



October 21, 2022

Office of Planning, Research, and Evaluation
Administration for Children and Families
330 C Street, S.W.
Washington, DC 20201

Re: Proposed Information Collection Activity; The Role of Licensing in Early Care and Education (#2022-18154)

To Whom It May Concern:

On behalf of Learning Care Group (LCG), I am grateful for the opportunity to comment on the Office of Planning, Research, and Evaluation's ("Office") *Proposed Information Collection Activity; The Role of Licensing in Early Care and Education*, specifically with respect to the potential survey of licensed child care providers.

Learning Care Group is the second largest for-profit early care and education provider in North America, headquartered in Novi, Michigan. LCG is a leader with 50 years of experience in providing high-quality child care and early education programs for children ages six weeks to 12 years. With 1,056 schools in 39 states and the District of Columbia, LCG has approximately 23,000 employees and the capacity to serve more than 160,000 children. Approximately one-third of children served in our schools receive some financial support (i.e., Child Care and Development Block Grant) to afford high-quality early education and care. We also play a critical role for ensuring food security for vulnerable children, serving approximately 22 million meals annually to young children through the Child and Adult Care Food Program. LCG is known through its 11 family brands: AppleTree & Gilden Woods Early Care and Preschool, The Children's Courtyard, Childtime Learning Centers, Creative Kids Learning Center, Everbrook Academy, La Petite Academy, Montessori Unlimited, Pathways Learning Academy, Tutor Time Learning Centers, U-GRO Learning Centres, and the Young School.

As a leader in early childhood education, LCG is deeply invested in improving the industry. Our half-century of providing high-quality child care and early education programming has taught us that implementing meaningful improvements requires considerable gathering information. We view the Office of Planning, Research, and Evaluation's efforts to survey the early education industry as an early step to helping providers like LCG better serve American families. The company is committed to evolving in tandem with the changing needs of the children in its care, and we commend the Office for similarly reflecting on the growth of the early care and education industry.

We hope the Office will consider the following logistical recommendations as the Office drafts the survey to be circulated among licensed providers. First, we urge the Office to draft a survey that is as user-friendly as possible. An Internet-based survey that lends itself to easy completion using multiple-

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choice questions where appropriate and can be submitted immediately is more likely to be completed by child care providers, who increasingly find themselves pressed for time amid staffing shortages and high demand for care. Second, the Office should expand the pool of center-based providers to be surveyed. Center-based providers include corporate providers, nonprofit providers, and faith-based providers, among others. The Office currently proposes to capture that wide range of perspectives by surveying only 1,000 respondents nationally. We worry that such a small sample size will fail to accurately reflect the diversity of the industry, compromising the overall effectiveness of the survey. Third, we encourage the Office to add an additional cohort of survey respondents: former providers who permanently closed their child care centers during the pandemic. Responses from this cohort will shed light on the extent to which state licensing requirements contributed to the discontinuation of their operations. The pandemic exposed the cracks in the child care landscape, so this information is essential to developing a more complete understanding of state licensing regimes.

Additionally, we encourage the Office to incorporate the following five substantive considerations into the survey. First, the survey should seek to uncover the vast differences between state licensing requirements that occasionally lead to drastic differences in how states interpret and enforce similar rules. Second, we similarly suggest the survey press respondents to explain how states collaborate with stakeholders to develop licensing requirements. Third, we recommend asking providers about the extent to which states differentiate between violations that risk the health and safety of children and less serious violations when labeling a provider noncompliant. Fourth, the survey should probe the extent to which state licensing regimes discourage technological adaptation, including in the maintenance of inspection, violation, and staffing records. Finally, the survey should solicit feedback from providers on training mandates, which often present logistical challenges to providers. For example, some states may provide training less frequently than a region of providers demands. These inquiries will provide crucial insight into the barriers providers face in navigating state licensing requirements to the benefit of the Office's larger goal.

We appreciate the Office's attention to this issue and leadership in helping children and families. LCG looks forward to ultimately learning from the licensed child care provider survey results. Please do not hesitate to reach out if LCG can be helpful to the Office as the survey progresses.

Sincerely,



Johnna L. Weller, Ed.D.
Chief Academic Officer
Learning Care Group

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