

Connecticut's Proposed CCDF Plan 2025-2027 Public Comments

The Connecticut Office of Early Childhood (OEC) solicited feedback and input from families, providers, and other stakeholders on the Connecticut 2025-2027 Child Care and Development Fund (CCDF) Plan. OEC provided several channels and opportunities for public feedback:

- Oral testimony collected during public Webinar held on May 13, 2024.
- Electronically through an online submission portal

OEC received a total of 33 comments from 7 individuals across the two channels, which have been transcribed and summarized into this report. Verbatim transcripts can be found in Appendix A.

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	1	3%
2	4	12%
3	1	3%
4	10	30%
5	4	12%
6	5	15%
7	5	15%
8	1	3%
9	1	3%
10	0	0%
General Comments	1	3%

Comment Summaries

Section 1: CCDF Program Administration (p.6)

1.3 Solicit input from FCC providers on Plan drafting at least 6 months before the plan is due to increase participation in public comment. (1)

Section 2: Child and Family Eligibility and Enrollment and Continuity of Care (p.14)

2.2.2.c Include individuals that are pursuing a graduate degree such as a Masters. (1)

2.5 The redetermination process needs to be easier. (2)

2.5 Suggestion to create an app for Care4Kids. (1)

Section 3: Child Care Affordability (p.37)

3.1.1 Reduce parent co-pay to 7% of income. (1)

Section 4: Parental Choice, Equal Access, Payment Rates, and Payment Practices (p.42)

4.1 Consider instituting presumptive eligibility in the application process. (1)

4.2.2 d Include NASBE accreditation in this section. (1)

4.3 Increase subsidy rates for non-traditional hours for greater flexibility for families working multiple shifts or jobs. (1)

4.3.2 Align Care 4 Kids reimbursement rates with the true cost of high-quality care. (2)

4.3.2 20% of market rate for family childcare for preschool is too low. (1)

4.3.2 Include rates for unlicensed providers in the plan. (1)

4.3.3.b Include the 3% differential for ECE degrees. (1)

4.4 Implement enrollment-based subsidy payments in advance to improve providers financial planning and budgeting. (2)

Section 5: Health and Safety of Child Care Settings (p.66)

5.1 Ratios for licensed and license-exempt providers are not represented. (1)

5.2 Concern for ratio and group size for 2-year-olds. (1)

5.2 Clarify the ratio and group size for 1-year olds. (1)

5.6 Hold trainings at night and on weekends with offerings in native languages. (1)

Section 6: Support for a Skilled, Qualified, and Compensated Child Care Workforce (p.137)

6.1 Increase access to benefits, and reward continued professional learning. (1)

6.1 Positive comment on OEC offering monthly webinars related to mental health. (1)

6.1 Support for providing bonuses directly to staff. (1)

6.1 Include Family Child Care educators in the Qualified Workforce Incentive. (1)

6.1.1.c In addition to mentioning Access Health, include mention of the union's health care workgroup. (1)

Section 7: Quality Improvement Activities (p.150)

7.2 Positive comment, OEC support for Family Child Care networks. (1)

7.2 Continue to use CCDF funds to invest in coaching, training, and coverage of accreditation costs to enhance quality and support educators. (1)

7.2 Positive comment, state developing a Quality Improvement System aligned with licensing standards and national accreditation. (1)

7.2 Collaborate with family child care educators to understand their experience with Elevate in addition to their ongoing professional development needs. (1)

7.2.1.b.i Increase use of quality set aside funds specifically for programs serving school-age children. (1)

Full suggested edit:

Future investments may include building sustainable coaching and mentoring practices within programs, and further collaboration with the Connecticut Network for Children and Youth to provide free and low-cost training specifically for school-age programs aligned to best practice for this age group.

