

Summary of changes to 2025-2027 CCDF Plan Preprint for States and Territories

March 2024

Public Comments

During the 30-day public comment period, the Office of Management and Budget (OMB) received 230 comments on the draft 2025-2027 CCDF Preprint for States and Territories (Preprint), submitted by 22 entities including State lead agencies, state and national early childhood organizations, and school age organizations. Of those, 169 comments requested a change in the Preprint. The remaining comments offered positive feedback to OCC on the simplification of the Preprint, the emphasis on areas like limiting costs for families, supporting the child care workforce, improved payment practices, the addition of school-age considerations within questions, and the acknowledgement of goals identified in the recently published CCDF rule. In some cases, commentors expressed appreciation for changes made in response to their earlier comments on the 60-day public comment version of the Preprint.

OCC finalized the Preprint taking into consideration the public comments, made some additional changes based on feedback, and identified opportunities for additional training and technical support to grantees as the final Preprint is published and they prepare and submit their 2025-2027 CCDF State and Territory Plans. Below is a summary of these categories with bulleted examples.

Changes to the Preprint

During the public comment period, OCC made changes to the Preprint to increase consistency and clarity, reduce burden, and to correct technical errors in the document. In addition, some changes were made to align questions with the recent final rule, 45 CFR Part 98. There were no major structural changes made in this round of edits.

In some cases, the changes OCC made responded to comments submitted through the public comment process, including requests that the Preprint provide mechanism(s) for Lead Agencies to talk about their plans for fully implementing CCDF policies in alignment with the new rule.

Examples of changes within the Preprint responding to comments:

1. Strengthened focus on how providers, families and the general public are engaged in multiple languages in a variety of CCDF processes.
2. Simplified data collection when co-payments are set by local entities.
3. Clarified that health and safety standard training requirements should be appropriate to the provider setting and age of children.
4. Identified that the quality needs assessment should include the perspective of parents in addition to providers.
5. Clarified that Lead Agencies need not limit processes for filing complaints about providers to parental complaints.
6. Asked Lead Agencies how they will make their QPR reports available to the public.
7. Consistently allow for explanation of non-compliance or progress on questions related to CCDF requirements.
8. Clarified questions and their instructions.
9. Reduced the number of website links requested.

10. Edited for consistent and accurate use of “State/Territory” and “Lead Agency” language.

Comments that did not result in changes

Examples of comments that OCC could not accommodate due to constraints in CCDBG Statute and/or CCDF Rule:

- Requests for an extension of the deadline to submit a final state plan.
- Requiring additional entities to be consulted in the development of the Plan, beyond those required by law.
- Change physical activity and nutrition from optional health and safety standards to required health and safety standards.

Examples of comments that did not result in a change because they went beyond the scope of CCDF or because they would add to Lead Agency burden.

- New section on facilities needs assessment and funding opportunities asking states to identify their likely facility needs as the climate continues to change
- Additional question that prompts Lead Agencies to explain accountability measures they employ to ensure workforce support funding is reaching workers as intended.
- Additional question requiring States/Territories to describe how they will ensure all data reported to the federal government by States/Territories will be reported across the categories of race, ethnicity, income, language, geographical location, and disability category.
- Additional question requiring states to conduct and track racial and language-based pay gaps within the workforce, and that these data on pay gaps be used to inform the CCDF Plan and broader efforts to support fair compensation for the ECE workforce.
- Additional question asking Lead Agencies to explain how they ensure that providers are protected against the financial burden of late payments or are made whole.
- Additional question requiring Lead Agencies to indicate whether they have whistleblower and worker retention policies for workers making complaints, and if they collect up-to-date worker contact information to communicate directly with child care workers to share information in both directions.
- A requested requirement that the number of expulsions and suspensions also be available to families through the Consumer Education website.

Comments that will inform the training OCC provides to Lead Agencies (examples)

- Suggestions on how grants and contracts for child care services can be used to improve stability of services.
- Areas where data could be collected to inform future policy.
- Recommendations on how recruitment and retention of the workforce can be strengthened.
- Ways in which Lead Agencies can include the voices of early childhood staff in policies that impact them.
- Providing examples of how culturally and linguistically appropriate early learning guidelines can be developed.

- Ideas on how equity, inclusion, cultural and linguistic responsiveness can be strengthened in the early childhood system.