

## Connecticut's Proposed CCDF Plan 2019-2021 Public Comments

The Connecticut Office of Early Childhood (OEC) solicited feedback and input from families, providers, and other stakeholders on the Connecticut 2019-2021 Child Care and Development Fund (CCDF) Plan. OEC provided several channels and opportunities for public feedback:

- Oral testimony at any of three public hearings
- Write-in form
- Electronically through an online submission portal

OEC received a total of 90 comments from 25 individuals across the three channels, which have been transcribed and summarized into this report. Verbatim transcripts can be found in Appendix A. The schedule of public hearings can be found in Appendix B.

The following table represents the total number of comments for each section of the draft CCDF plan.

Section Number	Total Number of Comments	Percentage
1	9	10%
2	4	4%
3	16	18%
4	14	16%
5	9	10%
6	13	14%
7	9	10%
8	0	0%
General Comments	16	18%

Amendments to Connecticut's Proposed CCDF Plan 2019-21

Section of Plan	Current Preprint Language	Amendment
6.1.1 Advisory Structure	This external Early Childhood Professional Learning Advisory Committee (EC PLAC) will provide policy recommendations to the OEC on the development and sustained efforts of the state integrated early childhood professional development system; and assist the OEC in examining the need for quality professional development that would provide opportunity for cross-role and cross-sector workforce development.	This external Early Childhood Professional Learning Advisory Committee (EC PLAC) will provide policy recommendations to the OEC on the development and sustained efforts of the state integrated early childhood professional development system; and assist the OEC in examining the need for quality professional development that would provide opportunity for cross-role and cross-sector workforce development. <b>The membership of the committee will include all provider types serving multiple age groups. The committee will focus special attention to issues related to equity and race to support educational attainment.</b>
1.4 (Institution of High Education)	The Office of Early Childhood meets quarterly with the Early Childhood Higher Education Consortia (ECHEC) comprised of representatives from all 2- and 4- year institutions of higher education, to discuss best practices and strategies to increase coordination and continuity regarding pre-service teacher preparation. The OEC is exploring opportunities to expand the eligible activities to include educational attainment through its partnership with the Connecticut State Colleges & Universities (CSCU). One pilot idea includes providing access to child care for individuals attending early childhood training programs at one of	The Office of Early Childhood meets quarterly with the Early Childhood Higher Education Consortia (ECHEC) comprised of representatives from all 2- and 4- year institutions of higher education, to discuss best practices and strategies to increase coordination and continuity regarding pre-service teacher preparation. The OEC is exploring opportunities to expand the eligible activities to include educational attainment through its partnership with the Connecticut State Colleges & Universities (CSCU). One pilot idea includes providing access to child care for individuals attending early childhood training programs at one of

Section of Plan	Current Preprint Language	Amendment
	Connecticut's community colleges. The OEC will work with CSCU to collect data on this population to assess the feasibility and scale of this pilot.	Connecticut's community colleges. The OEC will work with CSCU to collect data on this population to assess the feasibility and scale of this pilot. <b>OEC will to make stronger linkages to local Adult Education programs and support models similar to Even Start.</b>
3.4.4	No the Lead Agency does not waive family contributions/co-payments	<b>Yes, the Lead Agency waives family contributions/co-payments for other criteria established by the Lead Agency. For all families in Priority Group 1. This policy will be implemented in winter of 2019 after upgrades to the C4K eligibility are completed.</b>
4.3	Current C4K rates	<b>Use Market Rate Survey to establish rate. Rate increases will be effective December 2018.</b>
5.2.3		<b>OEC will review content in the required Online Health and Safety Orientation to better align with age groups and settings.</b>

## Comment Summaries

### **Section 1: Define CCDF Leadership and Coordination with Relevant Systems**

- Pursue additional community-based child care resource and referral systems (suggestions for <http://www.showcase.allourkin.org> and PTA) (3)
- Partnering with Adult Education programs for parents to complete GED or equivalency – as a 2 Gen approach (2)

### **Section 2: Promote Family Engagement Through Outreach and Consumer Education**

- Increase the involvement of providers and families in planning and implementation process (1)
- 2.3 Include national accreditation status in child care search results (1)
- Positive comments in support of Pilot program to reduce suspension and expulsion in pre-k (2)

### **Section 3: Provide Stable Child Care Financial Assistance to Families**

- Waive family fee for all working families whose income is below the federal poverty line (11)
- 3.1.3 Increase the eligibility threshold to compensate for minimum wage increases (2)
- Positive comment to broaden the definition of education to include parents pursuing higher education or specific job training programs (1), accelerated access (1), prioritization (1), and allowing providers to charge above co-pay (1)

### **Section 4: Ensure Equal Access to Child Care for Low-Income Children**

- Reimbursement rates should be increased (6)
- Positive comments about use of contracts (3), non-traditional hour care (2), family child care networks/shared services (1), and the need to increase capacity (1)

### **Section 5: Establish Standards and Monitoring Processes To Ensure the Health and Safety of Child Care Settings**

- Call for unified fingerprinting process, integrate with DCF and state systems. (3)
- Background check requirements for household members 18+ places an unequal burden on family care facilities (2)
- CPR, First Aid, Medical Administration classes requested in Spanish - currently paying for classes out of pocket (1)
- 5.3.5 Suggestion to document efforts to improve inter-rater reliability (1)
- 5.2.3 Training should be age-appropriate (1)
- 5.2.3 Training requirements for center-based facilities should not include CPR, First Aid, Medical Administration (1)
- 5.2.5 Request to consider Core Knowledge and Competencies for After School Providers prepared by the National After School Association [http://naaweb.org/images/pdf/NAA\\_Final\\_Print.pdf](http://naaweb.org/images/pdf/NAA_Final_Print.pdf) (1)

