



**Department of
Job and Family Services**

Ted Strickland, Governor
Douglas E. Lumpkin, Director

November 23, 2010

Administration for Children and Families
Office of Administration,
Office of Information Services
370 L'Enfant Promenade, S.W.
Washington, DC 20447
Attn: ACF Reports Clearance Officer

Re: Child Care and Development Fund Plan for States/Territories for FY 2012-2013 (OMB No. 0970-0114)

Thank you for the opportunity to comment on the proposed FY 2012 – 2013 Child Care Development Fund Plan Preprint for States and Territories published in the September 24, 2010 Federal Register. Ohio appreciates the consolidation of the Preprint into three sections: 1) Overall Administration; 2) CCDF Subsidy Program Administration; and 3) Health and Safety and Quality Improvement Activities. The Preprint appears to be more organized and focused, especially on Health and Safety and Quality Improvement. Ohio likes the reduction of narrative and the use of drop down lists to capture state data.

Part 1 Administration

Section 1.3.1 Ohio is State sponsored and County administered and none of the options listed fit. Do most State sponsored and County administered programs have rules promulgated at the local level? We would put our option under "Other."

Could sections 1.5.1 and 1.6.1 be consolidated?

Should the Preprint specifically ask if State Administrators serve on their Early Childhood Advisory Councils?

Part 2 CCDF Subsidy Program Administration

Section 2.1.3 Describe how the Lead Agency informs or educates parents applying for CDFE assistance – there is really not an assessment.

30 East Broad Street
Columbus, Ohio 43215
jfs.ohio.gov

An Equal Opportunity Employer and Service Provider

Section 2.2.3 There is no place to define “residing with” or could these all be collapsed in Section 2.2.1 – it’s a little confusing.

Part 3 Health and Safety and Quality Improvement Activities

Section 3.1.3, question d) do you want to know about relatives living in a separate residence or in the same residence?

Section 3.1.4, question a)

Number of programs operating that are legally exempt from licensing – Ohio does not make programs register so we do not know this number

Define injuries – possibly serious – Ohio’s definition is as follows:

Serious Incident/Injury/Illness includes any situation occurring while a child is in care of the center, that requires emergency medical treatment or professional consultation or transportation for emergency treatment. Examples of incidents requiring to be reported report are: an illness, accident, or injury which requires first aid treatment; a bump or blow to the head; emergency transporting, or an unusual or unexpected event which jeopardizes the safety of children or staff, such as, a child leaving the center while unsupervised.

Number of programs dropped from CCDF due to non-compliance with health and safety requirements – Ohio would recommend changing the word revoked vs. dropped.

Quality section: Ohio is willing to conduct a self-assessment on our current quality improvement activities and set goals for the upcoming biennium.

Section 3.2.7 Data collection on early learning guidelines would be limited to programs participating in our QRIS which is only 20% of our population vs. the universe of child care.

Evaluation – how extensive – research based – this is difficult since the guidelines are primarily housed in the Ohio Department of Education and also under major revision at the present time.

3.3 Creating Pathways to Excellence for Child Care Programs through Program Quality Improvement Activities including Quality Rating and Improvement Systems (Component #3) - Ohio applauds the Office of Child Care for including QRIS in the State Plan PrePrint and would like to see it remain in the plan. Due to upcoming budget constraints, it’s difficult to say what will be funded and to what degree.

Section 3.3.3 Definition for License-Exempt Providers as we believe states have different definitions for this category of care.

Section 3.4.1 Core Knowledge and Competencies should be developed for practioners in the field, not broken out by age groups.

Section 3.4.2 Ohio has a Career Pathway, but not a Career Ladder so none of the questions could be answered in this section. These terms are different according to NAEYC. Please use both terminologies.

Section 3.4.3, question a) Although Ohio has a good working relationship with the higher education community, the Bureau of Child Care and Development does not have capacity to assess course offerings.

Section 3.4.3, questions a, b, c) Would like the opportunity to respond: some higher education institutions are aligned or provide, but not all institutions.

Section 3.4.5, question b) Ohio offers lots of free training. We are not sure the drop down list covers this option.

Section 3.4.7 Data collection on the child care workforce would only be limited to staff participating in our Ohio Professional Development Registry which is voluntary at the present time. It probably only encompasses 20% of our population vs. the universe of child care staff.

Quality Performance Report – Appendix 1

Could this section not be included as part of the State Plan Pre-Print? The Office of Child Care could work with State Administrators to further develop the reporting mechanics for the state plan.

Section 1.2.1, b) Licensed home-based programs – in Ohio we have to be able to answer this question as Certified home-base programs as our counties certify, not license homes.

Section 1.2.5 How many previously license-exempt providers were brought under the licensing system as of the end of the last fiscal year – Ohio does not collect this data.

Note: Many of the data sets, Registry, Training, Coaching will be specific to Ohio's Step Up to Quality program, our QRIS. This "universe" is approximately, 20% of our center population. Our QRIS does not serve family child care, nor licensed-exempt practitioners.

Section 2.2.1 Ohio would caution ACF in having states determine proportion of programs – this needs to be better defined. We could only report on programs participating in our QRIS. A better question might be to ask, "How many providers were trained on early learning guidelines?"

Ohio has no way of knowing how many children are served in programs implementing the ELG's. Again, we could assume all centers participating in our QRIS. There are other child care centers that probably implement ELG's, but we do not track them. There would be no data on FCC or legally exempt care.

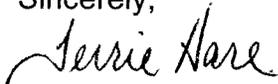
Section 4.2.4 Again, Ohio has a good working relationship with the higher education community, however, the Bureau of Child Care and Development does not have capacity to know the number of credentials and degrees awarded.

Section 5.1 How Were CCDF Quality Funds Spent?

Although Ohio has a detailed Quality budget, it is currently not at this level of reporting and therefore, we could not report out on the percentages.

Ohio thanks you for your continued commitment to improving the number of high quality choices available to low-income families through CCDF. Thank you for considering our comments. If you have any questions, please contact me at Terrie.Hare@ifs.ohio.gov or 614/752-0580.

Sincerely,

A handwritten signature in cursive script that reads "Terrie Hare".

Terrie Hare
Bureau Chief