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November 23, 2010

The Honorable Kathleen Sebelius
Secretary
U.S. Department of Health and Human Services
200 Independence Avenue, SW
Washington, DC 20201

No: 0970-0114
Child Care and Development Fund Plan for States/Territories for FFY 2012-2013 (ACF-118)

Dear Secretary Sebelius:

ZERO TO THREE appreciates the opportunity to comment on the FY 2012 – 2013 Child Care and Development Fund (CCDF) Plan for States and Territories. ZERO TO THREE's mission is to promote the health and development of infants and toddlers, with a special emphasis on those who are most vulnerable and in need.

We appreciate the Child Care Bureau's goal of increasing the transparency and usability of the information collected in CCDF Plans, which will help states plan for improving child care quality and allow for more readily available aggregate data.

ZERO TO THREE believes a focus on high-need, at-risk children beginning from birth is particularly important. Science tells us that experiences during the first three years of life lay the foundation for all development that follows. We know that brain architecture is built from the bottom up, so that it is crucial for children's early development to be well-supported by all caregivers. Encouraging systems that emphasize quality is especially important to low-income children, who particularly benefit from high quality child care. Unfortunately, many at-risk infants and toddlers often receive child care of such poor quality that it may actually diminish in-born potential. Even though more than half of mothers with children under age three are employed, infant and toddler care is often overlooked. It is important that the Department signal to states the importance of including very young children in their planning, quality improvement, and data collection efforts by requiring reporting on this age group as distinct from three/four year olds.

To improve the applicability of the CCDF plan to infants and toddlers, ZERO TO THREE recommends a change throughout the document to include references to Early Head Start (EHS) wherever Head Start is referenced.

We believe the two programs are often seen as distinct, so states may not interface with or collect data on coordination with EHS programs unless they are specified.

Additional comments are included below, organized by the section of the preprint they address.

Part 1

ZERO TO THREE appreciates the Department’s reorganization of the plan to capture the characteristics of CCDF program administration across all states.

1.5. Consultation in the Development of the CCDF Plan

Section 1.5.1

ZERO TO THREE believes optimum data collection of Lead Agency Consultation efforts will be achieved with the following recommendations:

- In the chart on Page 9, “State/Territory agency with the Head Start Collaboration Grant and/or Statewide Advisory Council Funded by the Head Start Act” should be separated into two separate rows to recognize the distinction between the two entities.
- Require the consultation with the Head Start Collaboration Grantee to include both Head Start and Early Head Start. We believe it is important to specify that consultation and, in Section 1.6.1, coordination with the Head Start Coordination Office should focus on Early Head Start as well as Head Start for 3 and 4 year olds, because of a tendency to focus on the latter group.

Agency/Entity	Identify and describe how the Lead Agency consulted with this Agency/entity in developing the CCDF plan
State/Territory agency with the Head Start Collaboration Grant concerning both Head Start and Early Head Start	
Statewide Advisory Council Funded by Head Start Act	

1.6. Coordination Activities to Support the Implementation of CCDF Services

Section 1.6.1

ZERO TO THREE believes optimum data collection of Lead Agency Consultation efforts will be achieved with the following recommendations:

- Add an additional row/category to include the State/Territory agency responsible for implementing the Maternal and Early Childhood Home Visitation Programs in the Patient Protection and Affordable Care Act.
- In the chart on Page 10-11, “State/Territory agency with the Head Start Collaboration Grant and/or Statewide Advisory Council Funded by the Head Start Act” should be separated into two separate rows to recognize the distinction between the two entities.
- Require the coordination with the Head Start Collaboration Grantee to include both Head Start and Early Head Start.

Section 1.6.2

ZERO TO THREE believes it is important to know how states are coordinating services for different age groups, and therefore data on early childhood coordination plans should

be collected by age group and be inclusive of services for children from birth to age 13. When describing a formal early childhood coordinated plan in this section, we recommend specifying the different age groups included in such a plan: infant-toddler; three/four year-olds; and school age.

