



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

RE: Comments on Improving Access to Affordable, High Quality Child Care Request for Information  
Docket No.: HHS-ACF-2019-0005  
RIN 0970-ZA15

Dear Mr. Williams,

Thank you for the opportunity to submit comments on the Department of Health and Human Services' (HHS) Request for Information as published in the Federal Register on October 2, 2019. The Early & Elementary Education Policy team at New America conducts research, develops policy recommendations, and disperses new ideas to policymakers and broader audiences to improve access, quality, and alignment in early education programs for all children from birth through third grade. Our team is dedicated to helping policymakers develop an early education system that serves all children, with particular attention to children from disadvantaged families.

We appreciate the Department's goals to improve access to affordable, high quality child care. High-quality early learning in the first eight years, from birth through third grade, build the critical foundation of cognitive, social, and emotional skills on which all future learning rests. Despite its importance, high-quality early learning opportunities are out of reach for many families. As mentioned in the Request for Information, "The average cost of center-based infant child care in 28 states is more than college tuition." Child care is prohibitively expensive and the burden cannot continue to fall on families and providers.

First and foremost, greater financial investment is needed to improve access and quality. The solution to America's child care crisis does not rest in reducing regulations; it is in greater investment. Many of the CCDBG regulations are essential to ensuring that programs meet basic health and safety standards. Regulations, such as ratios, class sizes, and teacher qualifications are essential for the health and safety of children in care and for ensuring the learning experiences are high-quality. When regulations at different levels (federal, state, or local) or for different federal programs contradict themselves or do not meet a common sense standard, then they

should be reviewed. But this act alone will not meet the goals of the Administration to improve access to high-quality care.

Per the instructions in the *Federal Register*, below we identify the question to which we are responding by indicating the corresponding letter and number(s).

***A. Improving Access to Affordable, High Quality Child Care***

***1. Building Supply of Child Care. b. Successful strategies for building the supply of high quality, affordable child care in underserved areas.***

Two-Generation Programs—Two generation programs can be an effective way to increase the supply of child care directly targeting parents who are working or enrolled in school or job training. Regulations should incentivize adult education programs, workforce development programs, schools, community colleges, universities, and employers to provide on-site child care for enrolled students or employees. This has the benefit of creating opportunities for integrated, two-generation learning. Child care eligibility policy should include children of adults enrolled in programs such as adult English as a Second Language, GED, job training, or post-secondary coursework.

This two-generation strategy also has the benefit of opening up new building space for child care. An existing, licensed child care provider could run the early childhood program on-site at the adult learning facility. Another approach is for a network of family child care providers to share a central administration and have satellite locations in various places, including in the adult education facility. In the best case scenario, the space would be offered at a reduced rent rate or rent-free to the child care provider. In communities where space is limited and rent is high, finding appropriate space is a main barrier to expanding access for families.

Adequate and Predictable Funding—Reimbursement rates must be raised to a rate that covers the cost of high-quality care. And, payments to providers should be predictable so that they can create budgets, invest in quality improvement strategies, and plan for expansion. Under the current system, providers are often paid via reimbursement after services have been provided and based on attendance (which fluctuates). Instead, regulation should encourage payment to providers up front, quarterly with an agreement that they will maintain a minimum threshold of enrollment. When providers are able to budget, they can plan for expansion. When providers have a steady and predictable income and a favorable debt-to-income ratio, they will be better situated to receive loans necessary for expanding their businesses.

## **2. Improving Child Care Regulations.**

- a. Ways to ensure that regulatory and monitoring practices are not duplicative, inconsistent, and/or unintentionally driving up the cost of providing care, reducing availability, or pushing different types of providers, such as faith-based or home-based family child care providers, out of the market.***

Licensing and Zoning Ideas to Support Family Child Care—The Administration and state and local decision makers should take special consideration for the operating needs of family child care providers (FCC). We recommend reviewing the report, “Creating the Conditions for Family Child Care to Thrive: Strategies for Increasing the Supply, Quality, and Sustainability of Family Child Care in States and Communities” published in October 2019 by All Our Kin.<sup>1</sup> They provide thoughtful recommendations about licensing and zoning among other important topics.