### **Section 6: Recruit and Retain a Qualified and Effective Child Care Workforce**

- Request for family child care providers to be represented on the Early Childhood Professional Learning Advisory Committee (2)
- Concern that family child care providers face increased challenges in higher education and training (2)
- Make training materials available in multiple languages (special mentions: First Aid, CPR, Medical administration, Spanish, Portuguese) (2)
- Need more training in caring for children with challenging behaviors (1)

- Suggestion to allow organizations to self-administer certain training that would apply toward mandatory 18 hours (e.g., camp counselors) (1)
- Concern regarding requirements for all-age training in age-specific facilities (e.g., camp counselors taking infant training) (1)
- Suggestion to offer training in a classroom setting for staff that does not have technology (1)
- 6.1.1, 6.2.1, 6.2.5 Request to consider Core Knowledge and Competencies for After School Providers prepared by the National After School Association [http://naaweb.org/images/pdf/NAA\\_Final\\_Print.pdf](http://naaweb.org/images/pdf/NAA_Final_Print.pdf) (1)
- *From comments under section 1:* Consider partnering with community colleges and adult education programs where students enrolled in Early Childhood degree programs can access care for their own children while working toward their degree [v.1] (2)

### **Section 7: Support Continuous Quality Improvement**

- Partnership and collaboration with home based and school-based programs is necessary for quality (1)
- 7.3.1 Expand the number of trainings in CPR, First Aid, and Medication in August-November to meet demand at start of school year (1)
- 7.4.1 QRIS Pilot needs additional data from licensed family child care providers before finalizing the plan (2)
- 7.4.3 QRIS should align with existing NAFCC standards (1)
- 7.5.1 Positive comment on shared services initiatives to support services for infants and toddlers (1)
- 7.9.1 Positive support for helping child care providers achieve NAFCC and NAEYC accreditation (2)
- Suggest that Connecticut work with the CT After School Network to develop a specific, state-level school age accreditation (1)

### **Section 8: Ensure Grantee Program Integrity and Accountability**

- No comments for this section

### **General Comments:**

- Give as much advance notice of public hearings as possible to ensure good attendance (1)
- Expand training and educational resources
- Include alternate language access for providers and families (4)
- Waive the 2% parent fee for low income families (1)
- Clarify funding allocations for center based versus home based providers (2)
- OEC registry is lengthy and cumbersome (1)
- More information, better communication for parents to gather information on non-traditional hour care and availability of infant and toddler slots (3)
- Concentrate efforts on increasing wages in order to recruit and train an effective childcare workforce (2)
- Care 4 Kids rates are still too low to cover the cost of quality care (1)
- Support for OEC continuing to work with the SDE to assist food programs with bilingual resources (1)
- Assess how parents pursuing higher education can receive additional assistance (1)

**Appendix A - Verbatim Transcripts**

## **Section 1: Define CCDF Leadership and Coordination with Relevant Systems**

Oral comment - May 15, Housatonic CC - Dr. Monette Ferguson

I think we could use some more robust language on the resources and not so much the how but the what. What kind of resources and what we can do to rally and usher these families into our program that so desperately need these services.

Written comment - May 17, United Way of Greater New Haven - Tabitha Sookdeo

I have a concern for educators in the ECE field who only have an AA or AS. Cost of higher education is unattainable with regard to salaries and the availability of classes. Many ECE classes are only available during working hours. Our assistant teachers and aides in CT tend to be women of color, from predominantly lower socio-economic backgrounds. The disproportionality is difficult to ignore. I think it is important to explicitly name the issues of racial inequality in conjunction with educational attainment.

Online comment - respondent 36

The announcement of the public hearings was much later than the 4/20/18 date in the plan -- The OEC website post was on 5/11/18 which meant that I was unable to attend any of the hearings. While this on-line system is a great step, I am very disappointed in how these mandated public hearings were rolled out.

Online comment - respondent 14

Who assists parents in locating child care (consumer education): please considering selecting the "Community-based organizations" option and include All Our Kin's Provider Showcase website, which connects parents to high-quality family child care options by featuring family child care providers who have achieved NAFCC Accreditation or who are part of our Early Head Start-Child Care Partnership. Here is the website:

<http://www.showcase.allourkin.org/>

One of the options listed is "Providing translation in other languages." In the future, OEC should consider translating the CCDF plan into Spanish, and facilitating public comment (in-person and via survey) in a way that allows Spanish-speakers to participate equally, given the large percentage of Spanish-speaking child care providers and families in the state. This would also align well with OEC's Action Plan goals around improved communication and collaboration with providers and families.

Online comment - respondent 58

KinderCare Education strongly recommends the Office of Early Childhood (OEC) consider the importance of including the direct beneficiaries of the child care subsidy program - child care providers and families - in any planning or implementation discussions. Without the continued input from these system end-users, OEC is lacking critical information and context for expanding accessibility and continuity of care. KinderCare Education recommends OEC facilitate meetings across the state with child care providers serving children receiving child care subsidy, including applicable military subsidy, and individual meetings with child care provider organizations such as the Connecticut Child Care Association. These meetings would be independent of public stakeholder meetings and focused specifically on the goals and outcomes for CCDF providers. A plan that includes a three-year implementation strategy must include those responsible for supplying the strategy. In addition, OEC must provide and promote more opportunities for parents to participate in the planning and implementation process for the program that impacts those closest to them the most: their children. While we understand parents have an opportunity to be part of the public hearing process, OEC should extend targeted outreach specifically to parents receiving CCDF and consider soliciting additional feedback from area PTA organizations, especially for kindergarten

transition processes. In order to reach more parents and increase participation in the CCDF program, OEC must be up-to-date on parent concerns and needs through accessible focus groups.

