Pennsylvania is pleased with the intent of the plan to collect key elements on state's early childhood education programs. We believe the new format will lessen the burden on states while allowing data to be extracted and compared nationally. The Office of Child Care should understand that states will not have data available during the first year of the revised plan and should consider allowing states to indicate the timeline when the data will be available. This will assist states in prioritizing and moving data collection efforts forward. Pennsylvania endorses the electronic submission/completion of the CCDF State Plan.

We have several comments regarding the quality, utility and clarity of information to be collected in the following sections.

3.1.1. Compliance with Applicable State/Territory and Local Regulatory Requirements on Licensing

Group Homes. Group home child care provider is defined as two or more individuals who provide child care services for fewer than 24 hours per day per child, in a private residence other than the child's residence, unless care in excess of 24 hours is due to the nature of the parent(s)' work. (§98.2).

This is a limiting definition as Pennsylvania has the category of group child care home that applies to any location and is not limited to a private residence. Perhaps a question needs to be developed regarding this definition to encompass differences among states such as: for your state, does this apply to private residence only or any location?

3.1.2 Enforcement of Licensing Requirements

Each Lead Agency is required to provide a detailed description of how its licensing requirements are effectively enforced. (658E(c)(2)(E), §98.40(a)(2))
Describe how your State/Territory's licensing requirements are effectively enforced. At a minimum, this description should include information whether and how the State/Territory uses visits (announced and unannounced) and background checks. The Lead Agency should also describe any other enforcement policies and practices.

Consider amending this section by including these other elements:
1. *Are providers required to submit plans to correct violations cited during inspections?*
2. *Do licensing staff approve the plans of correction submitted by providers?*
3. *Do licensing staff verify correction of violations cited during inspections?*

4. Do licensing staff provide technical assistance regarding how to comply with a regulation?

5. Does your state have procedures in place to issue a negative sanction to a noncompliant facility?

6. What types of negative sanctions does your state issue to licensed facilities:

Provisional or probationary license
License revocation or nonrenewal
Injunctions through court
Emergency or immediate closure not through court action
Fines for regulatory violations

7. How does your state respond to illegally operating child care facilities?
Cease and desist action
Injunction
Emergency or immediate closure not through court action
Fines

8. Does your state require providers to attend or participate in training relating to opening a child care facility prior to issuing a license?

Consider reducing the scope of the clearance questions in order to achieve a more balanced and comprehensive approach to the information about effective licensing, using the elements noted above.

3.1.3 Compliance with Applicable State/Territory and Local Regulatory Requirements on Health and Safety

a) **Describe** the health and safety requirements for prevention and control of infectious disease in effect for child care providers of services for which assistance is provided under CCDF. (658E(c)(2)(F)(i), §98.41(a)(1))

"Tuberculosis check for providers" of persons with previously negative skin test results are not required on an ongoing basis unless required by a local or state health department. This should be clarified to require a report of the tb test at the time of initial employment.

b) **Describe** the health and safety requirements for building and physical premises safety, including policies and practices to protect from environmental hazards, in effect for child care providers of services for which assistance is provided under CCDF. (658E(c)(2)(F)(ii), §98.41(a)(2))

c) **Describe** the health and safety requirements for health and safety training in effect for child care providers of services for which assistance is provided under CCDF. (658E(c)(2)(F)(iii), §98.41(a)(3))

3.2.3 To whom are the early learning guidelines disseminated?
- o Parents in the child care subsidy system
- o A broad group of parents using child care
- o All parents, in a format that can guide parents as teachers
- o Other. List

3.3.1 Element 1 – Program Standards
Definition – For purposes of this section, program standards refers to the expectations for quality, or quality indicators, which identify different levels of and pathways to improved quality. Licensing and health and safety requirements are also standards but should not be included here since they were addressed in sections 3.1 and 3.2.

a) Do your State/Territory's quality improvement standards include quality indicators that cover the following areas? Check all that apply.
- o Ratios
- o Health and safety
- o Curriculum and instruction
- o Physical environment
- o Staff qualifications and professional development
- o Family partnerships and family strengthening
- o Administration and management

o Child assessment for the purposes of individualizing instruction and/or targeting program improvement
o Developmental screenings
o Other. Describe

Consider adding an option for states/territories where the QRIS does not include indicators listed above because foundational certification adequately provides for the concern. Please allow for this distinction to be made that certain health and safety best practices may be included in certification regulations which is a required component of program participation. For example, in Pennsylvania, ratios are not addressed in our QRIS because they are captured within our certification regulations. Pennsylvania recognizes ratios as a precursor to program participation, and should not be deemed negligent for not including them in program standards. Consider using a table format that allows for this distinction to be made between QRIS and certification regulations.

d) Do your State/Territory's quality improvement standards align with or have reciprocity with any of the following standards? Check all that apply.
o Early learning guidelines
   o ELG's for infants and toddlers
   o ELG's for preschool children
   o ELG's for school-age children
o Core competencies
o K-12 standards
o State/Territory pre-kindergarten standards
o Head Start performance standards
o Early childhood curricula
o Other. Describe

Consider adding an option for private national accreditations.

3.3.2 Element 2 – Non-Monetary Supports
Definition – For purposes of this section, non-monetary supports refers to supports for programs in meeting child care quality improvement standards. For example, non-monetary supports could include technical assistance and consultation services for programs.
a) Identify which types and methods you use to support to child care programs in the following chart. Check all that apply.

Consider adding an option entitled English Language Learners.

3.3.3 Element 3 – Financial Incentives
Definition – For purposes of this section, financial incentives refers to the types of monetary supports offered to programs in meeting and sustaining licensing and QRIS or other child care quality improvement standards for programs.

    a) Identify which types of financial incentives are offered and to which providers in the following chart. Check all that apply.

Consider adding an option entitled Tuition Vouchers or Reimbursement Programs for Teacher Quality Enhancement.

3.3.4 – Element 4 - Quality Assurance and Monitoring
c) Describe how your State/Territory uses child assessment.

- o No systematic child assessment is currently being used.
- o Child assessment tools are used to assess the progress of children using measures aligned with the early learning standards or other child standards.
- o Child assessment used to measure and improve the impact of teaching practices or curriculum implementation.
- o Child assessment used to identify children eligible for special services, modify curriculum to meet the needs of individual children, and ease the transition for children and families from home to school.
- o Child assessment used to track longitudinal child outcome data to inform policy and practice.
- o Child assessment activities are linked with program accountability initiatives (e.g. QRIS, Head Start).
- o Other. Describe

Consider additional option: Child assessment used to share information with parents and solicit partnership in providing learning opportunities.

3.4.4 Workforce Element 4 -Training & Technical Assistance Capacity
Definition – For purposes of this section, training and technical assistance capacity refers to capability of the training and technical assistance system to meet the needs of a linguistically and culturally diverse workforce and to ensure that the content is addressing the needs of culturally and linguistically diverse children.

Consider adding Question E:
Does the State/Territory have Mentors/Coaches available to provide technical assistance to programs in the following areas? (check all that apply)

- *Health and Safety*
- *Early Childhood Mental Health*
- *Business Practices*
- *Classroom Environment*
- *Specific to Infants/Toddlers*
- *Specific to School Age*
- *Other. Describe*

Appendix 1 – Quality Performance Report

Some items are not tracked in a manner that answers the question that is posed. Therefore, there will need to be a category for Data Not Available for all questions.

1.2.6 How many injuries or fatalities occurred in child care as of the end of the last fiscal year?

More clarification is needed as children get bumps and scrapes on a regular basis. Pennsylvania does not require reporting of every injury and does not track that type of information.