

ATTN: Mary B. Jones

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

RE: Proposed Information Collection Activity; Child Care and Development Fund Plan Preprint for States/Territories for FFY 2025-2027 (ACF-118) and Extension of Child Care and Development Fund Plan Preprint for States/Territories for FFY 2022-2024 (OMB #0970-0114);

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FROM: Afterschool Alliance

DATE: August 25th, 2023

Dear Administration for Children and Families,

The Afterschool Alliance applauds the work of drafting the CCDF 2025-2027 Pre-Print. The Afterschool Alliance is a non-profit organization working with over 25,000 programs, 50 Statewide Afterschool Networks, and national, state and local public and private providers and intermediaries to ensure access to afterschool and summer opportunities to all youth and support parents and communities.

The needs of working parents and parents in school or training for school-age before school, afterschool, and summer care are well documented. School-age children, ages 5-13, constitute almost half (45%) of all children and youth served with CCDF funds. This includes children served in home-based settings, mixed age center-based care, and school-age only settings including at times the same public school buildings that serve students during the in-school hours.

We appreciate the careful attention throughout the draft pre-print to prompt states to detail how the school-age population and school-age providers are being considered and supported by the state as it makes its child care investments through the CCDF program. We know this attention enables more providers to be able to offer access to CCDF supported care. Importantly, this means more families will have a selection of available, high quality opportunities for their children's development and continued growth as the children age from early care into the school-system. We also commend the general thoughtfulness around attention to special and high need populations, program sustainability and staff supports, and parent affordability and ease of use for all children and youth.

While we have a number of smaller comments on the positive language that we believe will support school-age youth in the pre-print plan and a few suggestions for making the plan stronger, ***we have three key areas we want to emphasize.***

1. Documented meaningful engagement with statewide afterschool networks
2. Investments in quality for the large population of school-age children served with CCDF funds
3. Understanding the landscape of license-exemptions within a state

In regards to meaningful engagement, in order to truly build access and quality, leverage resources, and sustain the field; leaders, policy makers and practitioners must share space and create a cohesive vision. School-age stakeholders from afterschool networks and affiliates, to providers to parents with school-age children, and the youth themselves, must be a part of the on-going planning and implementation process. ***The Office of Child Care can support this engagement, in part, by asking states to document at***

least one instance of consultation with statewide afterschool networks or affiliates during the planning process including documentation of the time, place, and people (with titles) engaged in consultation.

Additionally, we hope this state planning cycle will include **attention to school-age quality investments**. School-age workforce challenges have paralleled those in the early care space, and job quality, professional development opportunities and workforce supports are critical to sustaining high quality slots, reducing waitlists, and attracting and retaining staff. Appropriate school-age professional development not only directly supports school-age students still struggling with learning loss, mental health challenges and social disconnection from the pandemic, and overall program quality, but also allows staff to develop their own careers along a ladder supplemented by investments in their education and salary. States must invest 3% of their CCDF in infant and toddler care, and an additional 9% in general quality investments. However, given that 45% of those served are school-age, we emphasize that plans should support opportunities for states to show and speak to thoughtful investments in school-age quality. In states that don't offer or recognize many school-age specific trainings, programs are often left outside quality and continuous improvement systems and staff are left aside from the opportunities to obtain credentials or other benefits along their career pathway. Where possible, investments in school-age quality such as staff training and professional development should be provided by organizations and trainers with expertise in school-age child and youth development.

As a final overarching thought, we ask that you consider having states include a data point **specifying the percentage of their CCDF eligible programs that are license exempt, including specifically what percentage of school-age only programs are license exempt programs**. This question could be an add on to section 5.1.2. We support many of the questions in the pre-print which recognize the need to ask if license exempt programs might be included in, for example, state consumer education databases, training and professional development opportunities, or quality systems. However, this information would be more impactful with an understanding of how many programs that policy might impact. For example, if none of a states school-age only programs are license exempt, then not having a policy for quality for license exempt providers is less of a concern. However, if 80% of their school-age only programs operate as license exempt then exclusion from the consumer education database or quality system would be good to be aware of.

