

## Compiled Comments for the ACF-118 (State Plan)

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General comment: All 'Check All That Apply' questions should allow for "Yes" and "No" responses for each response. Otherwise, it will be difficult to determine which were 'no' responses versus one inadvertently left unanswered.

p.4 (1.2.1) The list of funds does not appear to be complete. Add the following: Title XX (Social Services Block Grant, SSBG), State-only child care funds (in excess of State funds used to meet CCDF Match and MOE requirements), Title IV-B or Title IV-E funds, SNAP funds (formerly Food Stamps), and Other: Describe.

p.6 (1.3.2). The list of agencies may not be mutually exclusive. Believe that CCR&R's could be for-profit private vendors or community-based organizations. If so, there may be confusion regarding which category(ies) to check.

p. 7 (1.4.3). The activities do not appear to be mutually exclusive. Definitions may help to distinguish how 'quality control reviews' are different from 'review of attendance or billing records' and 'audit provider records'.

p. 7 (1.4.3). What does "conducts supervisory staff conduct reviews" mean?

p. 9 ( 1.5.1). Indian Tribes/Tribal Organizations: If this item is not checked, OCC will not be able to distinguish between a Lead Agency that did not consult with Tribes and a Lead Agency for whom there are no Tribes within the State boundaries. Suggestion: Change entire table to 'Yes' and 'No' options and for this response, add 'Not Applicable'.

p. 10 (1.6). In order to avoid using the defined word in its own definition, we propose the following alternative language: Coordination requires that child care and early childhood development programs work together to increase access, streamline parental requirements, and enhance one another's services. Coordination includes efforts to work across multiple entities, both public and private (such as in connection with a State Early Childhood Comprehensive System (SECCS) grant or the State Advisory Council funded under the Head Start Act of 2007) (658D(b)(1)(D), §§98.12(a), 98.14(a)(1)).

p. 13 -(1.7.1) Recommend using different terms for the response categories: Planning, Developing, Developed, Other.

p.14 (2.1.1). This is a mixed list of WHO and HOW. Consider re-wording the question to read: “By whom, and how are parents informed...”.

p. 15 (2.1.5). The listed options mix items that may be ‘barriers to access’ vs. ‘barriers to eligibility’. It is not clear what OCC is seeking here, and there may be a need for two separate questions.

p. 15 (2.1.5). If OCC is looking for ways grantees reduce barriers to access, consider using the following alternative options: Consider revising list according to the following:

- Extend office hours, accept applications at multiple office locations, provide a toll-free number for clients
- Simplify application and/or re-determination process:
  - Simplify the application form or utilize a single application for multiple programs
  - Coordinate eligibility policies across programs
  - Streamline verification procedures, by linking to other program data systems
- Include temporary periods of unemployment in eligibility criteria (job search, seasonal unemployment)
- Other. Describe \_\_\_\_\_

p.16 (2.1.7). Consider shortening run-on sentence to read: “How does the Lead Agency reach out and provide services to eligible families with limited English proficiency? “ Also all response options, with the exception of one, indicate activities the Lead agency may conduct. Consider changing “Family can apply at local community-based locations” to “Lead Agency accepts applications at local community-based locations.”

p. 16-(2.1.8). Clearly define/describe what you are looking for. Unsure if you are asking the Lead Agency to describe the documents that are required for each and then how the documents are verified as legitimate or are you seeking some other information. Perhaps an example would help.

p. 16 (2.1.8). Under “Work, Job Training or Educational Program”, add an additional category, “school hours”.

p. 18/19 (2.2.1 /2.2.3). Both items ask for the definition of “residing with”. I believe the language inadvertently was left in 2.2.3 (a) description: a) How does the Lead Agency define “working” and “residing with” for the purposes of eligibility?

p. 19 - 20 (2.2.5 a & b). Consider the possibility of using the same list twice and asking two separate questions. What income is counted when determining eligibility? What income is deducted when determining eligibility? Also, “Child Support Received” is in the list for (b) twice. Perhaps one should be “Child Support Paid”.

p. 19 - 20 (2.2.5 d, column d). Instruction is incorrect. It should be “% of SMI [Divide (c) by (a), multiply by 100]”. Also, re-work table ‘d’ to include ‘e’ as a part of the table.

p. 22- (2.3.1/2.3.4). Both sections ask whether sliding fee/family fee varies by geographic region.

p. 22- (2.3.4). These choices are not mutually exclusive (i.e. the “fee as dollar amount” could be a ‘fee per family’). Suggest they be broken out into how the fee itself is calculated, and then to whom it is applied (i.e. which children in which order). Also, should this allow for the option to ‘check all that apply’?

p.26 (2.5.2 c) – Add “authorized hours” as a response category.

p.29(2.6.8) – Question is missing.

