

Attn: Administration for Children and Families, Office of Planning, Research, and Evaluation, Attn: ACF Reports Clearance Officer, and Office of Information and Regulatory Affairs, Office of Management and Budget, Paperwork Reduction Project, Desk Officer for ACF

From: Jodi Grant, Executive Director, Afterschool Alliance

Re: Child Care and Development Fund Plan for States/Territories for FFY 2019-2021(ACF-118)

OMB No.: 0970-0114

Date: January 5, 2018

Sent via email to [infocollection@acf.hhs.gov](mailto:infocollection@acf.hhs.gov) and [Stephanie J Tatham@omb.eop.gov](mailto:Stephanie_J_Tatham@omb.eop.gov)

Thank you for the opportunity to comment on the draft FY 2019-2021 Child Care and Development Fund State/Territory Plan Preprint (OMB No.: 0970-0114).

The Afterschool Alliance is a non-profit organization working with over 26,000 partners to ensure that all children and youth have access to quality afterschool and summer learning opportunities that keep children safe and well nourished, and provide engaging, hands-on activities that raise school attendance, academic achievement and graduation rates. We work closely with local, state and national partners to increase the reach and quality of school-age care provided after school and during the summer through Child Care Development Block Grant (CCDBG) funding.

We applaud the thoughtful progress in this pre-print draft. It offers strong opportunities for states to best meet the needs of youth across the ages of birth to 13.. According to the most recent data, 35% of children receiving CCDF subsidies in 2015 were school age (six and up).

State policies that are conscious of the need to consider different ages in their plan and implementation help to build quality access for more youth. Conversely, policies that overlook the distinct needs of school age care can unintentionally incentivize school age providers to opt out of the CCDF funding at a large loss to families and youth in need of services.

Many sections throughout the pre-print show a careful awareness of the need for variations based on the age of children and youth in care including:

- **5.2.2** On Health and Safety Standard: Which is well designed in asking, in every area, for the state to describe any variations based on the age of the children in care. A resource that might be listed as helpful for states to consult for school-age specific health and safety guidelines are the National AfterSchool Association Healthy Eating and Physical Activity Standards.
- **1.4.1** On the required inclusion of Statewide Afterschool Networks as a coordination partner to expand accessibility and continuity of care will greatly improve state's abilities to meet the needs of school-age children.
- **5.3.5** On licensing inspectors: Which requires inspectors to receive training appropriate to the provider setting and age of children served
- **6.2.5** On training and professional development: Which ensures the requirements described as appropriate to the age of children served

- **6.3.1** On Developmental guidelines: Which allows states to develop out-of-school time guidelines and use quality set asides to this purpose

Other sections would benefit from explicitly drawing the states attention to consider school age differentiation. We encourage inclusion of school-aged-care partners in any decision making processes and emphasizing consideration of aged-based differentiation in areas such as licensing, quality, and professional development. Please consider these priority recommendations as well as the complete list below:

- **1.4.1 On Coordination: Where the plan asks for coordination with the state/territory agency responsible for public education including pre-k, could benefit from adding “including pre-k and 21<sup>st</sup> Century Community Learning Centers Title coordinators” (This could also be added under optional partners)**
- **1.7 Coordination with CCR Systems – add including school aged afterschool and summer programs to the following language “full range of child care options (including faith-based and community-based child care providers)”**
- **5.1.3 On Licensing Exemptions for Center Based Care: Could specifically differentiate between school-age and non-school age, or say “describe the exemptions, including those for different age categories”**
- **7.2.1 On Use of Quality Funds: Include a box similar to “Developing, maintaining, or implementing early learning and developmental guidelines”, for school aged guidelines.**

The full list of our recommendations follows:

- **1.3.1** Add Statewide Afterschool Networks or other school-age entity as additional entity to be consulted.
- **1.4 and 1.5** General Sections for Coordination and Combined funds: add in a line for school age in the following “These programs include those operating at the federal, state, and local levels for children in preschool programs, tribal early childhood programs, and other early childhood programs, including those serving infants and toddlers with disabilities, homeless children, and children in foster care(658E(c)(2)(O)(ii))”
- **1.4.1** On coordination: Where the plan asks for coordination with the state/territory agency responsible for public education including pre-k, could benefit from adding “including pre-k and 21<sup>st</sup> Century Community Learning Centers Title coordinators” (This could also be added under optional partners)
- **1.7** Coordination with CCR Systems – add including school aged afterschool and summer programs to the following language “full range of child care options (including faith-based and community-based child care providers)”
- **2.3.6** On identifying quality information with selection boxes including Head Start/ Early Head Start and prekindergarten: Could benefit from the addition of a specific box for “school age standards (where applicable)”
- **5.1** On Licensing requirements: The description of exemptions must include “any exemptions based on provider category, type or setting:” Could be beneficial to add “age categories” to this list
- **5.1.3** On licensing exemptions for center based care: Could specifically differentiate between school-age and non-school age, or say “describe the exemptions, including those for different age categories”
- **5.2.1 (a,7)** Describe the qualifications for director for licensed CCDF center based care: Could add, “describe any variations based on the age of children in care”

- **5.2.3 and 5.2.5** On Pre-and Ongoing Health and Safety Training: Unlike the health and safety *standards* this training section neglects consideration of separate needs for school age providers – for example (#2) on the prevention of sudden infant death syndrome and safe sleep practices does not provide room to explain different requirements and practices by age. We recommend each of these (1-13 in each section ) include a line to “explain any differences by age category
- **6.1.2** Describe how the state developed training and development requirements: would benefit from adding including statewide afterschool networks or similar school age entity where applicable
- **6.3.1** On developmental guidelines: While out-of-school time standards are mentioned in descriptive text, states would benefit from the ability to provide an explanation of the standards by adding a section (g) “If applicable, discuss the state process for the adoption, implementation and continued improvement of state out-of-school time standards”
- **7.2.1** On Use of Quality Funds: Include a box similar to “Developing, maintaining, or implementing early learning and developmental guidelines”, for school aged guidelines.
- **7.4.2 (a)** On QRIS Systems: Include an additional box for states to explain if participation varies based on age group – part b of this question reveals that a state may have a more complex system that does not fit into one of the 3 boxes
- **7.4.3** On Support and assess the quality of child care providers: Could benefit from a box for “programs that meet all or part of state/territory school age quality standards”
- **7.10.1** Efforts to adopt high quality school age standards – Include a box to show which states/territories have supported efforts to develop school age standards.

States will benefit from leveraging the afterschool community. There are now statewide afterschool networks in all 50 states working on quality and access of school-age youth to out-of-school time programs. Forty states currently have school-age quality standards and guidelines and another five are in the process of developing them. State networks and other partners are working on assessment tools and the development of core knowledge and competencies for the field. More than half have Quality Rating and Improvement Systems for school age.

This updated plan provides an opportunity to develop a continuum of accessible, quality care for children and youth birth to age 13 by recognizing the various needs for different ages of students.

Thank you for the important updates in this new plan and for your consideration of the recommendations in the above.

Sincerely,



Jodi Grant  
Executive Director