Online comment - respondent 22

Partnerships with community colleges and universities to enable students enrolled in Early Childhood degree programs to access care for their own children is an interesting and fairly limited way for the system to learn about the issues related to student use of childcare subsidies. I might suggest that adult ed programs might also be good partners for childcare while parents earn a high school degree or equivalency. This would have a two generation impact. It would support some of the highest need children by getting them into high quality care while their parents complete high school and increase their ability to earn a living. In general I applaud the efforts to be creative in the use of contracts and partnerships to serve discrete high need populations.

Online comment - respondent 32

In addition to the proposed partnerships with community colleges and universities to enable students enrolled in Early Childhood degree programs to access care for their own children, the Connecticut Early Childhood Alliance also recommends partnering with Adult Education programs to assist parents earning a high school degree or equivalency. Both would have a two generation impact, and partnering with Adult Education will support some of the highest need children by getting them into high quality care while their parents complete high school and increase their ability to earn a living. The Alliance supports efforts to be creative in the use of contracts and partnerships to serve discrete high need populations.

Online comment - respondent 41

In addition to the proposed partnerships with community colleges and universities to enable students enrolled in Early Childhood degree programs to access care for their own children, YWCA Hartford Early Learning Centers also recommend partnering with Adult Education programs to assist parents earning a high school degree or equivalency. Both would have a two generation impact, and partnering with Adult Education will support some of the highest need children by getting them into high quality care while their parents complete high school and increase their ability to earn a living. YWCA Hartford Early Learning Centers support efforts to be creative in the use of contracts and partnerships to serve discrete high need populations.

## **Section 2: Promote Family Engagement Through Outreach and Consumer Education**

Oral comment - May 17, United Way of Greater New Haven - Natalie Viera

We think two great steps for this are starting with translation of literally everything that comes out of the Office of Early Childhood, and then providing more trainings in Spanish. Particularly I want to call out medication administration training, we really think that Spanish speaking family child care providers may be at risk of not being in compliance by the September 30<sup>th</sup> deadline of this year [2018] for the health and safety requirements just because there's not enough medication administration trainings being offered in Spanish coming out of thrive. We do know some providers, both for CPR and medication administration, who are looking at classes where they need to pay somewhat of a significant sum of money even though they're receiving the child care subsidy and should be eligible for these free classes just because there aren't enough being offered.

Written comment - May 17, United Way of Greater New Haven - Lynn Wiener

Please focus on the importance of support to children, families, and staff for children with challenging behaviors. While many staff believe they are knowledgeable and have abilities to foster positive guidance, my recent study for my doctorate found that the parties efforts still followed reactive and in some cases negative strategies. Please continue support of [the] pyramid model and the pilot of the policy to eliminate expulsion in pre-k.

Written comment - May 17, United Way of Greater New Haven - Tabitha Sookdeo

Pilot program to reduce suspension and expulsion is great. Perhaps we can also look to incorporate trauma-informed care. Look into New Haven CHILD, "Children's Ideal Learning District", headed up by Bank Street's Emily Sharrock and Friends Center for Children's Allyx Schiavone [newhavenchild.org](http://newhavenchild.org).

Online comment - respondent 58

KinderCare Education strongly supports the inclusion of national accreditation status in child care search results. When parents have easy access to information about high quality child care they are more likely to choose that option for their child. In addition, when child care providers receive additional family exposure based on their quality, it incentivizes participation in national accreditation programs.

### **Section 3: Provide Stable Child Care Financial Assistance to Families**

#### Online comment - respondent 14

We support OEC in exploring a broader definition for eligibility around job training and education. It would be great to open access to the subsidy to parents pursuing higher education or specific job training programs; this is a truly two-generation strategy that has the potential to lift families out of poverty and aligns well with OEC's focus on the whole family.

The presentation given by OEC at the Early Childhood Cabinet Meeting on May 7 proposed the idea of waving the 2% parent co-payment for the lowest-income families, at or below 20% SMI. All Our Kin supports this idea. Given the cost calculations presented by OEC, it seems a relatively small expense for the state that could make a big difference for the financial viability of families.

#### Online comment - respondent 22

"Connecticut's Care4Kids rates for certain age groups, regions and setting types are so low, unless families are able to contribute funds above the state subsidy, they may be unable to purchase any care" p.70 This is probably the most important sentence in the entire 171 page document. While much of the rest of the country has moved towards more licensed care, CT remains an outlier with many of the youngest, poorest children of color remaining in relative care due to obscenely low payment rates for center based care.

#### Online comment - respondent 32

"Connecticut's Care4Kids rates for certain age groups, regions and setting types are so low, unless families are able to contribute funds above the state subsidy, they may be unable to purchase any care" p.70 This is probably the most important sentence in the entire 171 page document. Low Care4Kids rates limit family choice and access, and often lead families into illegal care. Family contributions to make up for low rates further exacerbate the problem. The Alliance supports limiting family contributions for families below the federal poverty line. The Connecticut Early Childhood Alliance also strongly urges an increase in rates, especially in age groups, regions and setting types where rates are significantly below the federal recommendation of the 75th percentile of market rate. An increase in rates will decrease the need for higher family contributions.

