

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.”

Considering that 37 new Governors were elected this month, the state would respectfully ask that the state plan pre-print not be finalized for the next several months, allowing new administrations to have ample time to review the plan and its potential implications.

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, it appears that more changes were made other than the minor corrections and modifications specified in the notice. The proposed plan goes beyond any previous plans in its scope and creates data maintenance and reporting requirements for states that may be costly and manual and, in some cases, impossible based on data states are currently collecting. Many states are not in a financial position to underwrite the associated costs for this reporting.

In addition, the proposed plan holds the lead agency responsible for certain activities and data administered outside the agency and outside the CCDF funding source. The plan places great emphasis on quality rating systems, while some states have been unable or unwilling to implement a QRIS, and other states have met with mixed results after implementation. Additionally, there is currently a lack of reliable research to inform states on which components most impact outcomes for children.

The proposed plan asks states to set goals based on licensing standards. Because licensing regulations are subject to approval by the Governor and Legislature, the Lead Agency can propose regulations, but can not guarantee their passage. To hold states accountable for goals outside the Lead Agency's control is problematic, particularly given the economic reality that child care providers, like all small businesses, are experiencing.

Finally, we applaud your efforts to redesign the pre-print and believe our state makes excellent use of the CCDF block grant and the quality dollars entrusted to us by the federal government. We stand ready to provide you with as much data as possible to ensure that we are meeting the goals of the federal law. As always, I thank you for being willing to listen to our thoughts and for allowing us a chance to comment on the proposed CCDF plan pre-print.

Sincerely,

Leigh W. Bolick
Director, Child Care Services
SC State Child Care Administrator