

Following are my comments on the proposed CCDF pre-print:

Before I comment on the specific questions posed, I want to commend the Office of Child Care on this pre-print. The pre-print encourages states to move their efforts to the next level of early childhood system development. Responding to this pre-print will encourage discussions in my state that need to occur if we are going to build a high quality comprehensive system. Thank you.

- (a) Whether the proposed collection of information is necessary for the proper performance of the functions of the agency, including whether the information shall have practical utility

While the pre-print pushes for data that states might not readily have, I think it is a push in the right direction. I would encourage you to ask about how much of the available care is exempt from licensure in the state, territory or tribal nation, and what percentage of children supported by CCDF receive their child care in an unlicensed program. It would also be helpful to know why some programs are exempt – by law or rule or policy.

In 3.1.4.b) and c) may need some clarifications to get good answers to both questions – are the performance measures on the performance of the child care programs that are licensed and the evaluation the evaluation of the effectiveness of the state's licensing system? Not sure if this is these are the questions being asked or not.

- (b) The accuracy of the agency's estimate of the burden of the proposed collection of information – no comment
- (c) The quality, utility and clarity of the information to be collected – see a) above
- (d) Ways to minimize the burden of the collection of information on respondents, including through the use of automated collection techniques or other forms of information technology

Some of the data requested is available via the Licensing Study; if it is available there it may not be necessary to ask for it again.

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