



December 2, 2019

Office of Child Care
Attention: Request for Information
330 C Street SW
Washington, DC 20201

Submitted via online portal: <https://www.regulations.gov>

Re: Comments on Improving Access to High-Quality, Affordable Child Care, Docket Number ACF-2019-0005

Dear Assistant Secretary Johnson,

The First Five Years Fund (FFYF) appreciates this opportunity to provide comments on an issue at the core of our mission: ensuring all children from birth through age five have equal access to affordable, comprehensive, high-quality care and education to support their healthy development and help them achieve their full potential in school and life. Every year, the array of federal early learning and care programs benefit millions of low-income children. These programs not only improve children's opportunities for a better future, but also support their parents' ability to work and be successful. Though the programs have unique purposes and serve families in different settings, together, they support an effective mixed-delivery system that prioritizes parental choice and children's individual needs. Further, states' own early learning structures have grown up around these programs. Nonetheless, only a fraction of eligible children receive services, and access to affordable high-quality child care still remains a barrier for many parents who wish to enter and remain in the workforce.

With these limitations in mind, we commend the Administration for Children and Families (ACF) for seeking out an honest assessment of child care in the U.S. and for your willingness to engage with stakeholders. We would recommend that any and all reform efforts build upon the strengths of existing programs. Additionally, as we move toward the common goal of addressing the affordability and access crisis without compromising quality, we call for more robust funding to enable providers to meet and exceed standards. Finally, many promising practices have been developed in response to local needs, and more solutions may be uncovered through the review and operation of existing programs. In this letter, we seek to highlight a few of these opportunities for your consideration among the many others commenters will raise.

I. Reforms Should Build on Existing Programs – Question (B)(1)

A. A 2017 Report Found Multiple Early Learning Programs Maximize Effectiveness

The request for information highlights the major sources of U.S. early care and education funding and asks how existing resources could be used more effectively to align and strengthen the delivery of early learning and care. These dollars and the programs they support grew over time

in response to the diverse needs of children and families. A 2017 Government Accountability Office (GAO) report¹ reviewed the field of early learning and care programs and addressed the efficacy and intentional targeting of the federal mixed-delivery system. Noting that families have multiple needs that may require more than one type of service, the report highlights the importance of the varied approaches and how coordination of these programs can expand their reach. For example, the two largest programs, Head Start and the Child Care Development Fund (CCDF), were created with different goals in mind: Head Start is focused on supporting children's early development by offering comprehensive, community-based services, while CCDF subsidies were created to support parents' involvement in the workforce. Families can use both, however, to ensure full-day, year round access to affordable, high-quality care. These targeted programs are essential components to an effective mixed-delivery system that places high importance on parental choice and providing developmentally-appropriate education and care that addresses children's individual needs. The report also confirmed that agency coordination has mitigated the possible negative effects of fragmentation and overlap.

Further, these programs create a robust foundation upon which states can build their own child care systems, allowing them to leverage federal funding to create and expand high-quality early learning and care opportunities beyond what is possible with state funding alone. Increased appropriations for these programs in recent years—including historic increases in Child Care and Development Block Grant (CCDBG) funding—have only served to extend their reach. Consequently, we recommend that future reform efforts should be built upon existing programs, meeting states and localities where they are. Standards for quality should remain high, but sufficient supports should also be in place to offer providers opportunities for continuous improvement.

B. Federal Programs Help Spur Innovation in States, Generate Ideas for Reform, and Capitalize on Existing Resources

Among the range of existing federal programs, two are already helping states to innovate and meet local needs by capitalizing on existing resources: the Preschool Development Grant Birth through Five (PDG B-5) program and Early Head Start – Child Care Partnerships (EHS-CCP). PDG B-5 builds on federal, state, and local early care and learning investments by giving states a unique opportunity to inventory the availability and quality of their programs, while thinking strategically about how to optimize funding streams. As the grant moves into the implementation phase, FFYF is optimistic about the potential for reducing fragmentation and overlap, streamlining administration, and shifting resources to where they are most needed. Congress has shown bipartisan support and attention to PDG B-5 from conception to implementation and most recently in the United States House of Representatives by increasing funding in Fiscal Year 2020. Governors across the country have also applauded PDG B-5 for the way it supports state investments and initiatives as they consider how to best improve coordination, quality, and delivery of services.

Likewise, EHS-CCP seeks to maximize federal funding by partnering Early Head Start grantees with providers that serve low-income children receiving CCDF subsidies. Head Start is a model for providing affordable, comprehensive, high-quality care and education, and the Head Start Performance Standards (HSPS) represent best practices in the field. EHS-CCP extends the same

¹ Government Accountability Office Report to the Chairwoman, Committee on Education and the Workforce, House of Representatives, *Early Learning and Child Care: Agencies Have Helped Address Fragmentation and Overlap Through Improved Coordination*, July 2017, (<https://www.gao.gov/assets/690/685775.pdf>)

quality of care into the array of in-home and center-based care options as grantees assist their child care partners in meeting the HSPS and integrating comprehensive services and resources into more traditional settings. In addition to improving overall quality of care, providers can use EHS-CCP funds to pay for supplies, equipment, and facilities improvements; improve compensation, professional development, and training for child care staff; and reduce class sizes and adult to child ratios. In this way, EHS-CCP’s innovative and efficient approach of layering EHS-CCP and child care subsidy funds has been shown to improve the quality of care across communities, benefitting all children in the care of participating providers—not just those receiving subsidies—while also expanding access to these essential services for low-income children.