#### Online comment - respondent 41

"Connecticut's Care4Kids rates for certain age groups, regions and setting types are so low, unless families are able to contribute funds above the state subsidy, they may be unable to purchase any care" p.70 This is probably the most important sentence in the entire 171 page document. Low Care4Kids rates limit family choice and access, and often lead families into illegal care. Family contributions to make up for low rates further exacerbate the problem. The YWCA Hartford Early Learning Centers support limiting family contributions for families below the federal poverty line. The YWCA Hartford Early Learning Centers also strongly urges an increase in rates, especially in age groups, regions and setting types where rates are significantly below the federal recommendation of the 75th percentile of market rate. An increase in rates will decrease the need for higher family contributions.

#### Online comment - respondent 43

Working families and staff cannot choose quality child care with the current requirements for C4Ks. Family contributions even after C4K subsidy cannot afford tuition.

#### Online comment - respondent 49

It would be of great benefit to the Early Head Start program that I manage if the family fee for Care for Kids was waived for all families at or below the federal poverty line. I urge OEC to waive this fee for families enrolled in EHS/HS programs.

Online comment - respondent 51

I strongly urge OEC to change the Care for Kids subsidy requirements in order to waive family fees for all working families whose income is below the federal poverty line.

Online comment - respondent 54

I strongly urge OEC to change the Care for Kids subsidy requirements in order to waive family fees for all working families whose income is below the federal poverty line.

Online comment - respondent 56

I strongly urge OEC to change the Care for Kids subsidy requirements in order to waive family fees for all working families whose income is below the federal poverty line."

Online comment - respondent 58

KinderCare Education strongly recommends OEC and the state Legislature work together to update the income eligibility guidelines. With the recent state minimum wage increase, fewer and fewer hardworking families that need child care find themselves eligible for child care subsidy. These families are neither wealthy nor have they yet secured themselves a position in the middle class. We strongly recommend OEC thoughtfully use the state's expected \$18 million Federal increase in CCDBG funding to continue to respond to the changing income standards in the state. Connecticut must ensure families are not left with the choice of wage security and placing their child in suboptimal or unsafe child care settings. KinderCare Education stands firm that using the anticipated \$18 million Federal increase to implement an increase in eligibility thresholds is the number one way to increase participation of Connecticut's child care providers and parents in the child care subsidy program and improve the quality of care available. 3.1.5 KinderCare Education supports OEC's commitment to improving the quality of care available for infants. We commend the Office for recognizing the dangers of unlicensed and illegal child care. We support any legislation that would provide for accelerated access to child care subsidy for parents of infants and strongly recommend OEC use some of the Federal investment to prevent any further waitlist in any age groups. 3.1.8 KinderCare Education strongly supports OEC's plan to facilitate a workgroup to gather feedback on the eligibility and intake process. As the state's largest private provider of child care, we interact daily with thousands of families at our 27 child care centers across Connecticut. We welcome any opportunity to participate in this workgroup and provide support for increasing participation in the Care4Kids program.

KinderCare Education supports OEC's review and analysis of the Prioritization on Services. The current system does not align with the intent of CCDBG and the categories do not provide sufficient access for some of the state's most vulnerable families, including children experiencing homelessness. We recommend OEC continue to address the prioritization in upcoming workgroups with providers and parents participating in Care4Kids.

KinderCare Education supports OEC's policy to allow providers to charge families additional amounts above the required co-payment. We commend OEC for recognizing that the current reimbursement rates are not sufficient to provide equal access.

Online comment - respondent 59

I strongly urge OEC to change the Care4Kids requirements in order to waive family fees for all working families whose income is below poverty line. Thank You.

Online comment - respondent 60

I strongly urge OEC to change the Care for Kids subsidy requirements in order to waive family fees for all working families whose income is below the federal poverty line.

Online comment - respondent 61

Strongly urge OEC to waive the struggling working earning below poverty family fees

Online comment - respondent 68

I strongly urge OEC to change the Care for Kids subsidy requirements in order to waive family fees for all working families whose income is below the federal poverty line.

#### **Section 4: Ensure Equal Access to Child Care for Low-Income Children**

Online comment - respondent 14

Subsection 4.1.3 ii: All Our Kin applauds the focus on family child care networks/shared services; Early Head Start-Child Care Partnerships; infant/toddler infrastructure development; and direct slot funding in the areas of highest need. Subsection 4.1.3 b): All Our Kin applauds the focus on non-traditional hour care.

Subsection 4.3.2: All Our Kin supports increasing rates for infant/toddler and non-traditional hour care and affirms the important role of family child care in caring for CT's youngest children and caring for children during non-traditional hours. Increasing rates is an important way to increase capacity for infant/toddler and non-traditional hour care to meet the diverse needs of today's working families.

Subsections 4.6.1 and 4.6.2: All Our Kin applauds the OEC's focus on increasing capacity in these critical areas of need.

Online comment - respondent 22

CT's payment rates as a percentile of the market rate have to be some of the very lowest in the country. When looking at the percentile levels of payments in centers vs. family child care it is hard not to be struck by the difference. When one understands that the reason family childcare rates are so much higher as a percentile is that they have unionized, it's hard not to think that the answer for centers is to unionize as well.

I'm glad I'm not the one has to certify that CT's Care4Kids rates are sufficient to ensure equal access for eligible families to child care services comparable to those provided by families not receiving CCDF assistance, because the facts simply don't support that. When a low income parent has to pay \$130 a week more than the Care4Kids parent fee in order to access an infant toddler slot it is clear that is impossible and the parent is effectively being denied access to care.

I am very happy to see OEC considering the use of contracts to build supply particularly for infant and toddler slots. It is shocking to see that there are 5 cities with shortages of over 2,000 infant toddler slots each.

