

The Office of Child Care received 372 total comments during the 60-day public comment period on the 2025-2027 CCDF Plan Preprint for States and Territories. Of these, 260 comments requested changes. Comments were received from 19 organizations, including national organizations, school age organizations, Lead Agencies, Office of Child Care staff, and national technical assistance center staff. Several commenters referenced the proposed rules that were issued in July of 2023 (88 FR 45022).

Comments are organized based on whether edits occurred or not. A third group is comprised of comments that will be addressed in training or technical assistance resources. Below is a summary of these categories with bulleted examples.

Question Edited in draft 2025-2027 CCDF Plan Preprint for States and Territories

Seventy-seven of the comments resulted in edits to the draft 2025-2027 preprint. These edits were either made as recommended in the comment or to align with part of the comment.

- **The question was edited as recommended in the comment.**
 - o *Example: Section 1.3.1d of the preprint could be modified as follows: “Although not required, identify other entities, agencies, or organizations consulted on the development of the CCDF plan (for example, statewide afterschool networks).” Action taken: Edited 1.3.1 d*
 - o *Example: We recommend that the topic of “Compliance with employment and labor laws” be added to the checklist at 6.2.7(c). In our experience, many child care providers do not understand or comply with these laws, and violations can interfere with workforce recruitment and retention. States should be encouraged to educate providers about these laws and how to stay in compliance. Action Taken: Added option to 6.1.4 c. 10.*
- **The question was edited to align with part of the comment.**
 - o *Example: LEP families should have equitable access to participating in public hearing processes. Lead agencies should be required to provide clear proof of available translations of announcements and vital hearing notices and provide interpretation services for public hearings in at least the state or territory’s top languages and advance notice of their availability. Action Taken: Added language in 1.3.2 c.*
 - o *Example: 1.4.1.a Cross-Agency Coordination: We recommend that ACF leverage this section of the state plans to gather information specifically about how cross-agency coordination supports children with disabilities in receiving IFSP/IEP services in their preferred setting that best meets their families’ needs. Action Taken: Inserted suggestion in introduction to 8.1.1.*

No Change

Changes were not made for 149 of the comments. There were a number of reasons why OCC did not make changes suggested in the public comments, including:

- **Would create a burden for Lead Agencies.**
 - o *Example: 5.4 - Monitoring and Enforcement Policies and Practices for CCDF Providers - The plan (5.2.3) should include the reporting of the average statewide wage, in addition to already required reporting of teacher/caregiver qualifications. This can serve as a way to nationally collect teacher wage data.*
 - o *Example: We suggest the Child Care Resource and Referral system include race, gender, and dual-language learner data collection for infant and toddler early intervention and school-age early intervention, to determine race, gender, and dual-language learner differences in*

receipt of early intervention services in order to address racial disparities in accessing services.

- **Would create additional burden beyond the current requirements.**
 - *Example: 1.2.5 - CCDF Policy Decision Authority* The draft plan states Lead Agencies must have in effect policies to govern the use and disclosure of confidential and personally identifiable information about children and families receiving CCDF assistance and child care providers receiving CCDF funds. We understand the importance of accessing data for both the Lead Agency and external partners to ensure CCDF goals are being met. We believe the Lead Agency should also describe how policies will protect confidential and personally identifiable information without unnecessarily limiting access to data and delivery on data requests, as well as how the Lead Agency makes data publicly available.
 - *Example: This section (on quality funding investments) needs a chart on school-age child care/out-of-school time that is parallel to the infant and toddler chart.*
- **Appears to conflict with statute or rule.**
 - *Example: 4.2 - Assess Market Rates and Analyze the Cost of Child Care* The plan (4.2.6) requires the state to report the results of the estimates of the cost of care by geographic location, category of provider or age of child to support providers' implementation of health, safety, quality, and staffing requirements and high quality care. In order to fully and adequately report the cost of care and adequately ensure all major factors driving program cost are considered, such as program type, quality level, geographic region, age of child, part/full time child care, cost to compensate teachers appropriately, etc. an alternative methodology must be conducted. A market rate survey examines the fees that child care providers typically charge and parents typically pay per unit of care in the priced child care market. We strongly recommend the Office of Child Care move to require states to use an alternative methodology, rather than the market rate survey, to conduct rate setting.
 - *Example: Use the language "early education and care and out-of-school time programs" rather than "child care" wherever applicable and distinguish between the two (i.e.: it's okay use early education when talking about developmental screening)*
- **Suggestion already allowed for in CCDF policy.**
 - *Example: We recommend requiring States/Territories to report on specific training and professional development around how they support the child care workforce to support special populations. ○ For example, after 6.2.1.c on page 132 of the 2025-2027 CCDF State Plan Draft, we recommend adding a new subsection "d" reading, "Effective practices and support for special populations identified in the state- or territory-determined priority populations served through CCDF such as dual language learners through dual language education or how to support children's home language development when providers do not speak their home language."*

