Dear [State Contact Name if one included],

Thank you for the opportunity to submit written comments on [your state’s] 2022-2024 Child Care and Development Fund (CCDF) state plan. As a [child care provider/parent/other role], I am an advocate for a child care system that serves all children, their families, and early childhood educators. Child care provides critical development and enrichment opportunities for children of all backgrounds and is a vital building block of our state’s economy.

**[Add a sentence or two about your personal experience and connection to child care here].**

States are in a unique position as they develop their CCDF state plans this year. COVID-19 has shown us how important child care is for our communities, but it has also shown us the hardships it has been struggling with for years. These hardships have only been made worse by the pandemic. The CCDF state plans are also being developed while a historic investment in flexible federal funding for child care has been passed into law. These funds can help us set the stage for years to come by supporting long-term changes in our state CCDF plans that make high-quality child care affordable and accessible for everyone.

This comment period provides an opportunity to share what changes can help rebuild child care so it is stronger than ever before and how our state’s CCDF plan can help us get there. We need to make sure our state plan includes policies that are child-centered, family-engaged, equity-driven, and community-focused. To accomplish this, I strongly encourage you to include the following recommendations in our state plan.

**Section 1: Define Leadership and Coordination**

* **Ensure funding and resources exist to support CCR&Rs to continue and expand their work** (Section 1.7). Child Care Resource and Referral agencies (CCR&Rs) are the connectors in many communities across the country. They play an important role in offering technical assistance to providers and families, as well as building the supply of quality care. As the eyes and ears of America’s child care system, CCR&Rs play a central role in the system’s recovery from the pandemic. As such, states must continue to invest in CCR&R’s ongoing work to build the supply of high-quality child care, provide technical assistance and trainings to families and providers, and support emergency response efforts. Federal relief funds can be used to support CCR&Rs.

**Section 3: Provide Stable Financial Assistance to Families**

* **Expand the definition of eligible children and families** (Section 3.1). To be eligible for CCDF subsidies, parents/guardians must be working or attending a job training or educational program, but states have flexibility in defining what these terms mean. States can expand the approved activities used for eligibility criteria, like counting travel time toward education activities, and eliminating other restrictive policies, like requiring child support cooperation.
* **Increase income eligibility levels for child care subsidy** (Section 3.1). States can set income eligibility limits at or below the federal limit of 85 percent of the state median income (SMI). To help more families access child care, some states have increased income eligibility for subsidies during COVID-19 or provided care to essential workers at no/reduced charge without regard to income levels. Recent federal relief packages passed by Congress have let states extend child care assistance to essential workers (including health workers, sanitation workers, and others) despite their level of income. This has allowed states to provide care to families who exceed the 85% income eligibility threshold at no charge. The American Rescue Plan, which includes $15 billion for CCDBG, continues this exception for essential workers.
* **Extend eligibility and redetermination periods** (Section 3.1 and 3.2). State plans must establish minimum 12-month eligibility before their eligibility redetermination. Longer periods of eligibility and redetermination periods increase continuity of subsidy receipt and stability of child care arrangements. Some states put automatic renewals in place for redetermination during the pandemic, without needing any documentation from families, to further support families.
* **Permanently waive or significantly reduce parent copayments** (Sections 3.2). States are required to establish affordable family contributions to payments for care (called copayments) based on income and the size of the family. States have flexibility in minimizing or waiving the cost of the copayments for eligible families altogether, as many have done recently using federal relief dollars.