Section 8: Lead Agency Coordination and Partnerships to Support Service Delivery (p.155)

8.1.1.o The Connecticut After School Network changed its name since the last plan was released. (1)

Full suggested edit:

The OEC continues to work with the Connecticut Network for Children and Youth, the statewide afterschool network, to address the pressing issue of ensuring quality in afterschool programs. The Connecticut Network for Children and Youth provides a variety of conferences, fee-for-service trainings, and consultation that meets providers where they are and helps to assess programs' progress made towards goals. The OEC will continue to explore opportunities to invest in additional school-age training and professional development that promote high quality before- and after-school care. Additionally, OEC Contracts with the Connecticut Network for Children and Youth to help build local coordinating entities for early childhood services, an initiative that is also funded in part by CT's Early Childhood Funders Collaborative. This assures that local planning efforts around child care include planning for school-age children.

Section 9: Family Outreach and Consumer Education (p.170)

9.3.6 Video training modules are not currently available on the OEC website. (1)

Section 10: Program Integrity and Accountability (p.182)

No comments for this section.

General Comments:

A webinar explaining the 204 page plan would be helpful for people to better understand the public comment process. (1)

Appendix A - Verbatim Transcripts

Section 1: CCDF Program Administration

Online comment via portal - respondent 1386 - All Our Kin

Section 1.3: All Our Kin appreciates the opportunity to offer comment on Connecticut's CCDF State Plan for FFY 2025-2027. Family child care (FCC) is a key part of developing a high-quality early care and education system that meets the needs of children and families. FCC educators have an invaluable perspective on the challenges of navigating state subsidy and welcome the opportunity to provide feedback. Therefore, we applaud the Office Of Early Childhood (OEC) for holding public information sessions to share more about the purpose and goals of the CCDF Plan, in addition to distributing a plan overview in English and Spanish. We ask the OEC to continue this approach to encouraging public comment from educators and parents, as they face the greatest barriers to participation. Additionally, we suggest that OEC partner with a limited number of family child care educators at least six months before the next plan is due. This group would advise OEC on content, strategies to inform FCC providers about the purpose of the plan, the best format and the timeline for releasing the draft and for eliciting meaningful public comment from a larger group of FCC providers.

Section 2: Child and Family Eligibility and Enrollment and Continuity of Care

Oral comment via 5/13 remote access - Care 4 Kids - Merrill Gay

Section 2.5: And the final thing, 'cause I know my time is almost up, is to say looking at the eligibility and continuity of care in section two, the fact that only 52% of children are renewed when they come up for redetermination just sort of sticks in my mind. And whether it's something that is required by the feds or not, I think it's something we need to look at more carefully to figure out why is there such a huge drop off and what can we do to fix that? Is that parents not submitting documents because they don't understand that they need to or is that -- what is going -- what's the disconnect there? And I'm sure I'll find more as I finish reading this, so I will write some comments and submit them. Thanks for this opportunity to talk.

Online comment via portal - respondent 1367

Section 2.2.2: I think it is essential to also include individuals that are pursuing a graduate degree such as a Masters.

Online comment via portal - respondent 1367

Section 2.5: The redetermination process needs to be easier. We also need to work on creating the app for Care4Kids.

Section 3: Child Care Affordability

Oral comment via 5/13 remote access - Care 4 Kids - Merrill Gay

Section 3.1.1: Section three about childcare affordability, which is on 37. Let me go back to there. Page 37. Let's get to page 37. This says that the expectation is that agencies would not charge families more than 7% of their income. And then when asked what do we do, we say we charge 10% of income. I know that that's based on our regulations and that House bill 5002 just passed that let's you replace your regulations with policies and procedures. So my hope is that you're going to change your policies and procedures to come into compliance with the federal law and reduce that parent co-pay to 7%. And so that would, you know, that's what I'm hoping is going to happen as you finalize your plan since you had to write this draft before the law passed.

