

# Response to Public Comments on Proposed 2014-15 State Plan for the Child Care and Development Fund (CCDF)

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June 28, 2013

**NOTE: Pending legislation, the Child Care Division (CCD) will become the Office of Child Care within the Oregon Department of Education's Early Learning Division as of July 1.**

## Background

The CCDF State Plan is a biennial document that answers pre-programmed questions about how and to what end federal CCDF block grant funds will be used in Oregon. The state plan team carried into plan development work what they learned from conversations held during CCD's regular stakeholder venues. These venues include teams associated with QRIS, Race to the Top and the Child Care and Education Coordinating Council. CCD posted the proposed plan on April 24<sup>th</sup> inviting further public comment by May 30<sup>th</sup>. In addition, two public hearings were held on June 5<sup>th</sup> and June 12<sup>th</sup>. The state plan was due to the federal Office of Child Care by June 30<sup>th</sup>.

CCD appreciates the comments (and corrections!) and commits to adjusting its practices to address as many of the issues raised as possible, and to provide a regular venue to address emerging stakeholder issues in the future.

This document summarizes the comments and CCD's response.

## Themes and Responses

### **Theme 1: Stakeholder engagement and understanding of the plan is inadequate.**

CCD agrees. To enhance information sharing and learning around CCDF, the state plan, and Oregon's Early Learning System, CCD will expand stakeholder engagement and education by adding a regular CCDF agenda item on the Child Care and Education Coordinating Council monthly agenda.

CCD will assist in preparing CCDF educational materials for legislators, the Early Learning Council and other policy makers.

CCD also agrees that parent engagement needs to be enhanced and will explore with stakeholders ways to engage parents in policy conversations.

## **Theme 2: Allocation of dollars for child care subsidy and quality work is confusing.**

CCD agrees. By design, the CCDF State Plan is not a budget document, so confusion is understandable. This response addresses numerous comments and questions regarding use of Targeted Funds for infant/toddler, school-age/CCR&R and quality expansion.

These Targeted Funds are invested in the subsidy program, regulation/monitoring of licensed facilities, and child care resource and referral services.

States are required to spend at least 70 percent of their aggregate Matching and Mandatory funds, plus a substantial portion of their Discretionary allocation on subsidies for low-income working families. Oregon spends 95 percent of the Matching/Mandatory allocation and approximately 34 percent of the total Discretionary allocation on subsidies, which includes Targeted Funds for infant/toddler and school-age care.

The infant/toddler and some school-age/CCR&R Targeted Funds are used for Enhanced Subsidy Rates, which Department of Human Services listed providers can access by attending health and safety training and improving the quality of child care environments.

## **Theme 3: How the needs of license-exempt home and relative care (formerly called FFN care) are addressed is inadequate and unclear.**

Many of the comments contributing to this theme will be addressed through stakeholder education about the federal block grant program during the standing CCDF agenda item at Coordinating Council (CCECC) meetings and Subsidy Coordination subcommittee meetings.

The proposed federal rules on enhancing the quality of license-exempt care will require significant policy shifts and increased resources to implement in Oregon. These rules, once finalized, will become effective in October of 2015. Scope and implementation will be a major part of CCECC stakeholder conversations.

## **Theme 4: A common language is lacking.**

CCD agrees. By definition, the flexibility associated with federal block grants encourages states to develop their own approaches, the by-product of which can be confusing federal-state language. For example, federal terms such as “Matching, Mandatory and Discretionary” funds have specific legal meanings that are different than generally used in Oregon (and elsewhere). Another example is the fact that federal categories for types of child care are defined differently than those in Oregon, meaning the definitions and categories overlap in a confusing way.

Common language is another area that can and will be addressed during the standing CCDF agenda item at Coordinating Council (CCECC) meetings.

## **Theme 5: School-age programs are inadequately addressed.**

CCD agrees and has modified the plan to reflect this to the degree possible at the present time. Integrating school-age information was not possible in some areas. For example, the federal plan template does not provide a way to enter required teacher-child ratios for school-age programs.

There will be opportunities for learning dialogues around school-age programs and policies during the standing CCDF agenda item at Coordinating Council (CCECC) meetings.

## **Theme 6: Other policy issues should be more proactively addressed.**

- Coordination of services (HUBs)
- Equity lens
- Emergency preparedness

These and other emerging issues will be the topic of learning dialogues at the standing CCDF agenda item at Coordinating Council (CCECC) meetings.