**Section 4: Ensure Equal Access for Low-Income Children**

* **Invest in child care health and mental health consultants** (Sections 4.1). States must identify the activities that will improve the supply and quality of child care programs. Child care health and mental health consultation services play an important role in helping early childhood educators (ECEs) implement practices that promote healthy and safe environments for young children and whether the needs are physical or social-emotional. We must ensure that both health and mental consultants are available to child care providers, with the funding and resources needed to serve all providers and children.
* **Use an alternative methodology to set CCDF payment rates and apply for the new temporary waiver** (Section 4.2). State plans must set child care payment rates based on a recent market rate survey (MRS) or an approved alternative methodology. Basing child care rates on market prices hurt low-income areas the most because there are discrepancies between market prices and the cost of care. A dependency on these surveys for determining the price of care will continue to cripple the industry. States are given an opportunity in the new plan to apply for a temporary waiver of up to one year for meeting the deadline to determine new subsidy rates and should use this extended timeline to explore alternative methods. CCR&Rs have the tools and resources to help states develop a new rate methodology.
* **Increase provider reimbursement rates** (Section 4.3). State plans set the maximum amounts that will be paid to child care providers at a level sufficient for them to meet health and safety, quality, and staffing requirements. When states increase provider reimbursement rates, they incentivize providers to increase capacity and open more slots to subsidy-eligible families and ensure the sustainability of their businesses. States have increased reimbursement rates to providers with relief funds and continued investment in provider reimbursement may also serve as a means to recruit new providers.
* **Using enrollment versus attendance and expand use of contracts** (Section 4.4). Paying child care providers based on a child’s daily attendance rather than overall capacity leaves payment amounts unpredictable each month, while costs remain stable, and makes it challenging for programs to have financial stability to build a high-quality program. States should consider structuring provider payments based on enrollment to provide stability for providers who have no control over a children’s attendance patterns. Additionally, moving to a contract funding model can help provide stability for the child care sector. Contracts guarantee providers a certain number of spaces to serve children, making reimbursements predictable and reliable. Direct contracts may also serve to expand access to child care in areas that have low numbers of child care centers.

**Section 5: Establish Health & Safety Standards & Monitoring**

* **Continue to support health and safety improvements around ratios and group sizes, inspections, and background checks** (Section 5). Children deserve a high-quality, safe environment to grow and learn. It’s imperative that our state works toward a system with the well-being of the whole child at the heart of our CCDF state plans.  This means having strong health and safety standards in place that do not step back from the expansive changes included in the 2014 CCDBG Act. We must ensure strong standards continue to exist around background check and inspection requirements, as well as ratios and group sizes, as we move on from the pandemic.

**Section 6: Recruit and Retain a Qualified and Effective Child Care Workforce**

* **Ensure funding and resources exist to support CCR&Rs to continue and expand their work** (Sections 6.1 and 6.2). States must describe their framework for training and professional development. Each state must develop and implement strategies to strengthen the business practices of child care providers to expand the supply and to improve the quality of child care services.  Child Care Resource and Referral agencies (CCR&Rs) play an important role in offering this assistance to providers but need additional investment to carry out a host of other supports – including helping providers open and run their businesses, providing ongoing training and professional development, and helping providers maintain or meet licensure requirements.

CCR&Rs play a role in building the supply of quality care through staffed family childcare networks, which provide ongoing support relating to licensing, professional development, training, and financial resources. States must continue to invest in CCR&R’s ongoing work around providing much-needed technical assistance to help the sector recover from the pandemic, which can be supported with federal relief funds.

**Section 7: Support Continuous Quality Improvement**

* **Support an increase in compensation, comprehensive benefits, and professional development opportunities for child care providers** (Section 7.3).  States must note if they provide financial incentives and other supports designed to expand the diversity of child care options and help child care providers improve the quality of services. One of the most effective ways states can support providers within their communities is by using these funds to increase wages and provide benefits for child care educators.

Nearly 15 percent of child care workers live below the artificially low “official” poverty line, more than double the rate of other industries. Providing increased compensation or bonus pay to providers can help staff stay on payroll if a center needs to temporarily shut down or consider staffing cuts. It can also help with recruiting and retaining the child care workforce, which has experienced significant job loss over the course of the pandemic. Failure to support early childhood educators, who are generally women and disproportionately women of color and immigrant women, will leave providers without a workforce and families without providers on which to rely. Federal relief funds can be used toward increasing wages and benefits for providers.

**Conclusion**

Thank you for providing the opportunity to give input to our 2022-2024 CCDF state plan. As a [child care provider/parent/other role], and child care advocate, this is personally important to me because [insert reason]. I look forward to seeing a final plan that keeps us moving toward our goal of serving all children, families, and early childhood educators.

Sincerely,

[Your name]