II. Opportunities to Leverage Success

A. Using Existing Programs to Identify Solutions

While PDG B-5 and EHS-CCP seek to optimize state and federal investments, there is still room for improvement. The initial PDG B-5 grantees will provide 46 unique perspectives and strategic plans to improve overall quality of care. Additionally, this information gathering process will provide the insight and expertise of a range of stakeholders. ACF should use these diverse and wide-ranging ideas to inform their approach moving forward, highlighting solutions that can be held out as models of best practice, while identifying areas where federal action is needed to bridge gaps.

B. Using Local Innovations as a Road Map

The request for information singled out several issues essential to resolving the crisis of access and affordability. As a federally-focused organization, FFYF is always looking at how successful solutions identified at the state and local levels can be leveraged across the country. Based on our work, below are just a few examples of programs that could be used to confront these issues.

i. Cultivating the Child Care Workforce – Question (A)(3)(a)

Early Childhood Education (ECE) registered apprenticeships have demonstrated significant potential for cultivating the child care workforce on a national level. FFYF strongly supports expanding the apprenticeship model into early childhood, providing “earn as you learn” opportunities to individuals who need a credential or degree to advance in their careers, while also allowing providers to improve the quality and effectiveness of their staff. At least eight states currently offer an ECE registered apprenticeship program,² and drawing on their examples, states could use similar programs to both recruit and retain early childhood educators.

ii. Building the Supply of Child Care in Underserved Areas and Improving Business Practices – Questions (A)(1)(b) and (A)(4)(a)

ECE apprenticeships could also serve to build the supply of high quality, affordable child care in underserved areas and to improve business practices and development. Further, recognizing that finances are often a primary barrier to entering and remaining in the market, grants or low- or no-interest loans to providers could be used to address both of these issues. Individuals could use

² Alison Lutton, District 1199C Training & Upgrading Fund, *Apprenticeship as a Degree Attainment Strategy for the Early Childhood Workforce*, September 2018, (https://www.1199ctraining.org/docs/allisonlutton_apprenticeshipwhitepaper_formatted090418.pdf)

these funds to obtain education or training, including training on how to manage a child care program; acquire or improve facilities; purchase supplies; and cover other start-up costs. Priority for such funding could be determined by local need, including priority to providers offering care for infants and toddlers, for children with disabilities, and during non-traditional hours.

EHS-CCP is another excellent strategy to increase the supply of high-quality providers and improve business practices and development. In addition to the benefits described above, the child care centers and family child care providers partnered with Early Head Start grantees often offer more flexible and convenient full-day, full-year services for working families and have experience providing care that is responsive to the cultural, linguistic, and social needs of families and their local communities.

iii. Shared-Services Alliances – Question (A)(4)(b)

These partnerships, as well as those that have developed outside of the EHS-CCP framework, are helping smaller providers thrive, easing the burdens that can accompany providing affordable, high-quality care. The organization All Our Kin is a great example; they work to train, support, and sustain community child care providers, including numerous family child care providers, through a network of centralized resources. Family child care is often a more affordable option, however, the small number of employees can make it difficult to ensure they have the technical resources they need. The network of resources All Our Kin offers helps child care professionals to succeed as business owners, while also giving additional resources to ensure program quality and support children's healthy development.

III. Sustained and Supplementary Funding is Necessary to Extend the Reach of Programs and Ensure the Success of Proposed Reforms

The 2014 bipartisan reauthorization of the CCDBG Act made significant changes to improve the overall quality of care available and to make it easier for parents to find and maintain high-quality care. Meeting these important new quality and safety standards, however, requires investment in provider and state-level systems capacity to deliver, support, and oversee quality programs that promote children's development and learning, as well as to cover the costs of quality programs. Additionally, around the time these changes were enacted, only 15 percent of all children estimated to be eligible under federal rules received CCDF subsidies.³

As mentioned above, Congress has made significant and historic investments in CCDBG in recent years. Nonetheless, these increases are only a first step toward providing long-needed funds to develop essential infrastructure and expand access to subsidies. Increased funding for child care would make a critical difference in ensuring children from low-income families are ready for school and success in college, career, and life. As states continue to implement the 2014 quality improvements, as well as any reforms that might arise from ACF's current effort to expand child care access, sustained and supplementary funding is essential to ensuring these reforms have the desired effect.

³ Nina Chien, Office of the Assistant Secretary for Planning and Evaluation, U.S. Department of Health and Human Services, *Factsheet: Estimates of Child Care Eligibility and Receipt for Fiscal Year 2015*, January 2019 (<https://aspe.hhs.gov/system/files/pdf/260361/CY2015ChildCareSubsidyEligibility.pdf>)

IV. Conclusion

This is a time of unprecedented effort by federal, state, and local leaders and lawmakers to ensure that more families have access to early learning opportunities. Given the widespread investment of new funds for this purpose, the request for information asks whether the current system is the right foundation upon which to build. FFYF would argue that it is, although there are numerous areas for improvement if we are to meet the needs of children and families across the country. The 2017 GAO report confirms these programs are complimentary, and states have developed their own solutions to local issues around them. Additionally, PDG B-5 gives states an opportunity to survey these sources of funding and how they're being used and to develop a strategic plan to address gaps in services. In these strategic plans and in any federal reform efforts, we strongly urge ACF to be uncompromising in quality standards, but at the same time, ensure that providers of all kinds have the resources they need to be successful.

Again, we applaud ACF for seeking out an honest assessment of child care in the U.S. and for your consideration of these comments as we move toward the common goal of addressing the affordability and access crisis without compromising quality. If you have any questions or if we can provide any additional information or examples, please do not hesitate to reach out.

Sincerely,

A handwritten signature in blue ink, appearing to read 'SR', is positioned above the typed name.

Sarah Rittling
Executive Director
First Five Years Fund