Online comment - respondent 32

There are areas in Connecticut where the data shows we have extremely limited supply of care. The Connecticut Early Childhood Alliance supports the use of contracts to expand the supply of care, particularly in geographic shortage areas as well as type of care, specifically infants and toddlers and non-traditional hours.

The Connecticut Early Childhood Alliance believes that Care4Kids rates are not sufficient to ensure equal access for eligible families to child care services comparable to those provided by families not receiving CCDF assistance. It is clear that low income parents will not be able to pay more and are being denied access to care. The Alliance supports limiting family contributions for families below the federal poverty line.

CT's payment rates as a percentile of the market rate have to be some of the very lowest in the country. When looking at the percentile levels of payments in centers vs. family child care it is hard not to be struck by the difference. The Connecticut Early Childhood Alliance urges an increase in rates and the development of a plan so that rates catch up to and keep up with the 75th percentile of market rate.

Online comment - respondent 36

Payment rates are too low and OEC needs to tweak their formulas to help families have more choices. The low rates limit our choices. CT is an expensive state, and the rates do not accurately reflect this.

Online comment - respondent 41

There are areas in Connecticut where the data shows we have extremely limited supply of care. The YWCA Hartford Early Learning Centers support the use of contracts to expand the supply of care, particularly in geographic shortage areas as well as type of care, specifically infants and toddlers and non-traditional hours.

CT's payment rates as a percentile of the market rate have to be some of the very lowest in the country. When looking at the percentile levels of payments in centers vs. family child care it is hard not to be struck by the difference. The YWCA Hartford Early Learning Centers urges an increase in rates and the development of a plan so that rates catch up to and keep up with the 75th percentile of market rate.

The YWCA Hartford Early Learning Centers believe that Care4Kids rates are not sufficient to ensure equal access for eligible families to child care services comparable to those provided by families not receiving CCDF assistance. It is clear that low income parents will not be able to pay more and are being denied access to care. The Alliance supports limiting family contributions for families below the federal poverty line.

Online comment - respondent 58

KinderCare Education supports the anticipated increase in infant reimbursement rates to the 10th percentile of the most recent (2018) market rate survey (MRS). Unfortunately, this increase is still too low to ensure that child care providers have the resources they need to meet very basic minimum health and safety standards. We join OEC in the recognition that parents are faced with difficult choices that can result in horrible outcomes. We strongly recommend OEC and the legislature continue to work towards increasing child care provider base reimbursement payments to more accurately reflect the cost of care. The new Federal investment in child care will give Connecticut more resources to improve access for working families.

## **Section 5: Establish Standards and Monitoring Processes To Ensure the Health and Safety of Child Care Settings**

Oral comment - May 17, United Way of Greater New Haven - Natalie Vieira

We would just love to see once again some explicit language acknowledging what could be a potentially prohibitive cost as a result of the high cost of background checks, acknowledging that an unequal burden on family child care because they do need to have a background check for anyone in the household over sixteen. And then we would encourage language around intention, if there is intention, to reduce cost for providers by working with state police or working with state legislators to introduce legislation.

Oral comment - May 17. United way of Greater New Haven - Lynn Wiener

I just wanted to comment on the fingerprint coordination, and the importance of having more equality around the fingerprint process. ... To be fingerprinted five times for five different organizations I think is a [pause] could be looked at as a change. I know in other states such as in Arizona and Nevada have a very concise system and I would strongly recommend that you look at it.

Written comment - May 17, United Way of Greater New Haven - Lynn Wiener

It is important to coordinate and integrate all areas of finger printing systems into one state system. Please integrate DCF, OEC, and all finger printing systems into one that incorporates all.

Online comment - respondent 14

Subsection 5.2.3: In discussing the CCDF provider training requirements, it is critical to note that the CPR/First Aid and Medication Administration classes currently being offered through the state are insufficient to meet the needs of Spanish-speaking family child care providers. This issue has been raised several times, without any noticeable increase in Spanish offerings. Many Spanish-speaking family child care providers who receive the child care subsidy have been paying for classes even though they are entitled to free classes through the state, because there is not enough capacity through Thrive!

Subsection 5.3.1: Without increasing trainings for Spanish-speaking providers, particularly Medication Administration training for family child care, the state is setting these providers up to fail in terms of health and safety compliance by the September 30th deadline. Subsection 5.3.5: All Our Kin is excited about OEC's push to improve licensing support for providers, transforming the role of inspectors from "judges" to "coaches." We encourage OEC to include language in the CCDF plan about efforts around inter-rater reliability

Subsection 5.4.9: OEC's response on the draft plan does not fully answer the question--do the fees charged exceed the actual cost of administering the background check? Can OEC include a statement acknowledging the potentially prohibitive cost of background checks, and the unequal burden on family child care? Would OEC be willing to include a statement about intent to work with state police and state legislators around lowering background check costs?

Online comment - respondent 29

5.2.3 Would be great if the pre-service online training could be different for school-age providers so that it is appropriate to the ages they serve. Preventing SIDS and shaken baby, for example, need not be included. 5.2.5 Ongoing training requirements - for center-based providers, the 1% of annual hours worked should NOT include the time spent at CPR, First Aid and Medication trainings. This would leave 10-20 hours (for school age part-time at 10 hours, or for full-time early educators at 20 hours) to attend workshops and trainings that improve program quality.

The state should contract with other state departments and regional agencies to provide fingerprint and background check services at a minimal cost of \$5 per person. This is one of our biggest regulatory costs, and would be the best way OEC could help providers.