Section 4: Parental Choice, Equal Access, Payment Rates, and Payment Practices

Oral comment via 5/13 remote access - CSEA Local 2001 - Adrean Rodriguez

Section 4.3.2: As for the rates chart that is in 4.3.2, they understand that the plan might not have requested rates for unlicensed providers, but those are rates that are not reflected in the plan. And after reviewing the Care 4 Kids rates and figuring out averages or if the numbers were figures that were in later years, I could not find something that matched the numbers that were in that chart. So I would just like to revisit and see where those numbers came from and how we're figuring out the numbers to fill in the chart for 4.3.2

Oral comment via 5/13 remote access - CSEA Local 2001 - Adrean Rodriguez

Section 4.2.2: And section 4.2.2, subsection D, there is a mention of the NAEYC accreditation being looked at as a high quality program, but there is no mention of the NASBE accreditation, which there is also a differential of 12.5%, and there is an SEIU ESF program. That program is mentioned later in the plan, but it is not referred to under this section.

Oral comment via 5/13 remote access - CSEA Local 2001 - Adrean Rodriguez

Section 4.3.2: There's also other areas in the plan that the unlicensed individuals, or as the document might refer to them as license exempt, are not being represented in the plan. And so the union would love an opportunity to continue to make sure that both licensed and unlicensed providers are being reflected in this plan.

Oral comment via 5/13 remote access - CSEA Local 2001 - Adrean Rodriguez

Section 4.3.3: There's some other areas that the overarching theme of what I'll mention is there are things that are included in the CBA with the union that are not reflected in the plan. One of those areas is section 4.3.3, subsection B5, where there is a 3% differential for the ECE degree. That is not reflected in the plan.

Oral comment via 5/13 remote access - Care 4 Kids - Merrill Gay

Section 4.1: I do want to go down to the section on -- section four, which is the payments to providers, and particularly to look at the chart that I just had up before I went looking for the last section that looks at the payment levels to providers by region and the types of -- we range from it looks to me like a high of 89% of market rate for family childcare for school aged children to a low of 20% for family childcare for preschool. And paying providers at 20% of the market rate is a real problem. I mean, I know I'm picking on the lowest one there, but for center based providers it's paying at the 41 st percentile of market rate for preschool. We're clearly underpaying at that level, which makes it hard for family child care providers to get children in, you know, it's already hard to compete against subsidized school readiness if you're in a school readiness community, but it's very difficult to run a family childcare business with just your three infants. You need to have some preschoolers or some after school kids to make it financially viable. And so having family childcare rates for Care 4 Kids that are so low that it depresses the market there. It makes it difficult for families to access care. I'm just -- I'm concerned that we're not paying enough there.

Oral comment via 5/13 remote access - Care 4 Kids - Merrill Gay

Section 4.4: And then the other section is about proactive payments, I think -- that the feds are now encouraging us to pay providers based on the way the market works. And I know that, you know, 25 years ago when I was paying for childcare, I paid a week in advance, not a month in arrears. And that's a change that we should be moving towards. Again, that was tied up in our old regulations that did it that way. But I hope that we can move to

move Care 4 Kids in the direction of emulating the market as far as what we're paying and how we're paying providers to make it more financially viable for providers to serve the children on Care 4 12 Kids.

Online comment via portal - respondent 1386 - All Our Kin

Section 4.1: We recognize the OEC's efforts to streamline the Care 4 Kids application process. The online Parent Portal and prescreening tool are a helpful resource for families. Unfortunately, several ongoing barriers make it challenging for programs, including family child care to participate in the subsidy. Currently, reimbursement rates reflect what the general population can afford to pay for child care services. This often does not align with what is required to meet health and safety standards and falls far below the cost of providing high-quality care. The disparity between the market rate and the true cost of care makes it difficult for programs to remain financially viable. Plus, processing delays have placed added financial strain on programs. We know that instead of turning families away, a number of educators allow parents to pay what they can while awaiting approval. Low reimbursement rates and processing delays coupled with the shortened retroactive payment window have forced family child care educators to reconsider accepting subsidy. These challenges are detrimental to parent choice as they diminish the pool of programs open to accepting Care 4 Kids. This is particularly troubling as home-based child care is uniquely well-positioned to serve infants and toddlers. Families deserve access to high-quality early care and education regardless of their socioeconomic status. Therefore, we ask that the OEC continue to explore increasing reimbursement rates in-line with the true cost of care. We also urge the state to institute presumptive eligibility as a way to provide relief to working families and close the gap between the time that parents apply for Care 4 Kids and when their application is processed. Several states have implemented presumptive eligibility policies without large cost hikes including Delaware, Maryland, Montana, and Wyoming.