p. 31 (3.1.1) –The definition provided might be confusing. The first part of the definition says to include ‘registration requirements established under State, local or tribal law’ and the next sentence says to exclude registration requirements.

p.49 (3.3.6b) – There is a typo in the question: “3.3.1a” should be “3.3.6a”.

p.54 (3.4.3c) – Typo – Does the State/Territory have articulation agreements ~~are~~ in place across...

p. 51 (3.4.1.b and following references) –Is it appropriate to include other non-professional categories such as cook, van driver in the “support staff” description.

p. 67 (4.2) – So far in this section, OCC addresses only teachers/professional staff, but earlier support staff also were included. If this element is intended to address more than teaching/professional staff, a selection choice for “support staff” also may be appropriate here.

p. 69 (5.1.) “How were CCDF Quality Funds Spent?” -- OCC needs to be prepared to give clear guidance if they want this table to be consistently reported and useful for analysis. Suggest you ask the total dollar amount of quality dollars on which the percentages are based.

### “Check Only One” / “Check All That Apply” Questions

The following are questions that we believe should be marked as “Check All that Apply”, but were not defined as such in the draft Plan Pre-Print.

1. Question 1.2.2 (p. 4) – Is this a “Check All that Apply”?
2. Question 1.5.1 (p. 9) – Is this a “Check All that Apply”?
3. Question 2.1.11c (p. 17) – Is this a “Check All That Apply”?
4. Question 2.2.6b (p. 22) – Are the NO options “Check All that Apply”?
5. Question 2.3.3 (p. 22) – Is this a “Check Only One”?
6. Question 2.3.4 (p. 22) – Is this a “Check All that Apply”?
7. Question 2.4.1 (p. 23) – Are these check box groupings “Check Only One”?
8. Question 2.5.2b (p. 25) – Is this a “Check All that Apply”?
9. Question 2.5.2c (p. 26) – Is this a “Check All that Apply”?
10. Question 2.5.3a (p. 26) – Is this a “Check All that Apply”?
11. Question 2.5.4 (p. 27) – Is this a “Check All that Apply”?
12. Question 2.5.5 (p. 27) – Is the first two check boxes Check One while the 2<sup>nd</sup> set of check boxes “Check All”?
13. Question 2.6.5 (p. 28) – Is the middle column a “Check All that Apply”?
14. Question 2.6.6 (p. 29) – Is this a “Check All that Apply”?
15. Question 2.6.7 (p. 29) – Is this a “Check All that Apply”?
16. Question 3.1.1b (p. 33) – Are the check box grouping under the “Some in-home child care providers ...” check box of the “In-Home provider” check box a “Check All that Apply”?
17. Question 3.1.3d (p. 41) – Is this a “Check Only One”?

18. Question 3.1.3d (p. 41) – Are the check box grouping under the 3<sup>rd</sup> check box a “Check All That Apply”?
19. Question 3.1.4a (p. 41) – Is this a “Check All that Apply”?
20. Question 3.2.1 (p. 42) – Is this a “Check All that Apply”?
21. Question 3.2.3 (p. 42) – Is this a “Check All that Apply”?
22. Question 3.2.4 (p. 43) – Is this a “Check All that Apply”?
23. Question 3.2.5 (p. 43) – Is this a “Check All that Apply”?
24. Question 3.2.6 (p. 43) – Is this a “Check All that Apply”?
25. Question 3.2.7a (p. 43) – Is this a “Check All that Apply”?
26. Question 3.3.1b (p. 44) – Is this a “Check All that Apply”?
27. Question 3.3.1c (p. 45) – Is this a “Check Only One”?
28. Question 3.3.4b (p. 47) – Is this a “Check All that Apply”?
29. Question 3.3.4c (p. 47) – Is this a “Check All that Apply”?
30. Question 3.3.5a (p. 48) – Is Yes question a “Check All that Apply”?
31. Question 3.3.5b (p. 48) – Is this a “Check All that Apply”?
32. Question 3.3.6a (p. 49) – Is this a “Check Only One”?
33. Question 3.3.6b (p. 49) – Is this a “Check All that Apply”?
34. Question 3.3.7a (p. 49) – Is this a “Check All that Apply”?
35. Question 3.4.1e (p. 51) – Is this a “Check All that Apply”?
36. Question 3.4.2d (p. 53) – Is this a “Check All that Apply”?
37. Question 3.4.2e (p. 53) – Is this a “Check All that Apply”?
38. Question 3.4.3b (p. 53) – Is this a “Check All that Apply”?

39. Question 3.4.4c (p. 54) – Is this a “Check All that Apply”?
40. Question 3.4.7a (p. 56) – Is this a “Check All that Apply”?
41. Question 3.4.7b2 (p. 56) – Is this a “Check All that Apply”?