Online comment - respondent 62

5.2.5 The Core Knowledge and Competencies for After School Providers prepared by the National After School Association is widely used throughout the country and is endorsed by the Connecticut After School Network. This reflection tool is an important alternative for school-age care providers that is more appropriate to the ages they serve and should be included here for each of the 12 subsections as an alternative to the CKCs for early care. Please see the school-age CKCs here: [http://naaweb.org/images/pdf/NAA\\_Final\\_Print.pdf](http://naaweb.org/images/pdf/NAA_Final_Print.pdf)

## **Section 6: Recruit and Retain a Qualified and Effective Child Care Workforce**

Oral comment - May 15, Housatonic CC - Dr. Monette Ferguson

Also I'd like to see more robust language around section six, recruit and retain a qualified and effective childcare workforce. As a provider I am not quite sure what this language means, I'm sure there's a lot more detail in the plan but over the last three years, I don't see the resources that I need, not necessarily coming from the OEC, but from anywhere in the state to recruit and retain a qualified and effective childcare workforce.

Oral comment - May 17, United Way of Greater New Haven - Natalie Vieira

It would be great to explicitly state, for this state professional development advisory group, which voices should be represented and we would love to see that family childcare is definitely going to be represented on that group that's coming up with the statewide professional development system.

It would also be great to have language about the unique challenges faced by family childcare providers in pursuing training and higher education opportunities and how the state plans to really address those by ensuring access to classes at night for example, by ensuring access to higher education that's translated into Spanish, by providing childcare.

Oral comment - May 17, United Way of Greater New Haven - Lynn Wiener

In regard to understanding and supporting children with challenging behavior in early childhood, the study that I conducted for my dissertation included looking at early childhood professionals and their leadership skills and their ability to actually investigate children with challenging behavior. Unfortunately the results did prove that while we had very transformational leaders in early childhood, the skills that they're using to offset children with challenging behavior still remains sort of negative and reactive instead of looking at proactive ways to help children learn. I would really hope that the state investigates further opportunities to reduce expulsion, but not just reduce expulsion without training for good staff.

Written comment - May 17, United Way of Greater New Haven - Lynn Wiener

Please focus on the importance of support to children, families, and staff for children with challenging behaviors. While many staff believe they are knowledgeable and have abilities to foster positive guidance, my recent study for my doctorate found that the parties efforts still followed reactive and in some cases negative strategies. Please continue support of [the] pyramid model and the pilot of the policy to eliminate expulsion in pre-k.

Online comment - respondent 14

Subsection 6.1.1: All Our Kin suggests that OEC explicitly name some groups that must be represented on the Early Childhood Professional Learning Advisory Committee, including family child care. For section 6 on the whole, there should be an acknowledgement of the unique challenges that family child care providers face in pursuing higher education and training opportunities, and the importance of addressing these challenges so that family child care is included in state systems of professional development in meaningful ways.

Subsection 6.2.3: All Our Kin is excited to see OEC's explicit commitment to providing translation and bilingual training sessions.

Online comment - respondent 19

The Connecticut Alliance of YMCAs represents 21 YMCAs across the state of Connecticut. We would like to share specific comments regarding Section 6.2 Training and Professional Development Requirements. This section specifically states that, "ongoing training and professional development should be accessible and appropriate to the setting and age of the children served." We would offer the following comments; A waiver from the 18 hours of training requirements should be available for organizations that can prove they are meeting the requirements of the online training. We would in particular refer to the camp staff of the Ys in Connecticut, who on average attend over 35 hours of training the week before camp officially begins. In addition, it is burdensome for our after school staff to attend 18 hours of training when they are only working on average 10 hours a week. We do not believe the current training standards are age appropriate. The fact that camp staff, after school program staff and early child care worker staff must undergo the same training as an infant/toddler teacher is not an adequate use of their time or resources. Camp staff, after school program staff and early child care worker staff should not have to be trained, for example, in proper diaper changing procedures and safe sleeping for infants. We would also recommend that training opportunities also be conducted in a classroom setting in order for it to be accessible for all of our staff. We have staff who do not have access to technology, especially our camp staff and after school program staff.

Online comment - respondent 22

It is disappointing that the federal government has asked no questions about compensation in Section 6. In doing so they contribute to the misguided believe that we can regulate our way in to a Qualified and Effective Workforce. That is impossible when childcare providers are paid poverty wages.

Online comment - respondent 57

There is a need to help build bilingual capacity and number of bilingual trainers available.

Online comment - respondent 62

6.1.1 The Core Knowledge and Competencies for After School Providers prepared by the National After School Association is widely used throughout the country and is endorsed by the Connecticut After School Network. This document is an important alternative for school-age care providers that is more appropriate to the ages they serve and should be used as the professional development framework for school-age child care providers. Please see the school-age CKCs here: [http://naaweb.org/images/pdf/NAA\\_Final\\_Print.pdf](http://naaweb.org/images/pdf/NAA_Final_Print.pdf)

6.2.1 and 6.2.5 these sections should also refer to the School-age CKCs

## **Section 7: Support Continuous Quality Improvement**

Oral comment - May 15, Housatonic CC - Dr. Monette Ferguson

Section seven is pretty robust, I'm sure it will be updated, again my platform and my concern is always about access for community and quality programs, we do run a community based program, but we also partner very closely with home based programs and school based programs and really partnership and collaboration is the only way we can get quality work done in this space because there's such a variety in the state. Through this type of funding it looks like we have a lot of flexibility and hopefully through the president's budget, there's an increase. So hopefully we can push forward a lot of the plans and make them implemented in a way that's accessible to our most vulnerable population and also care givers.