Online comment via portal - respondent 1386 - All Our Kin

Section 4.3: In a 24-hour economy, there is a critical need for child care in the early morning, late evening, overnight, and on weekends, especially among lower-income families who often work multiple jobs or work in industries—such as retail, health, and food—that commonly require nontraditional hours. Increasing the subsidy rate for nontraditional hours may lead more family child care programs to offer greater schedule flexibility for families. We urge the OEC to adopt a differential rate for non-traditional hours to help expand access to care for families including those working outside standard business hours. (2) We are encouraged by the recurring increase to reimbursement rates through SFY 2026 for center-based and home-based providers. Low wages continue to drive early educators from the field, making it challenging for family child care owner operators to hire staff. United Way has reported that a worker shortage has left Connecticut with 40,000 unfilled child care slots. Anecdotally, we know that family child care educators choose not to expand the number of children in their care for fear of failing to maintain staffing ratios. Similarly, we've seen programs that struggle to hire and maintain assistants opt to serve fewer children than is allowed by licensed capacity in order to better manage child interactions and avoid burnout. The 11 percent increase in reimbursement rates will help to improve educator compensation and staff retention while bringing Connecticut in line with the federally recommended 75th percent of the market rate. However, reimbursement rates will continue to reflect what parents can afford even with the anticipated increase. When setting subsidy payment rates, the state should prioritize maximizing child care quality, access, and program sustainability. Therefore, we ask that the state continue to leverage CCDF funds towards aligning Care 4 Kids reimbursement rates with the true cost of providing high-quality care.

Online comment via portal - respondent 1386 - All Our Kin

Section 4.4: Family child care educators are committed to serving children and families throughout Connecticut. However, late payments and fluctuating wages make it difficult to maintain their businesses and offer much needed care. Family child care educators need subsidy payments that are timely, accurate, and tied to enrollment

in order to run stable, sustainable child care businesses. Program costs remain consistent, despite fluctuating attendance. By paying educators in advance and based on enrollment providers have the ability to improve their financial planning and budgeting. Throughout the Covid-19 pandemic the implementation of these policies proved to have a stabilizing effect. Child Care Aware of America analyzed enrollment and payment data and found that reimbursing providers based on enrollment helped programs to keep their doors open. While substantial funding is needed to help increase reimbursement rates, small but impactful changes can be made to help child care professionals in the short term. All Our Kin encourages the OEC to leverage CCDF funds to implement prospective and enrollment-based payment.

Section 5: Health and Safety of Child Care Settings

Oral comment via 5/13 remote access - CSEA Local 2001 - Adrean Rodriguez

Section 5.1: For health and safety on section 5, there are some ratios that are missing for licensed providers and also for license exempt providers or relative care. And so those are just some sections that I would recommend that we revisit.

Online comment via portal - respondent 1342

Section 5.2: It is unclear what the evidence base is for changing the ratio and group size for 2-year-olds. The proposed weakening of CT ratio and group size for this age group is inconsistent with national health and safety standards which are evidence-based. It is unclear where 1-year-olds fall in this proposal for ratio and group size based on age as they do not fall into either category - unless I am reading this wrong. It is unfortunate that the weakening of CT standards is taking place without consideration for voiced concern by the public and professional communities and without deliberation by the Regulations Review Committee, unless I am misunderstanding and the stated ratio and group size for 2-year-olds is proposed and not stated as adopted already. Perhaps it was a mistake to remove child care regulations from DPH since the need for such health and safety standards based on evidence from the health field for the youngest of our children may not be fully understood or valued by those at OEC. I hope CT OEC will review the stated concerns.

Online comment via portal - respondent 1386 - All Our Kin

Section 5.6: Family child care educators are committed to continuous learning. As the OEC prepares to extend professional development requirements to FCC educators and staff regardless of their participation with Care 4 Kids, we urge the OEC to ensure that professional development is both available and accessible to all educators. In order to effectively engage family child care educators in professional development, offerings must coincide with their real lives. This means holding trainings at night and on weekends and in the communities where providers live. Additionally, we hope that the OEC will keep in mind ongoing barriers to participation by offering trainings in languages that providers speak and read, that are provided at low or no-cost.

