



CHILDREN NOW



February 5, 2016

State Plan Public Hearing Coordinator
Early Education and Support Division
California Department of Education
1430 N Street, Suite 3410
Sacramento, CA 98514

Re: Draft Child Care and Development State Plan July 1, 2016 to September 30, 2018

We appreciate the role of the California Department of Education (CDE) as lead agency for administering the Child Care and Development Fund (CCDF), particularly the effort of the Department over the last year to respond to the new federal Child Care and Development Block Grant (CCDBG) requirements. We would like to take this opportunity to provide comments on the draft CCDF State Plan, as well as express our continued support for the implementation of the CCDBG provisions. While they present administrative, legislative and fiscal challenges and will likely take multiple years to address, the new rules provide a critical opportunity for California to strengthen its early care and education system and better serve its young children and families. We encourage the CDE to approach the CCDBG requirements not as a matter of compliance but as a chance for bold, visionary thinking and a vehicle to long-term meaningful reform.

We reiterate our call for the CDE, in collaboration with the Department of Social Services and other state agencies, to take a more proactive role in leading California toward implementation. While the draft State Plan gives some detail on current child care policies and practices, and in a few cases even suggests future priorities, it could go much further in providing a “road map” of guiding principles, goals and strategies that the state can aim for over time. We understand the CDE cannot mandate legislative or budgetary actions, but it can provide clear markers to guide state agencies, the field and the Legislature going forward. The CDE should also not shy away from acknowledging the cost pressures implicit in realizing all of these goals and the need for increased state and federal resources to support this effort.

Specific examples of where the CCDF State Plan could more effectively inform the state’s approach to CCDBG implementation include:

Section 2.2.7 Access to Developmental Screenings (pages 45-46)

While we appreciate the description of current efforts to expand developmental screenings in California, such as the Screening Collaborative and the inclusion of developmental screenings within the QRIS Continuum Framework, the State Plan should provide more detailed information on the proposed task/activity of establishing a statewide database or clearinghouse

for developmental screenings or referrals (page 46). Further, we urge you to refer to the recently released Information Memorandum on Developmental and Behavioral Screenings, which articulates strategies to leverage existing initiatives, and embed and integrate actions within other complimentary efforts in order to build upon existing local efforts – including QRIS and Help Me Grow – to efficiently ensure that families receive accurate, consistent information on developmental and behavioral screenings.

Section 4.4.2 Certifying Payment Rates are Sufficient (page 90)

We commend the CDE for indicating very clearly in this section that it will continue to work with advocates and Legislators to identify options for rate reform and ultimately increases in child care reimbursements. We would encourage the CDE to include more detailed data about the state's stagnant reimbursement rates, as well note the growing pressure that the minimum wage increase is posing on providers receiving both the SRR and RMR. The tasks/activities section could also lay out specific steps that will need to be taken over multiple years, including estimated percentage increases via the budget process.

Section 5.2.2 Enforcement of Licensing (pages 115- 119)

While we are pleased to see the cost estimate for annual inspections of licensed providers within this section, the CDE should clearly indicate that annual inspections continues to be a priority and include next steps for ensuring this policy change is achieved in a timely manner. Similarly, the State Plan should lay out a plan developing the state's process for monitoring license-exempt facilities. While the best route for meeting this provision has not been determined yet, there has been clear agreement within the field that the state should implement a strengths-based model for license-exempt visits and choose an entity experienced in the needs of this population, and this should be stated in the State Plan. We would also encourage the CDE to acknowledge the importance of funding these new requirements from the State General Fund, not the Quality Improvement set-aside that is used to support workforce development and quality improvement activities.

Section 6.1.1 Status of Professional Development System (pages 128)

This section indicates that the state has a fully implemented professional development framework, including providing ongoing training that is accessible for the diversity of providers and improves the quality and stability of the child care workforce. We encourage the CDE to acknowledge that while the state funds a wide array of professional development and quality improvement initiatives, the professional development system (including Early Childhood instructional programs within Institutions of Higher Education) is still under-resourced and inconsistent in addressing the needs of the current and future workforce across the state. The intent of the federal law – that states establish a clear ladder of training and professional development across the full spectrum of the workforce and improve provider stability and compensation – has not been fully met in California, and the State Plan should at the very least recommend steps to strengthen the current infrastructure.

Section 7.1.1 Overarching Goals for Quality Improvement (page 151)

We are pleased to see the CDE indicate its focus on several quality improvement goals, including supporting the statewide expansion of the California Workforce Registry and the development of the QRIS by building on the efforts of the RTT-ELC, the State Preschool QRIS Block Grant and the First 5 California IMPACT initiative. We would encourage the CDE to articulate the steps that will be needed to fulfill these goals, including securing additional funding over time to ensure the viability, effectiveness and scale of the QRIS. Additionally, this section should

acknowledge the need to develop and support pathways to quality for the license-exempt population and those licensed providers outside the QRIS. While the CDE has indicated it is waiting to confirm California's federal grant amount before releasing the quality improvement budget, it would still be beneficial for the CDE to articulate in this section its process for determining how the increasing quality improvement set-aside will be utilized and any initial priorities the CDE has identified.

In closing, we would like to suggest the CDE consider a supplemental letter to the Legislature that provides clear guidance on which CCDBG provisions will need legislative and/or budgetary action and articulates the Superintendent's recommendations for next steps. This may ameliorate the concern the CDE has expressed about approaching the CCDF State Plan pre-print as a planning tool versus a compliance report. While it is our hope that the State Plan can be modified enough to provide a road map for the Legislature, we recognize the CDE may need to consider additional ways to keep the spotlight on this critical opportunity and move the state toward meaningful action.

We thank you for the opportunity to provide public comment and look forward to continuing to working with the CDE, as well as the Legislature and other critical partners to ensure the success of California's CCDF State Plan in helping to improve the lives of our state's vulnerable children and families.

Respectfully,



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