Section 1.6.3

Many states have a designated entity specific to infants and toddlers, such as an infant/toddler specialist network. We recommend specifying this as an option.

Part 2

ZERO TO THREE appreciates the Department's plan to capture continuity of care and parental choice of high quality settings across the states.

2.1. Family Outreach and Application Process

Section 2.1.6

ZERO TO THREE believes this section should include specific mention of Early Head Start in addition to Head Start programs.

2.2. Eligibility Criteria for Child Care

Section 2.2.6

This section includes a reference to families enrolled in Head Start; Early Head Start also should be included in the eligibility re-determination.

2.5. Parental Choice in Relation to Certificates, Grants, or Contracts

Section 2.5.3

Again, the check boxes include a reference to wrap-around child care in Head Start, pre-K or other; Early Head Start should be included within the list of these programs.

2.6. Payment Rates for Child Care Services

Section 2.6.6

In the list of options regarding differential rates, it would be helpful to add a question asking specifically whether the differential rate for higher quality is tied to a formal QRIS.

Section 2.6.9

ZERO TO THREE recommends changing the questions a. b. and c. to reflect or incorporate the language from the 2009 CCDF plan, which was previously included in sections 3.2.6 and 3.2.7. The current questions are more difficult to answer and may not elicit necessary information such as how the payment rates are related to ensuring the availability of the full range of providers. The language from the 2009-2010 plan reads as follows:

3.2.6 Describe the relationship between the attached payment rates and the market rates observed in the current survey, including at a minimum how payment rates are adequate to ensure equal access to the full range of providers based on the results of the above noted local market rate survey: (§98.43(b))

3.2.7 Does the Lead Agency consider any additional facts to determine that its payment rates ensure equal access? (§98.43(d)) Yes. If, yes, describe. No.

Part 3

ZERO TO THREE appreciates the Department’s plan to glean Lead Agencies’ goals and strategies for implementation of child care quality improvement activities. Overall, it would be beneficial for Part 3 to include more questions that help provide a picture of how successfully programs serving at-risk children are moving to higher QRIS levels and how states are encouraging such movement.

3.1. Activities to Ensure the Health and Safety of Children in Child Care

Section 3.1.1

Early Head Start should be included in the list of programs in b-1) asking which programs are exempt from licensing.

Section 3.1.3

- Table A, *the health and safety requirements for prevention and control of infectious disease* should include procedures on providing infant nutrition related to breast feeding, breast milk, and formula.
- Table C, *the health and safety requirements for health and safety training* should include a question determining if training relates to the ages of children being cared for. ZERO TO THREE believes this is important, as infant CPR and first aid is very different from that for three/four year olds and school age children, as are child development, supervision, nutrition, physical activity/movement, emergency response, and other topics.

Section 3.1.5

ZERO TO THREE believes it would be beneficial to include a question in the “Goals for the next Biennium” regarding the progress the State/Territory expects to achieve in terms of the goals that relate to age-specific targets.

3.2. Establishing Early Learning Guidelines

Section 3.2.4

ZERO TO THREE believes it is important to ask about trainings specific to each age group, perhaps using a matrix as in other questions.

Section 3.2.7

In Section A: *Data collected on early learning guidelines*, we recommend that the question be designed to determine if the data in each check box/category is collected for

each of the three age groups of children: infant-toddler, three/four year-olds, and school-age.

3.3. Creating Pathways to Excellence for Child Care Programs through Program Quality Improvement Activities including Quality Rating and Improvement Systems

Section 3.3.1

- In 3.3.1(a), we recommend asking if the quality improvement standards include different indicators and benchmarks based on infants/toddlers and school-age children. We note that a later question, 3.3.1(d), does ask if the quality improvement standards align with ELG's broken out by age group.
- We also recommend that states be required to identify indicators that are only covered in licensing and those where the quality improvement standards require improvement upon basic licensing standards.

