



May 21, 2018

State Plan Public Hearing Coordinator
Early Education and Support Division
California Department of Education
1430 N Street, Suite 3410
Sacramento, CA 95814

**COMMENTS REGARDING THE CHILD CARE AND DEVELOPMENT FUND (CCDF) PLAN
FY 2019-2021**

Dear State Plan Public Hearing Coordinator,

On behalf of First 5, we thank you for the opportunity to provide comments on the California Department of Education's (CDE) Child Care and Development Fund (CCDF) State Plan for FY 2019-2021. First 5s across California play a foundational role promoting local efforts to improve the availability, affordability and quality of early learning, and we are excited by the opportunity CCDF implementation provides to support these efforts across California.

Our recommendations encourage the CDE to prioritize key investment areas, enhance the infrastructure of the state's largest quality improvement effort - Quality Counts California (formerly California Quality Rating and Improvement System), and allow for more local flexibility to ensure locally driven priorities can be maximized. California's CCDF plan should be a multi-year plan that is both strategic and holistic. For the past several years, local Quality Counts California and Quality Improvement Systems (QIS) consortia have expanded and coordinated quality efforts throughout the early learning field. In alignment with these efforts, we believe the CCDF plan should assess and prioritize all scarce resources in our growing state and local quality systems to increase capacity and build upon existing infrastructure.

In an effort to use limited dollars effectively and build upon the existing Quality Counts California/QRIS infrastructure found across all 58 counties in CA, First 5 makes the following recommendations to better align quality improvement efforts:

Section 2.3 Consumer Education Website

Strengthen infrastructure to support quality and efficiency

We strongly support continued efforts to strengthen the infrastructure to support quality and efficiency through the creation of a statewide database and online portal that not only connects existing early care

and education data but provides an opportunity for better consumer accessibility to information about California's existing early care system.

Recognizing the tremendous local efforts to build the infrastructure necessary to provide this information, CDE must coordinate and build upon existing efforts in order to avoid duplication, best use limited resources, and consider key lessons learned.

Section 5.3 Monitoring and Enforcement Policies and Practices for CCDF Providers

Compliance to the CCDF annual visits requirement

We recommend leveraging current inspections by CDE, local Quality Improvement (QI) consortium, DSS and other approved groups as meeting the annual inspection requirement of licensed child care facilities who receive CCDF assistance. We believe this is a prudent approach to coordinate and streamline inspections that are already occurring and will reduce the number of required visits.

In addition, we recommend the development and execution of an interagency agreement between Department of Social Services (DSS) and CDE to create procedures for identifying major health and safety violations and a process to immediately report to DSS when major health and safety violations are identified.

R&R license-exempt visiting pilot

We are supportive of the proposed license-exempt monitoring pilot to determine how to most effectively monitor license-exempt providers. License-exempt care plays a critical role in the early care and education system to meet the unique needs of families, whether to accommodate a parent's non-traditional work schedule or a parent's preference to have a relative or other close acquaintance care for his or her children.

We support the CDE's intent to differentiate the annual inspection of unlicensed care that is most appropriate to, and most supportive of, license-exempt providers. In addition, we recommend renaming the pilot program to "R&R license-exempt visiting pilot" to reflect that the visits are intended to be a means of support for license-exempt providers, not a punitive process.

Section 6.1 Professional Development Framework

Expanding AB 212 Programs to support training and professional development of child care workforce

We recommend significant increases in funds for AB 212 programs. In recognition of the importance of quality child care on a child's development, AB 212 has been a critical cornerstone for retaining and training our child care workforce. First 5s have made a significant investment over the last several years in training, professional development as well as coaching, and AB 212 programs have been an important resource to leverage and complement our investments.

In addition, we request embedding AB 212 programs in the state's quality improvement system. AB 212 programs should be expanded to allow Title 22 provider participation. In Los Angeles County, a contracted child care center, Family Child Care Home Education Network or a licensed provider where

51% of children receive a child care subsidy are eligible to participate in AB 212 programs. These programs should also prioritize stipends proven to benefit retention in the field, such as linking the stipends to educational attainment or to a site continuous improvement plan. The state should establish a minimum standard to define effective retention of early childhood educators and determine how best to spend AB 212 program funds based on this definition.

Section 6.2 Training and Professional Development Requirements

Supporting professional development for family child care home providers

We support the expansion of the California Child Care Initiative Project (CCIP) and would request additional one-time funds for a multi-year investment in the program. CCIP provides training for new and prospective family child care home providers, which helps build the capacity of the child care workforce providing infant/toddler care.

Section 6.3 Early Learning and Developmental Guidelines

Provide local flexibility for the child assessment system

We strongly recommend expanding local options for the child assessment system beyond exclusively offering the Desired Results Developmental Profile for both child care professionals participating and not participating in QRIS/QIS. The CDE should compile a list of acceptable child assessment and observation tools or establish parameters for an acceptable tool, and provide local flexibility that allows consortiums to pick what tool best fits their locally-driven priorities and needs.

Section 7.1 Quality Activities Needs Assessment for Child Care Services

Improving the supply and quality of child care for infants and toddlers

We support the \$4.6 million in one-time funding earmarked for quality improvement activities. In addition, we support the significant increase to the Infant/Toddler Block Grant and the renaming of the funds to Quality Counts California, which better reflects the cost of quality care for children in the state. We also support CDE's continued efforts to align and integrate quality improvement (QI) projects with local QI consortiums.

Increasing First 5 IMPACT Hubs assessor capacity

We recommend \$2.5 million in one-time funds over three years to fund regional assessor capacity in the IMPACT Hubs. Rating in the Quality Counts California system drives provider access to local QRIS block grants and services. However, rating systems are still in development and underresourced. Local First 5s, County Offices of Education and IMPACT Hubs have all highlighted the need for additional assessors to support local providers participating in the Quality Counts California system.

In addition, we request some flexibility with these funds to address local needs. We recommend these one-time dollars be allowed to pay for staff salary support for regional assessment needs, such as local assessor travel to assessor certification trainings, coaching certification, and the assessments themselves. The field has also expressed the need for geographic flexibility such as working outside county boundaries to create regionalized assessor pools.

One-time proposals for additional quality funds

With the additional \$17.162 million in one-time funds added to the quality budget in the May Revise, we suggest the following one-time proposals for the use of these funds to improve the early learning system:

- Establish an AB 212 pilot program for Title 22 providers serving subsidized children, with one-time funds spent over a five-year period;
- Support early identification practices by creating a pilot program in strong early intervention counties, for example where Help Me Grow systems have been well-established, to support child care providers in developmental screening, monitoring, and family outreach.

In closing, we appreciate your consideration of the specific recommendations outlined in this letter, and we look forward to continued public discussion to ensure California's CCDF plan supports a multi-year, comprehensive plan to prioritize scarce resources and support local, regional, and state infrastructure goals within our burgeoning QI system.

Sincerely,

First 5 Association of California, First 5 California and First 5 LA