Encourage Regulators to Get Community Input—Providers themselves are best positioned to identify the barriers to their success. As part of future state CCDF plans, ACF could ask states to describe how they will engage FCC in a process of identifying regulatory or monitoring practices that are “duplicative, inconsistent, and/or unintentionally driving up the cost of providing care, reducing availability, or pushing different types of providers” out.

### ***b. How monitoring for compliance could be used to support providers in their pursuit of providing high quality care.***

The monitoring function should be separated from the technical assistance or quality improvement function. Compliance monitors should utilize a clear, consistent, and regulations-based tool to evaluate regulatory compliance. Child care providers should have access to that tool prior to the monitor’s visit. Efforts should be made to create inter-rater consistency among compliance officers and subjectivity of the tool should be minimal. Compliance officers should have a manageable caseload. Policymakers also need to be thoughtful about not just collecting data, but how they share the results. Child care providers should be trained on what to do with the results.

## **3. Cultivating the Child Care Workforce.**

- a. ACF seeks public comment on what competency-based, short-term training models, apprenticeships, and stackable credentialing support (i) recruitment and (ii) professional development of early childhood educators.***

Apprenticeships—The following is excerpted from New America’s policy brief “Earning While Learning with Early Educator Apprenticeship Programs” written by Emily Workman and published in February 2019.

Registered Apprenticeships, an age-old model in many industries, particularly outside of the United States, offer students on-the-job learning and coursework aligned with the knowledge and competencies required to be fully proficient employees. Through Registered Apprenticeships, participants are employees receiving paid, specialized on-the-job training with ongoing mentorship as well as classroom-based, related technical instruction that can result in college credit. All Registered Apprenticeship programs culminate in a nationally recognized credential, while in degree apprenticeship<sup>2</sup> models participants also receive an associate degree, or in some cases, a bachelor’s degree following completion. Apprentices are given time off to attend classes with contextualized coursework that applies directly to the job. Wage increases are provided as participants meet benchmarks for skill attainment and, upon completion, they receive a certificate of completion from the U.S Department of Labor’s Office of Apprenticeship. Most Registered Apprenticeships last two to three years and include about 2,000 hours of on-the-job training and a minimum of 144 hours of classroom-based instruction each year.

The college credit, certificate, or degree an apprentice can earn varies from state to state. In Kansas, apprentices are required to obtain a total of 20 hours of course credits, the first 10 of which culminate in a Child Development Associate (CDA). In Pennsylvania, apprentices, required to obtain a CDA prior to enrolling in the Registered Apprenticeship program, complete the program with an associate degree designed to articulate into an early childhood bachelor’s degree.<sup>3</sup> A Los Angeles-based program led by the SEIU National Training Center offers three educational pathways culminating in the teacher assistant with associate degree permit, associate degree in child development, or the bachelor’s degree in early childhood studies, depending on whether the apprentice enters the program with prior higher education coursework.<sup>4</sup> A West Virginia program links its Registered Apprenticeship program with a pre-apprenticeship program operating in high schools where much of the course credit can be earned prior to graduation.<sup>5</sup> To ensure students are prepared for college-level coursework, the Pennsylvania program offers a remedial or contextualized bridge course followed by a college placement preparation course. Throughout the program, apprentices are provided academic advising, tutoring, and study groups.

Pre-apprenticeships can be an effective tool for recruiting the next generation of early childhood educators and are designed to prepare students to enter into and succeed in a registered apprenticeship program. Students can gain specialized instruction and on-the-job training in early childhood education while pursuing a high school diploma or GED. Pre-apprenticeships are involved in a formal partnership with a registered apprenticeship program, allowing apprentices to receive credit towards the completion of the registered apprenticeship following graduation.

Apprenticeship would be most beneficial when coupled with an effort to increase overall compensation for early educators. The modest increases through apprenticeship models alone do not adequately compensate early educators for the complex work they do with young children.

Grow Your Own—Grow Your Own (GYO) teacher preparation programs are a promising strategy for cultivating a racially and linguistically diverse child care workforce.<sup>6</sup> GYO programs are partnerships between educator preparation programs, school districts, and community organizations that recruit and prepare local community members (e.g., parents, paraeducators, uncertified school staff, high school students) to enter the teaching profession and teach in their communities. Since these programs are developed via partnerships, they are often designed to meet the needs of students by removing common barriers to accessing and completing a credential, including by providing scholarships, academic advising and a cohort structure and to target particular shortages areas such as bilingual education and early education.<sup>7</sup> A growing number of states are investing in GYO program development and sustainability.