Oral comment - May 17, United Way of Greater New Haven - Natalie Vieira

Our worry is really that as OEC is collecting feedback and data on the pilot that's going to be used to finalize this plan, because there was so little family childcare participation in the pilot, there is going to be very little family childcare data to inform the final plan. So we would just urge OEC to hold off on finalizing that formal plan until there's some better way to make sure there's significant family childcare voice and data represented.

Online comment - respondent 14

Subsection 7.4.1: All Our Kin is concerned about the barriers to participation in the QRIS pilot for family child care providers. We know that many (if not most) family child care providers dropped out before completion of the pilot; this translates to a lack of family child care data and feedback to inform the final model. All Our Kin urges OEC not to finalize a QRIS without a critical analysis of the barriers to participation in the pilot and additional efforts to ensure that the voice of family child care is heard and included. Subsection 7.4.3: QRIS alignment with NAFCC is incredibly important! We urge OEC to align the standards closely to eliminate unnecessary burdens on providers and acknowledge the national model that already exists for assessing high quality in family child care settings.

Subsection 7.5.1: All Our Kin is excited to be included in the shared services initiative to support infant and toddler care through investments in family child care; we hope that there will be sustained funding for this important work.

Subsection 7.9.1: All Our Kin is thrilled to see that OEC will be supporting family child care providers in achieving NAFCC Accreditation. All Our Kin has developed a model for helping providers achieve accreditation that has resulted in a significant increase in accredited providers in CT (before the start of All Our Kin's program, there was only 1 NAFCC accredited provider in CT), with many more in the pipeline. We are happy to share information about our model with OEC for the purpose of benefitting family child care providers statewide.

Online comment - respondent 29

7.3.1 OEC should include a plan to greatly expand the number of trainings in CPR, First Aid, and Medication in August-November each year to meet the demand. Many of our front-line staff do not have their own cars and cannot travel far to attend these trainings, so having them around the state is a great idea, but we need three times the number of offerings during the start of the school year to meet the need.

Online comment - respondent 58

KinderCare Education strongly supports OEC's commitment to improving the quality of child care by supporting national NAEYC accreditation. The financial incentives provided through CCDF help to support programs in

reaching higher standards. We look forward to the state's plan to expand the quality rating improvement system to all providers statewide.

Online comment - respondent 62

7.3.1 under "Other Investments" (pg. 145) The Office of Early Childhood also supports the work of the Childhood Conversations Annual Conference which provides timely, topical information for providers and parents together, including social and emotional learning and trauma-informed practice related to children through age 12. The OEC plans to continue to partner with the Connecticut After School Network to provide relevant training and professional development opportunities for providers in a range of settings.

7.9.2 While NAEYC has an optional school age accreditation option for those programs that are currently NAEYC accredited, Connecticut could be discussing with the Connecticut After School Network ways to develop Connecticut-specific state-level school age accreditation for stand-alone school-age programs similar to the New York State Afterschool Program Accreditation System.

**Section 8: Ensure Grantee Program Integrity and Accountability**

No comments

## General Comments

Oral comment - May 17, United Way of Greater New Haven - Natalie Vieira

Expanding job training and education eligibility definition to include more parents. We have really seen firsthand the need for child care assistance for parents particularly pursuing higher education.

Waving 2% parent fee for our very poorest families, those at or below 20% of state median income. ... Given the expense prediction that OEC presented, it seems like a relatively small cost to the state that can make a huge, huge difference for the lowest income families.

Supporting both providers and families for whom English is a second language. These providers and families continue to face inequitable access to information, resources, and training. ... I'm not saying there aren't steps being taken, I just think that we have farther to go if we really want equitable access for all.

Oral comment - May 17, CT Office of Early Childhood - Eva Bermudez

The things we are concerned about, access to bilingual materials, access to making this process a little bit easier to navigate. We have a lot of childcare providers, over 60% of our bargaining unit is non - or bilingual or monolingual speakers. That means that whenever we have a contract negotiation, whenever we have an educational moment, we have to make sure we're translating, we have to make sure we're giving them access to that information in their language. In our childcare program we have over 15 languages that are spoken, primarily Spanish speakers, the second contender to that other than English is Portuguese speakers. With our Portuguese speakers, luckily for us there's so many similarities that we're able to send them documents that are in Spanish and then if they have questions or curiosities, we make sure that our Portuguese speaking staff, including myself, help out in translating those documents. So we would like to see the OEC make those positive steps forward to reflect those changes in other languages, including this process of testifying.

We'd also like to focus on the mention of raising the rates for childcare providers. There is a lot of good details and when I submit this testimony via an electronic format or by paper, I will cite the sections to be more specific. But overall, the document has a lot of references on funding and giving access for providers, but it does not stipulate if it is a center base versus an in home daycare provider, so we would just like clarity. We'd also like to remind and on the record say that with the collective bargaining process there is a process in place for negotiating increasing in raises and making sure that this document doesn't legally try to supersede or give a reflection that circumvents the collective bargaining process.

There were bullet points that were made of the lack of infant and toddler slots, and hopefully a little more focus on opening up those slots. We would also like to see the OEC registry change, but in a way that - we have gotten a lot of complaints in our office that it's cumbersome, and this goes back into the language. I as a director still haven't fully ascertained if the complaints on the registry have to do with language or the complaints on the registry are because the process is too long. Either way we are here to communicate and try to figure out a way of how to make that a little easier for our providers considering that we represent the majority of in home daycare providers. They need to use the registry for the majority of their certifications and for moving forward with their licenses.

The first step of free training is difficult to navigate and the licensing rights have to be hopefully looked into. ... They would like the office to verify summer capacity and the changes in summer capacity so they have the ability to do a higher capacity level since the children in their full daytime care fluctuate in the summer.

