDF) Preprint. Preschool California is an advocacy and policy organization in California supporting increased access to high-quality early education including preschool and infant and toddler programs. Research consistently demonstrates the importance of investing in high-quality early education programs, particularly for low-income children. Given this, we applaud the Office of Child Care's effort to raise the quality of programs funded through CCDF and are eager to work at the state level in California to ensure that this preprint helps to incentivize higher quality programs and stronger accountability of programs and systems for our youngest learners. The reorganization of the preprint is very clear and helpful to states in planning their use of the CCDF funds. While we are pleased with the overall preprint, our comments will focus primarily on section 3, "Health and Safety and Quality Improvement Activities," as this section's changes represent the bulk of the new direction of the preprint. We are pleased to see the preprint emphasize accountability and child outcomes of the quality dollars.

The preprint's focus on the four quality components—licensing and health and safety standards, early learning guidelines, quality rating and improvement programs and systems, and professional development systems and workforce initiatives—demonstrates an exciting new focus of the CCDF quality funds on systems integration.

Section 3.1, "Activities to Ensure the Health and Safety of Children in Child Care," This section requires the lead CCDF agency to report basic licensing and health and safety measures of CCDF programs back to HHS, and to develop a plan for improving the quality of the care of these programs. This requirement is particularly important for California as our lead agency, the California Department of Education (CDE), is not responsible for licensing child care facilities. This section incentivizes the CDE to work closely with the Department of Social Services and their Community Care Licensing Division to set benchmarks for licensed and license-exempt child development programs, and to collect uniform data towards meeting improvement goals. Section 3.1.2, which requires the lead agency to document current licensing enforcement and to come up with a goal for improving that enforcement, is particularly critical for California. Given our budget deficits, California has had to cut back licensing enforcement to one unannounced visit every five years. Most other states conduct these unannounced visits multiple times per

year. We appreciate the emphasis on creating a plan to improve this situation in California. Finally, we very much support the focus on data in section 3.2.7, particularly data that demonstrates child outcomes. Too often, health and safety data are not linked to child outcomes, even though we know how critical these basic provisions are for a child’s learning environment and brain development. In addition, given the large portion of our children that utilize license-exempt care, it is imperative that we know more about the care that these children are in, do more to help those providers meet basic health and safety standards and promote research-based early learning standards.

Section 3.2, “Establishing Early Learning Guidelines,”: This section requires the lead agency to develop, implement and track standards that are developmentally appropriate for child development programs funded through CCDF. California has developed “Preschool Foundations” for curriculum standards in early learning programs. The Foundations cover four areas, including social and emotional development, language and literacy, English language development and mathematics. The California Department of Education is scheduled to release additional foundations in the several years that include science, art and other areas of curriculum. In addition to the breadth of areas that the Foundations cover, they are also developmentally appropriate, differing by age. California is the only state in the country to have in place Infant and Toddler early learning standards. We are very proud of these standards and are eager to build upon them in the coming years to continue leading the nation in this area. Section 3.2.6 urges that early learning standards be aligned with both Head Start and K-12 standards and curriculum. This component is critical. One of the main charges of each state’s Early Learning Advisory Council (ELAC) is to coordinate the various funding streams, curriculum and professional standards of child development programs to provide seamless, integrated and aligned care for our youngest learners. As California’s ELAC begins its work, it is critical that the council has the incentive from the CCDF requirements to push it to align and coordinate curriculum and standards between programs.

Section 3.3, “Creating Pathways to Excellence for Child Care Programs through Program Quality Improvement Activities including Quality Rating and Improvement systems,”: This section requires the lead agency to develop and integrate Quality Rating and Improvement Systems (QRIS) with CCDF programs and quality improvement activities. The focus on QRIS in the CCDF plan raises its importance and timeliness. The five elements—program standards, non-monetary supports, financial incentives, quality assurance monitoring, and outreach and consumer education—align well with California’s current work in developing a QRIS. In particular, the link to licensing, focus on special needs children and dual language learners and the focus placed on outreach and public education mirror the QRIS discussions in the Early Learning Quality Improvement Systems Advisory Committee (ELQISAC) in California. As our ELAC continues the work of the ELQISAC in implementing their QRIS design, the data requirements for program quality established by section 3.3.7 will be extremely helpful.

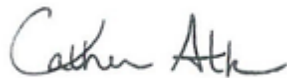
Section 3.4, “Pathways to Excellence for the Workforce – Professional Development Systems and Workforce Initiatives,”: This section focuses quality improvement activities toward much needed workforce development. This piece is critical, especially in California where our mixed delivery system and disparate higher education opportunities leave us with an often uncoordinated professional development system for early learning. The ELAC will work

over the next several years to develop a statewide workforce registry, and coupled with the implementation of our QRIS, will begin to streamline the workforce development programs and offerings in the state. As the ELAC and CDE begin this work, it will be helpful for them to follow the guidelines of cataloguing the higher education capacity, the training and TA capacity, as well as the overall compensation, benefits and working conditions of our early learning workforce. The data requirements will be very helpful in beginning to plan for the necessary programs to increase the capacity and bandwidth of our professional development system.

California is working hard to implement a comprehensive, aligned, quality early learning system. The new requirements within the CCDF preprint will incentivize California to coordinate its quality programs and develop goals for improving these programs. It will also incentivize California to begin collecting the data needed to evaluate these programs based on child outcomes and ultimately to benchmark that progress to move us toward the high-quality early learning systems that our youngest learners deserve.

We thank you for your leadership on behalf of young learners in both subsidized and non-subsidized programs and look forward to using the CCDF Preprint as a guideline for building early learning systems in California that lead the nation.

Sincerely,

A handwritten signature in cursive script that reads "Catherine Atkin".

Catherine Atkin
President, Preschool California