- *Example: The plan requires states to report if providers are allowed to charge families additional amounts above the required co-payment, when the provider's price exceeds the subsidy rate. We acknowledge that states should aspire to increase payment rates so there is no longer a need to charge this difference, creating more stable payment for providers and eliminating a financial hardship on families, states should be required to report the barriers to increasing payment rates, creating stable payments for providers and eliminating hardship for families.*
- **Comments related to proposed policies where status is pending**
 - *Example: 3.1.6.d Using cross-enrollment or referrals to other public benefits: We recommend updating this in light of the proposed rules in Improving Child Care Access, Affordability, and Stability in the Child Care and Development Fund (CCDF) (Docket Number: ACF–2023–0003 / RIN Number: 0970–AD02) regarding using eligibility for other public assistance programs to determine child care subsidy eligibility.*
 - *Example: 3.3.5 Eligibility Grace Period for Children Experiencing Homelessness and Children in Foster Care: We recommend clarifying this section to reflect the three month presumptive eligibility period proposed for all children eligible for child care subsidies in Improving Child Care Access, Affordability, and Stability in the Child Care and Development Fund (CCDF) (Docket Number: ACF–2023–0003 / RIN Number: 0970–AD02) (i.e. Would states be permitted/encouraged to create grace periods of longer than three months for these populations? Does a grace period for immunization and health/safety requirements also automatically accompany the three-month presumptive eligibility period for all children?)*
- **Information collected in other CCDF report(s).**
 - *Example: Sec 7.3.6 Identifying supports available to both licensed and licensed exempt programs will be extremely helpful given the status of school-age programs in many states as being license exempt. o Recommendation: If the above is not possible, the plan may explicitly ask what percentage of your CCDF eligible school-age programs are: (a) licensed (b) license-exempt.*
 - *Example: In addition, data on the implementation and reach of child care subsidies are reported in the aggregate, leaving states, the federal government, and the public uninformed about how services are impacting outcomes for particular groups of children, such as children of color, those with disabilities, and those in rural communities. With more refined data reporting requirements and disaggregated data where possible, States/Territories can make fair, data-informed, and relevant policies that directly affect the access, experiences, and outcomes of children and families.*

Training and/or technical assistance resources

Sixty of the comments will be addressed within training and/or technical assistance resources.

- *Example: In section 7.3.7, we appreciate the data collection on how Lead Agencies are conducting transparent review of their quality improvement activities. We recommend including questions focused on how Lead Agencies use data collection particularly for assessing quality improvements in historically marginalized communities or community-based programs. CSCCE has published a number of resources on data collection for equity indicators such as this blog post and the Workforce Data section of the 2020 Workforce Index. Additional questions may probe how Lead Agencies are incorporating the feedback of workforce members, community-based groups, families and other key stakeholders into their quality improvement and assessment activities.*

- *Example: 7.5 Child Care Resource and Referral: We encourage ACF to inquire CCR&R agencies are identifying diverse language needs in their communities and taking steps to meet those needs to ensure full accessibility of these critical resources to all providers and families.*
- *Example: 3.4.3.c Notifying Families of Changes to Reporting Requirements: We encourage ACF to inquire about states' plans for notifying families experiencing homelessness and housing instability of changes to reporting requirements to avoid an impact on continued eligibility between redeterminations.*