We would also like to collaborate with the office so the licensing process becomes more supportive. We love the orientation process, we love the fact that the very first interaction the providers get is a conversation with the OEC, a conversation with a licensing expert, and a collaboration with the union and we would like to make sure that that is maintained.

Our child care providers are also a little concerned of the ability of access and hours for non-traditional care. They would like more incentives to allow themselves to care for children from midnight to 7AM, or those odd hours, and the more access for the parents to gather that information of when they're available. So we have the wonderful resource of 211 and they're listed whenever they're available, but we'd like to see that go a little step further and highlight those people who are providers who allow their daycare center to be open nontraditional hours.

Our providers also would like more information accessible to them for career ladder and more information for incentives and information on NAFCC and NAEYC ratings. We have these wonderful bonuses that they have access to, we would love to see that be maintained, but information and access to that would be wonderful.

Our providers also would like better communication between parents and the OEC, and we want to know as a union, how can we help to make that conversation easier. So right now, whatever you send to us on the LISTSERV of OEC, we take that process that and then we, exactly how it's sent to us, we don't alter it, we send it back to the providers. Of course you have access to all the providers who are currently licensed. We just want to make sure we are reinforcing the classes, the courses, the trainings and reminding them that the OEC does have a lot of materials out there, OEC does have a lot of educational opportunities. So we're just reinforcing that information and just let us know how else we can be of help. We also, to reinforce the message, we blast information on our social media page, we let our providers know that they should talk to their parents about applications and the application process and refer them back to 211 and refer them back to OEC. Again, if there is a place there to remind providers of Care for Kids the open slots, then let us know because we're here to help.

We would like more dialogue on the rates and concentrating on what's going to happen in this with childcare providers and home childcare providers and how those funding sources are going to be allocated. Our license providers still don't make enough to occasionally make those fixes and buy the materials that they need to continue their programming and curriculum for children, so, it is key that we are focusing on giving them all the help that they need to do their job and do it well. A lot of our providers are very excited to go back to school, obtain their CDA, go to ESL classes so that way they can have a curriculum that is bilingual. We have many providers who are interested in receiving, obtaining a bachelor's degree for early childhood education and to make that possible we need funding accessible because a lot of our childcare providers are low income and do not have the means to pay for a higher education. So, in this draft plan if we have a little bit more education and funding allocation highlighted, that would be tremendous for us.

Online comment - respondent 32

The Connecticut Early Childhood Alliance places a strong emphasis on the need to increase wages in the early childhood workforce in order to recruit and retain a qualified and effective workforce. While there are no questions about compensation in Section 6, we urge the Office of Early Childhood to concentrate efforts on increasing wages because regulation alone will not result in a qualified and effective workforce.

Online comment - respondent 41

The YWCA Hartford Early Learning Centers place a strong emphasis on the need to increase wages in the early childhood workforce in order to recruit and retain a qualified and effective workforce. While there are no questions about compensation in Section 6, we urge the Office of Early Childhood to concentrate efforts on increasing wages because regulation alone will not result in a qualified and effective workforce.

Online comment - respondent 58

KinderCare Education is honored each day to provide high-quality education and care to over 170,000 children across the United States, including nearly 2,500 here in Connecticut. Our children range in age from six weeks to 12 years of age. We are committed to serving all children regardless of background and financial circumstance, and we are proud of the diverse group of children we currently serve. Approximately 15% of our children in Connecticut are from hardworking families who receive assistance under the Child Care and Development Block Grant (CCDBG). We appreciate the opportunity to submit comments on the draft CCDF plan. If we can be of further support in the development or implementation of this plan, please do not hesitate to contact us.

Online comment - respondent 67

CSEA SEIU Comments on the CCDF Draft Plan Notes on Sec. 1 Sec. 1.4. RE: CADCFP (“The Food Program”) Not all food programs have bilingual staff and resources. We support the efforts of the OEC to work with SDE to assist the State's food programs with bilingual resources. We have long supported providing success to childcare subsidy while the parent is attending school and would support assessing the feasibility of assisting parents who want to attend early childhood training or a high school degree or equivalency. A next step would be to assess how many parents attending CAN or nursing studies could receive some assistance. We would also like more clarity in the relationship between Family Child Care Providers and foster care. There are a large number of FCC Providers who provide foster care who often ask the union for clarity on payments and differentials. It would also be helpful to have a Q & A to provide providers who are interested in connecting to lead agencies. Sec. 2 2.1.2. Family childcare homes provide care for children with disabilities but many lack resources to make accommodations to their homes. CSEA supports a process to grant funds for facility infrastructure to all settings including home based providers who meet a high need for infant and toddler care and who often provide care for workers who work non-traditional hours. 2.3. Regarding accessibility of the website, the licensing regulations should be posted in Spanish. 2.3.6 RE: Partnering on Public Information Communications CSEA once held a successful resource fair jointly with Education Advisors of the Office of Early Childhood and we hope to partner with the Office again Other Sections: Sec. 3 Care4Kids rates are still too low to cover the cost of quality care, and not just in the infant/toddler category. We support increasing rates in a way that is consistent with our collective bargaining law.

**Appendix B - Schedule of Public Forums**

May 15, 2018 1-3 PM

Housatonic Community College - Beacon Hall, Classroom 273

900 Lafayette Blvd.

Bridgeport, CT

May 17, 2018 10-12 PM

United Way of Greater New Haven

370 James Street, Suite 403

New Haven, CT

May 17, 2018 5-7 PM

CT Office of Early Childhood - North Tower Plaza Room C

450 Columbus Blvd.

Hartford, CT