As to other comments on specific sections within the pre-print, we want to specifically highlight and commend a number of key areas for school-age support:

- Sec 1.3.2 with attention to the public hearing process and how information from the process is incorporated into the state plans
- Sec 1.4.1 on required coordination with statewide afterschool networks including on areas such as smoothing transitions for children as they age into school and the quality of programs through school age
- Sec 2.1.1 asking whether the lead agency accepts applications at local community based locations
- Sec 2.3.4 ensuring that states explain on their consumer education website why some programs may be exempt from licensing. A number of states do not have school-age specific licensing regulations, including for state defined CCDF- eligible programs operating in school-buildings. The programs, which must meet the appropriate health and safety standards, as well as often a

number of other staffing, training and quality criteria, operate as license-exempt but families should be able to understand through the state's description on their website that the designation is not an indicator of low quality or lack of guardrails. We additionally hope that states making use of school-age standards as specified in sec 2.3.6 (vi) will use those as an additional support to families searching for quality programs in the database.

- Sec 2.4.3 Ensuring the lead agency provides information on best practices in youth development including healthy eating, physical activity, mental health, positive behavior management, and parent engagement
- Sec 3.1.6 Requiring a focus on continuity of care for the child including as they transition to pre-kindergarten or school-age care
- Sec 4.1.3 noting any availability of grants and contracts for providers, including (iii) school-age children
- Sec 4.1.7 focusing on strategies for children in underserved areas and other populations and including program level strategies as well as the adding of a section of any strategies employed at the child care staff member level
- Sec 4.2.6 Ensuring that state Narrow Cost Analysis account for the age of the child and the quality of care, including allowability for additional quality indicators such as school-age quality standards.
- Sec 4.4.3 Asking states to consider whether their current payment practices facilitate provider participation.
- Sec 5.2.3 (a) Allowing states in describing teacher qualifications for center based licensed care to discuss variations based on the ages of children in care. For example, a teacher in front of 9 year-olds in an afterschool or summer camp program may wield a different set of education and experience than an early childhood education degree or CDA and still be fully qualified.
- Sec 5.3 Reiterating the regulation that health and safety trainings must be appropriate to the provider setting and age of the children served and allowing for variations in all policies based on the ages of children in care. School-age only providers may benefit more from mental health first aid than safe sleep practices. They may use school buses rather than child restraint care seats, so these variations are critical to meeting the needs of providers and the populations they serve.
- Sec 5.4.12 Ensuring lead agencies describe how their training addresses child development principals including major domains of cognitive, social, emotional, physical development and approaches to learning and how training can vary (c) based on the age of the children in care.
- Sec 5.6.14 Emphasizing the importance of timely background checks not to exceed 45 days and to be completed as expeditiously as possible, including sections discussing how states manage the costs of the background checks (5.6.16) and how states coordinate on inter-state requests (5.6.18)
- Sec 6.0 Establishing state frameworks for training and professional development and specifically ensuring this work "includes those working in school-age programs", and those working across the entire age span (Sec 6.2) "from birth through age 12".
- Sec 6.2.5 Asking states to describe professional development including any specialized training and credentials for providers who care for school-age children.
- Sec 6.3.1 (a) Inserting a chart for states to identify their training topics and source of funds including for licensed and licensed exempt programs, with a specific category (ix) for supporting the positive development of school-age children. And (b) identifying how the state connects

providers with resources to pursue post-secondary education including areas relevant to the school-age workforce.

