

Illinois Department of Human Services
BUREAU OF CHILD CARE AND DEVELOPMENT

**COMMENTS ON
Child Care and Development Fund State Plan Pre-Print, dated 9.24.2010**

General Comments

- Sections have been combined so that there is less repetition among sections. Instead of six sections, there are now three: Administration, CCDF Subsidy Program Administration, and Health and Safety and Quality Improvement Activities. I appreciate the attempt to simplify and streamline the Plan Pre-Print.
- There are lots of tables. I believe that this will reduce the amount of narrative that is required, however, we will need space to explain current status, plans and variances in definitions, such as provider type (3.1.1) and eligibility determination time frames (2.1.9). The electronic form will limit the space needed for these explanations or descriptions.
- Would like to see definitions of the following terms on the pre-print or in the Guidance:
 - 'issues' and 'administers:' They are used often and could mean the Lead Agency or one of our contractors. (See Table 1.3.2 on pg 6.)
 - Subrecipients: This term is used a couple of times along with “contractors” and “grantees.” We need to know how the terms differ.
 - General purpose local government: Please give examples
- Please give clear instructions about how to include, or exclude, ARRA-funded activities in the Plan, including Section 1.2.1, Estimated Funding on page 4.
- Throughout the Pre-print, there seems to be a presumption that all States have everything in place. Previous Pre-prints have given the States the opportunity to say where they are: Planning, Developing, Developed, Implementing, Revising, and Other. States are likely to always be in different places when it comes to things like Early Learning Guidelines, Professional Development Plans, Quality Rating Systems, etc. It is helpful to be able to say, for example, IL has developed an Emergency Preparedness Plan and it will be implemented in the next biennium. States need unlimited space to explain current status of and plans for the different types of systems and plans addressed in the Pre-Print.
- Please indicate the required items clearly. I am concerned about public reactions if we aren't doing a non-required item as it is presented in the pre-print. For example on page 14, Section 2.1.2: How can parents apply for CCDF services? I am concerned about negative reactions if all items aren't checked, even though all types of application routes aren't required.

Part 1 Administration

- Sec. 1.4.2: Will the term “sub-recipients” be used to mean all “contractors” now? The question goes on to ask about monitoring “contractors” or “grantees.” It would be very helpful to have a definition of any new terminology.

Part 2 CCDF Subsidy Program Administration

- Sec. 2.1.3: The use of the term “assessment” is misleading.
- Sec. 2.2.5.d-e: Could some appropriate sources be listed in the Guidance as to when to obtain the most current SMI and FPL information?
- Sec. 2.6.5: Describe payment rate ceilings...: This is one of the tables that needs unlimited space for explanations. Rates are not set consistently at the same percentile across the board.

Part 3 Health and Safety and Quality Improvement Activities

- Sec. 3.1.1b – Compliance with applicable...regulatory requirements on licensing:
 - I’m confused about the reference to the National Resource Center for Health and Safety in Child Care and Early Education. IL’s licensing standards are posted on this website. Do I only need to confirm they are the most recent, and if not, submit the most recent?
 - The regulatory definitions of the child care provider types don’t always match those used by CCDF and those included in the pre-print. For example, “Group Homes” is defined as being two or more individuals... In Illinois, a Group Home setting isn’t required to have the second individual until the number of children present reaches a certain point, depending on the ages being served. The appropriate number of adults present will vary with each Group Home license. Suggest that states provide definitions.
- Sec. 3.1.3.a-c – Compliance with...requirements on Health and Safety:
 - (3.1.3.a-b) Want to confirm that when the Lead Agency requires providers to comply with the Licensing Agencies requirements on health and safety, the Lead Agency is in fact requiring these items?
 - (3.1.3.c) This is another place where room is needed for explaining variances in provider types.
- Sec. 3.3 – “Creating Pathways to Excellence for Child Care Programs through Program Quality Improvement Activities...” Including “QRIS” systems in the title of this section indicates that States are expected to have them in place. This is much more prescriptive than in previous Pre-prints. While the section heading contains “Quality Improvement Activities”, the subsequent sections apply to a QRIS only.
- Secs. 3.3 and 3.4 – General Comment about these Quality Sections: The Quality Section of previous Pre-prints has been much more open-ended than this one is. States are too different to be able to respond to these questions adequately and appropriately.

11/18/10

We suggest that OCC acknowledge the good work being done by the States to improve quality, explain that this information will be used to develop a baseline, provide targeted technical assistance, and assure States that there will be no penalties for not have the types of programs cited in place.

Appendix 1 – Quality Performance Report

- This entire section causes some stress because it is new. But more importantly, it will require tracking of data that may not exist in some states. These states may not be financially able to develop and implement tracking systems by October 2011, or even October 2012 for that matter.
- States understand the need to be able to explain how the funds are being spent and what the outcomes have been, but many states will only be able to report in a narrative format.
- States will need technical assistance as they develop systems for tracking data on quality activities.

Process Questions

- As this will be an electronic document, will we be able to keep the “original” secure as the form is distributed to staff for completion?