Section 6: Support for a Skilled, Qualified, and Compensated Child Care Workforce

Oral comment via 5/13 remote access - CSEA Local 2001 - Adrean Rodriguez

Section 6.1.1.c: And then just to jump away from section four and go down to some sections on health and safety. In 6.1.1c there is a healthcare work group that is established as part of the collective bargaining agreement. We have met once and we figured out a little bit of a plan as to move forward. So aside from only mentioning the Access Health CT as the Connecticut Marketplace, also making some reference that there is a health group that is tasked with generating a survey and conducting a report, I think would be important to include, and for health and safety -- I'm sorry -- that was not health and safety. That was development.

Online comment via portal - respondent 1386 - All Our Kin

Section 6.1: The OEC can help to improve the recruitment, retention, compensation, and well-being of early educators by increasing access to benefits and rewarding continued professional learning. (1) Early childhood professionals deserve a living wage and comprehensive benefits that support their overall health. Yet, as small business owners, family child care educators often lack access to important supports, such as health insurance for themselves and their staff. Several states including Washington, New Mexico, and California have taken steps to invest in healthcare access. We are encouraged by the OEC's efforts to introduce Service Navigators to help educators better maneuver the state's health insurance marketplace. But we believe the state should go a step further. The Covid-19 pandemic helped to spotlight the importance of educator's physical and emotional well-being. When educators care for themselves it strengthens their ability to educate and nurture others. We applaud the OEC for recognizing educator's needs and offering support to the workforce through monthly webinars related to mental health. We encourage the OEC to continue to invest in provider mental health by providing resources to educators via the existing Staffed Family Child Care Networks. We believe that adequate health care coverage is a determining factor in access to critical mental health supports. Therefore, we urge the state to commit to no-cost comprehensive health insurance for family child care providers and their assistants. (2) We support providing bonuses directly to staff as a key strategy for improving educator retention. Early childhood professionals want to know that investing in their education will directly correlate to their professional success and compensation. We believe that the Qualified Workforce Incentive is a meaningful way to acknowledge the achievement of formal early childhood education. However, we are disappointed that family child care educators do not currently qualify for this incentive based on the standing contract agreement between the State of CT and CSEA-SEIU. We urge the state to find a pathway to offer this bonus to family child care educators, as the current union contract does not recognize formal education beyond a CDA. Home-based and center-based child care programs deserve recognition for furthering their knowledge of early childhood through formal education. (3) We appreciate that the OEC is taking steps to address educator compensation and simplify the existing career pathways. While the OEC proposed early childhood education compensation schedule is largely aspirational we'd like to express concern over how the OEC plan's to leverage the salary scale alongside NAEYC's Unifying Framework as a means to set compensation levels for the field more broadly. We urge the OEC to assess the equity impact of the Unifying Framework and associated compensation schedule, including whether the adoption of the UF supports the recruitment and retention of a more diverse workforce. We recommend that before adopting the UF the OEC convene a group of family child care educators to seek feedback on implementation.

Section 7: Quality Improvement Activities

Online comment via portal - respondent 1313

Section 7.2.1: Across Connecticut 37% of students served with CCDF Funds are school aged, and 60% of children are waiting for access to high quality after school programs. Afterschool and summer programs matter for youth development and equity as well as for their care giver's ability to participate in full-time work. School-age youth spend 80% of their time across a year outside of the traditional school setting. Quality programs sustain and advance the academic and social gains of strong early learning environments. Yet very little of the quality set-aside funds are spent on quality improvement activities specifically for programs serving school-age children. We suggest that you edit the language in section 7.2.1.b.i. to remedy this with the following addition: Future investments may include building sustainable coaching and mentoring practices within programs, and further collaboration with the Connecticut Network for Children and Youth to provide free and low-cost training specifically for school-age programs aligned to best practice for this age group.