- Sec 6.4.1 Allowing at the option of the learning and developmental guidelines for out of school-time, and providing an opportunity (d) for the state to discuss the process for the adoption, implementation and continued improvement of state out of school time standards.
- Sec. 7.3.4 Enabling the state quality system to have reciprocity for programs that meet all or part of the State/Territory school-age quality standards (d)
- Sec 7.8.1 Asking if accreditation support is available to school-age programs
- Sec 7.9.1 Providing space for the state to describe state or local efforts on developing or adopting (c) program standards for school-age children
- Sec 7.11 Allowing the state to discuss any plans for policy changes or program improvement to improve quality over the next 3 years of the new planning cycle

We would encourage:

- Sec 4.2.2 Any market rate surveys or alternative cost estimation models to include consultation with school-age providers especially in order to appropriately estimate the different costs by the age of the child as required in 4.2.4, including, where applicable, costs for higher school-age quality programming (4.2.5, 4.2.6).
- Sec 5.1.1 Recognition that Center Based Child Care may include a number of subsets of ages and settings and asking states to generally “summarize the licensing requirements” may result in them only listing one set. For example some states have stand alone school-age licensing. It might be helpful to explicitly ask which states those are in this data.
 - Recommendation: Ask – Does your state have more than one set of regulations for center based licensing, for example stand along licensing for out-of-school time/afterschool/school-age care programs? Please share the link here.
 - Recommendation: Ask – Does your state have specific licensing policies for programs operating inside school-buildings that the students are already using during the school day?
- Sec 5.1.2 A number of states do still exempt school-age only providers from licensing but may be considering specific licensing standards that meet the needs of program providers serving this age group
 - Recommendation: Ask – Does you state have any plans over the next three years to develop center based licensing specific to programs serving school-age children and youth?
- Sec 5.5.6 addresses an important concern that the state has licensing inspectors sufficient to conduct effective inspections on a timely basis. One concern is that not all inspectors are accustomed to school-age only provider settings which can create a concern about the effectiveness of their visits.
 - Recommendation: Ask states to discuss not just the ratio of inspectors to providers (a) but also how providers are trained for or specialized across the variety of settings used by the families accessing CCDF program funds.
- Sec 6.1.1 which follows section 6.0 ensuring that any framework descriptions include plans for school age providers involves consultation with the States Advisory Council on Early Childhood

Education and Care around professional standards and competencies, career pathways, advisory structures, articulation, workforce information and financing.

- o Recommendation: Ensure representation of Statewide Afterschool Networks or other representatives in the school-age community are part of the consultation process. The afterschool workforce has struggled in the recovery from the pandemic¹. This section will be critical to sustaining the workforce needed for the 45% of CCDF children served in school-age settings.
- Sec 7.0 given the 3 percent mandatory infant and toddler quality set aside, reporting measures could support understanding around how much of the additional 9 percent goes to other populations such as pre-k and school-age provider supports. Spending on school-age quality used to be an explicit category before the 2014 reauthorization, unfortunately now there does not seem to be a transparent way of understanding if any percent of quality investments at all are directed to the 45% of school-age children being served.
- Sec 7.3.2 on understanding which programs participate in the state's QRIS system, we greatly appreciate seeing an entry for programs serving school-age children.
 - o Recommendation: Slightly change the language to programs serving "school-age children only". There are a number of providers who may mainly serve younger children but accept school-age children as well who might be part of the QRIS system because of the younger children served even if the QRIS system is not designed to recognize school-age specific quality. It would be important to differentiate this type of participant from a quality system that specifically has standards and supports for school-age settings.
- Sec 7.3.6 identifying supports available to both licensed and license exempt programs will be extremely helpful given the status of school-age programs in many states as being license exempt.
 - o Recommendation: If possible, it might be of interest to interpreting the plans to understand the landscape of license and license exempt programs in the state by explicitly asking, what percentage of your CCDF eligible school-age programs are: (a) licensed (b) license-exempt

The Afterschool Alliance is grateful for all the work done by the Office of Child Care to make this plan inclusive and move the field forward toward a more connected, continuous, sustainable system for all involved. School-age children represent our toddlers and infants one step further along in their development. We appreciate the ability to continue to advocate and care for them and their families at this stage in their developmental trajectories. Please view us as a resource and partner in this work.

¹ <http://www.afterschoolalliance.org/Afterschool-in-the-Time-of-COVID-19-Surveys.cfm>