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September 26, 2011

Administration for Children and Families
370 L'Enfant Promenade, S.W.
Washington, DC 20447

To Whom It May Concern:

On behalf of the American Public Human Services Association (APHSA) and the National Association of State Child Care Administrators (NASCCA), we respectfully submit comments in response to the *Federal Register* notice (Vol. 76, No. 144) regarding proposed changes to the Child Care Quarterly Case Record Report, also known as the ACF 801 Form. As you know, the Child Care and Development Fund (CCDF) requires states and territories to submit monthly case-level data to the Administration for Children and Families (ACF) on the children and families being served under the law's provisions.

APHSA is a nonprofit, bipartisan organization representing state and local human service professionals for more than 80 years. APHSA brings public human service administrators' perspective to Congress and the Obama Administration on issues facing the nation's low-income children and families. We serve state child care administrators representing CCDF lead agencies, providing them with support to develop, promote and implement child care and early learning policies that improve the well-being of children and the quality of child care. NASCCA members are experts in the early childhood field, managing programs serving a significant number of low-income children and families through CCDF.

Even with tough budget constraints, child care administrators have made meaningful strides to improve the overall quality of existing child care programs and their accessibility to low-income children and families. The ACF FY 2012 budget reports that in FY 2009, states spent approximately \$988 million, or 11 percent, of CCDBG funds on quality activities, which exceeded the statutory quality spending requirement. States have been using their quality set asides to improve quality rating and improvement systems (QRIS), health and safety standards for child care programs, professional development for child care providers and other initiatives that support state and local innovations focusing on quality. Through state plan submissions, the Office of Child Care (OCC) has been able to collect and release updated information on states' activities regarding quality child care and how they administer the CCDF subsidy. This information has been informing federal and state policy regarding child care. States and the public have been pleased to see increased interest in the issue.

The proposed changes to the ACF 801 Form would expand data elements that states submit to the OCC on these quality activities and the providers receiving a subsidy through the CCDF. Additional data elements include provider participation in QRIS, quality measures, accreditation status and other information. While we value and commend the efforts of ACF to improve its efforts to collect additional information on quality, states child care administrators share the following comments and feedback for consideration regarding the proposed changes to the ACF 801 Form:

Unique Provider ID

In some states, several providers are limited to the same provider number. This also applies to providers participating in QRIS. Because QRIS is location specific in many of those states, those providers are not linked to a Federal Employer Identification Number. Implementing these changes would be problematic for those states. In addition, some states do not have a single or a unique provider identifier.

The proposed changes to the ACF 801 Form also encourage states to use a unique identifier that can be linked, as appropriate, with other early care and education programs, such as Head Start, Early Head Start and Pre-K for the purposes of integrated data and service coordination. States welcome integrative and increased coordination efforts. However, the use of a specific state identification number for those programs may not apply to many states, which makes it impossible to submit this information. Providing monthly case record information on Pre-K standards may also be a challenge. State child care administrators may not have information on other early childhood programs readily available and accessible to meet the monthly data submission.

Other State-Defined Quality Measures

States appreciate the flexibility to provide information that is designed to capture provider participation in quality activities, although certain states may not have a QRIS. However, the questions included in the draft form assume that if a state has a QRIS, it is fully implemented statewide, which may not be the case in all states. For example, one of the questions regarding QRIS participation requires states to respond “yes” or “no” to clarify if providers are either eligible for or participate in QRIS. The question also asks whether or not the state has an operating QRIS. For county-administered states, QRIS participation might differ in various parts of the state. Therefore, NASCCA members ask the following question to clarify: Would the OCC count, in its collection, a part of the state where the QRIS is not operational as “not eligible”? Or could another option be added to accurately collect information regarding situations where this would apply? We recommend adding the following option: “The State has an operational QRIS, but there is no operational QRIS currently in the provider’s area.”

Range of Responses

State child care administrators believe that the range of response options for the new quality questions cover a multiple and wide variety of case scenarios. Because these questions are comprehensive and designed to capture more current information on quality activities, the OCC may want to consider including these questions in the quality section of the CCDF State Plan template. This would minimize duplication and streamline federal efforts to collect data from states. To make the process less administratively burdensome for states, this information can be collected according to the timeframe of the CCDF State Plan submissions and not on a quarterly basis as required by the ACF-801 Form. States support a more uniformed and streamline process that would minimize as much duplication as possible.

Implementation and Timeframe

Due to state budgetary cuts and limited CCDBG funds, state child care administrators would need to make significant changes to their systems to prepare for these new data submissions. For states that do not have automated systems, collecting new data from providers might be difficult to obtain in a timely manner. Those states might find it challenging to commit to the October 2013 deadline. Some states will need to conduct a cost-benefit analysis to determine potential costs to implement these changes. Many states report that the lack of additional funds to properly implement new data submissions would be a significant barrier.

Conclusion

We appreciate the opportunity to submit comments. NASCCA members recognize and agree that standardizing, tracking and collecting information on the administration of the CCDF at multiple levels

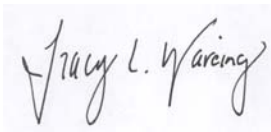
are critical, especially regarding information on quality child care. We commend the efforts of the OCC to collect this information to address the needs and service gaps of low-income children and families.

We also support efforts to ensure program integrity and accountability. Improving state automated systems can ensure accuracy in data collection. NASCCA members understand the importance of technology and the important role that it plays to improve accountability for public human service programs. Today, state automated systems can be used not only to determine eligibility, administer payments, and collect information on providers, but also to gather information on the use of quality. Some states are in the process of integrating their automated systems and making meaningful improvements to overhaul their legacy systems to improve data sets regarding child care. This is especially true for those states implementing provisions of the Affordable Care Act that apply to these activities.

Because these investments are expensive for many states during these tough economic times, we ask for a waiver for states to allow more time to properly prepare implementation of the new data elements proposed in the draft ACF 801 Form. This approach would especially assist those states with unique systems, since the block grant is designed to be flexible and allow states the ability to capture data according to the needs of the state. Some states have indicated that implementation of these changes might also require legislative action from the state legislature, a request for additional state funds to expand automated systems, guidance for counties, and adoption of procurement procedures, which often becomes a lengthy and bureaucratic process. Successfully implementing these changes on a state level might require as much as five years, which would extend beyond the October 2013 deadline. , We therefore ask the OCC for a waiver to expand the timeline to allow states more time to successfully implement these changes.

Please do not hesitate to contact Rashida Brown at (202) 682-0100 x225 or rashida.brown@aphsa.org, if you have any questions or need additional information.

Sincerely,

A handwritten signature in black ink that reads "Tracy L. Wareing". The signature is written in a cursive style and is positioned above the typed name.

Tracy L. Wareing
Executive Director
APHSA