Section 3.3.2

In Section A: *Identify which types and methods you use to support child care programs*, ZERO TO THREE believes there is a lack of detail (and therefore meaning) in the areas of support that are mentioned. We recommend requiring more data to describe each of the three types of non-monetary supports, so that more useful, qualitative data can be collected regarding the types of information, training, and on-site consultation that is being provided. Additionally, more specific quantitative data surrounding the trainings—such as the number of people participating in the trainings, how frequently the trainings occur, etc.—could be gathered in the Key Data areas in Appendix 1.

Section 3.3.4

ZERO TO THREE recommends:

- (a) Dividing the Environmental Rating Scales row into the separate scales, including: Early Childhood Environmental Rating Scale, the Infant/Toddler Environmental Rating Scale, the Family Child Care Environmental Rating Scale, and others. This would enable the gathering of more useful and specific data on which scales are being used for which population.
- (b) Including Early Head Start in addition to Head Start performance monitoring.
- (c) Including Early Head Start in addition to Head Start as a program accountability initiative.

Section 3.3.6

ZERO TO THREE recommends:

- (a) Requiring states to report what age groups are covered by their QRIS.
- (b) Adding “Early Head Start Programs” to the list of eligible providers in b).

Section 3.3.7

ZERO TO THREE believes it is important to require states to report on data they collect about program quality by the specific age groups being served. This information will

provide greater insight to where quality improvement is occurring and to compare among age groups.

3.4. Pathways to Excellence for the Workforce—Professional Development Systems and Workforce Initiatives

Section 3.4.1

We recommend including a question, perhaps in f), regarding whether licensing standards concerning pre-service and in-service training requirements for staff are specifically related to the state’s core knowledge and competencies (CKC’s). It would be helpful to know which states are requiring these training hours to be directed at a specific goal such as attainment of CKC’s or a credential/degree.

Section 3.4.2

ZERO TO THREE believes the term “career lattice” rather than “career ladder” should be used as the defining term for steps for advancement for the workforce. Advancement can occur in various ways for child care professionals looking to move deeper into an early care and education career, but not necessarily upwards.

In addition, we strongly recommend that this section indicate that the career ladder/lattice for early childhood includes the infant-toddler population, not just pre-school age.

Section 3.4.3

ZERO TO THREE has the following recommendations:

- Under 3.4.3(a), the question regarding content of course offerings of institutions again should be broken out by child age group, including infants and toddlers, to determine whether states are looking at the availability of appropriate training for practitioners serving different ages of children.
- Section 3.4.3(b) should specify that infants and toddlers are a distinct subset of an “Early care and education and school-age certification/credentialing system”.

Section 3.4.4

In 3.4.4(d), we recommend that “Yes” answers be required to indicate where mentors and coaches are used for practitioners serving all the different age groups, infants/toddlers, three/four year-olds, and/or school-age children, again making the distinction between age groups within early childhood.

Section 3.4.5

In 3.4.5(c), we again recommend “Yes” answers be required to indicate where career advisors are used for practitioners serving all the different age groups, infants/toddlers, three/four year-olds, and/or school-age children.

Section 3.4.7

In 3.4.7(a), we recommend that in reporting on data collected on the child care workforce, states be required to indicate the ages of the children for which individual practitioners are caring.

Appendix 1: Quality Performance Report

In keeping with our recommendations for each section of the plan, ZERO TO THREE strongly recommends incorporating data collection specifically related to infants and toddlers into the Quality Performance Report as well.

In conclusion, we appreciate your consideration of ZERO TO THREE's comments on the Child Care and Development Fund Plan for FY 2012-2013. We are happy to meet to discuss our recommendations in more detail. We look forward to continuing to work with you in improving the quality of child care for infants and toddlers.

Sincerely,



Matthew E. Melmed
Executive Director