Online comment via portal - respondent 1386 - All Our Kin

Section 7.2: We commend the OEC for continuing to emphasize the importance of Staffed Family Child Care Networks as a quality support. Research has shown that in addition to increasing the supply and quality of family child care in the communities they serve, networks that provide business training have a positive effect on earnings, educational attainment, and financial sustainability. We recommend that the OEC continue to use CCDF funds to invest in high-touch, high-impact models for professional learning, coaching, and business training to ensure educators throughout the state have access to key resources and assistance. We're encouraged that the state is leveraging networks to support accreditation by providing Communities of Practice on the topic. We urge the state to invest in one-on-one coaching to provide meaningful support to educators seeking NAFCC accreditation. Consequently, coaches should have a deep respect and expertise of family child care, child development, and adult learning. Data has shown that utilizing coaching to move providers through accreditation is an effective strategy for increasing quality in family child care. NAFCC accreditation is an extended and expensive process. We urge the OEC to continue covering the cost of accreditation to ensure it does not become cost-prohibitive. (2) Lastly, we applaud the state for developing a Quality Improvement System that is aligned with licensing standards and national accreditation. We recommend collaborating with family child care educators to further understand their experience with Elevate in addition to their ongoing professional development needs.

Section 8: Lead Agency Coordination and Partnerships to Support Service Delivery

Online comment via portal - respondent 1313

Section 8.1.1: The Connecticut After School Network changed its name since the last plan, and we suggest editing section 8.1.1.o. in this way: The OEC continues to work with the Connecticut Network for Children and Youth, the statewide afterschool network, to address the pressing issue of ensuring quality in afterschool programs. The Connecticut Network for Children and Youth provides a variety of conferences, fee-for-service trainings, and consultation that meets providers where they are and helps to assess programs' progress made towards goals. The OEC will continue to explore opportunities to invest in additional school-age training and professional development that promote high quality before- and after-school care. Additionally, OEC Contracts with the Connecticut Network for Children and Youth to help build local coordinating entities for early childhood services, an initiative that is also funded in part by CT's Early Childhood Funders Collaborative. This assures that local planning efforts around child care include planning for school-age children.

Section 9: Family Outreach and Consumer Education

Online comment via portal - respondent 1084

Section 9.3.6: The plan describes in 9.3.6 the online learning modules that were created with the Center for Early Childhood Education (CECE) several years back: (1) OEC, in collaboration with Eastern Connecticut State University, has developed a series of video rich training modules for home visitors to improve their knowledge and skills in serving young children and families. These videos are posted on the Center of Early Childhood's website and are available to the public. This plan erroneously indicates that they are being made available. These modules were posted for a while utilizing ECSU's Blackboard account - in a free space called CourseSites, which ceased to exist by 2021. As the project's manager at the time, I uploaded all of those modules into the OEC's Canvas LMS. To my knowledge, those resources have never been made available to the public. On several occasions, I have reached out to the OEC managers and inquired about their status, even offering to assist with the tasks needed to make them available. There are many home visitors across the state who would benefit from the information, strategies, resources and video interviews with home visitors who shared their expertise. The modules also contain resources

to support home visitors' self-care, as well as facilitator guides to assist trainers and/or supervisors to use the materials to engage professional learning more deeply.

Section 10: Program Integrity and Accountability

No comments for this section.

Other/General comment

Oral comment via 5/13 remote access - Care 4 Kids - Merrill Gay

General comment: As a general comment that a 204 page plan is more than most people will voluntarily dig into and that it would be very helpful if we could, in the future, do a webinar about what's the plan, what are the sections, what's changing, so that people have some idea about what they're commenting on. So, that's just you know, it's always easier for me to tell you what would be good than for you to actually do it, but that would be helpful.

Appendix B - Schedule of Public Forums

April 26, 2024 through May 24, 2024

Opportunity for Public Comment on Connecticut's Draft 2025-2027 CCDF Plan via Online portal

May 13, 2024 1:00 PM

Opportunity for Public Comment on Connecticut's Draft 2025-2027 CCDF Plan via Remote Access