Thank you for your efforts to increase access to high-quality child care for children and families. We invite you to consult the following resources for more information about these topics: “Thriving Workforce; Thriving Early Learners”;<sup>8</sup> *The Care Report*;<sup>9</sup> and *Lessons from the Bayou State: Three Reforms for Improving Teaching and Caregiving*.<sup>10</sup> Thank you for considering these comments.

Sincerely,  
New America’s Early & Elementary Education Policy Team

<sup>1</sup> Natalie Vieira and Shannon Hill, *Creating the Conditions for Family Child Care to Thrive* (New Haven, CT: All Our Kin, 2019), [http://www.allourkin.org/sites/default/files/PolicyReport-Oct2019-rev2\\_compressed%20%281%29.pdf](http://www.allourkin.org/sites/default/files/PolicyReport-Oct2019-rev2_compressed%20%281%29.pdf)

<sup>2</sup> “Degree apprenticeship may be defined as ‘an apprenticeship program that meets the standards established in the National Apprenticeship Act 29 CFR Part 29 and the requirements of a postsecondary degree program as established by the relevant state education agency in the state where the program is delivered,’” Mary Alice McCarthy, Iris Palmer, and Michael Prebil, *Eight Recommendations for Connecting Apprenticeship and Higher Education* (Washington, DC: New America, December 2017), <https://www.newamerica.org/education-policy/policy-papers/eight-recommendations-connecting-apprenticeship-and-higher-ed/>

<sup>3</sup> Amy Friedlander, *Philadelphia Early Childhood Education Apprenticeship Program: Support for the ECE Workforce and the Children They Teach* (Philadelphia, PA: The Early Childhood Action Collective), [https://1199ctraining.org/docs/ECAC\\_ApprenticeshipProgramComponents\\_friedlander052018.pdf](https://1199ctraining.org/docs/ECAC_ApprenticeshipProgramComponents_friedlander052018.pdf)

<sup>4</sup> State of California, Department of Industrial Relations, Division of Apprenticeship Standards, letter to Alexa Frankenberg, deputy director, SEIU Early Care & Education Head Start Apprenticeship Program, June 18, 2018, on approval of apprenticeship program, [https://www.dir.ca.gov/das/standards/100007\\_SEIUHeadStart.pdf](https://www.dir.ca.gov/das/standards/100007_SEIUHeadStart.pdf)

<sup>5</sup> National Center on Child Care Professional Development Systems and Workforce Initiatives, “Strategies to Strengthen the Early Childhood and School-Age Workforce: West Virginia,” [https://childcareta.acf.hhs.gov/sites/default/files/public/strengtheningworkforce\\_strategies\\_west\\_virginia.pdf](https://childcareta.acf.hhs.gov/sites/default/files/public/strengtheningworkforce_strategies_west_virginia.pdf).

<sup>6</sup> Amaya Garcia and Jenny Muñiz, “Essential Policies and Practices for Grow Your Own Programs,” <https://www.newamerica.org/education-policy/edcentral/essential-policies-and-practices-grow-your-own-programs/>

<sup>7</sup> Amaya Garcia and Roxanne Garza, *Chicago’s Bilingual Teacher Residency: A Partnership to Strengthen the Teacher Pipeline* (Washington, DC: New America, 2019), <https://www.newamerica.org/education-policy/reports/chicagos-bilingual-teacher-residency-a-partnership-to-strengthen-the-teacher-pipeline/>

<sup>8</sup> This site houses a series of articles by New America’s Early & Elementary Education Policy team to distill and elevate key research, ideas, and recommendations from “Transforming the Workforce for Children Birth Through Age 8: A Unifying Foundation.” <https://www.newamerica.org/education-policy/early-elementary-education-policy/strong-early-childhood-workforce-strong-early-learners/>

<sup>9</sup> Brigid Schulte and Aliza Durana, *The New America Care Report* (Washington, DC: New America, 2016), <https://www.newamerica.org/better-life-lab/policy-papers/new-america-care-report/>

<sup>10</sup> Abbie Lieberman, *Lessons from the Bayou State Three Reforms for Improving Teaching and Caregiving* (Washington, DC: New America, 2019), <https://www.newamerica.org/education-policy/reports/lessons-louisianas-early-childhood-system/>