December 2, 2019

Andrew Williams
Office of Child Care
Administration for Children and Families
U.S. Department of Health and Human Services
330 C Street SW
Washington, DC 20201

RE: Administration for Children and Families (ACF) Notice: Improving Access to Affordable, High Quality Child Care: Request for Information (RIN 0970-ZA15)

Dear Mr. Williams:

The National Association for the Education of Young Children (NAEYC) appreciates this opportunity to provide comments in response to the Administration for Children and Families (ACF's) request for information (RFI) regarding improving access to high quality, affordable child care. For more than 90 years, and with more than 60,000 members, including early childhood educators, advocates, and allies across the country, NAEYC's mission has been to increase access to high-quality, developmentally-appropriate early childhood education for all children birth through age 8. As such, we, together with the 52 Affiliates who are part of our network, appreciate ACF's interest in and commitment to addressing the "affordability and access crisis of child care in the U.S., without compromising on quality."

Decades of research have confirmed that the benefits of investing in high-quality early childhood education are clear and extensive—for children, families, businesses, and society at large. At the same time, decades of underfunding in early childhood education have made it equally clear that significant and sustained public investments are needed to improve quality and increase supply in a broken market where neither parents nor providers can shoulder the burden of the cost of care.

States' utilization of the recent bipartisan federal child care funding increase provides evidence that we can collectively improve access to affordable child care, while improving quality and protecting children's safety. We strongly encourage the Administration to focus its solutions to increasing equitable access to affordable, high-quality child care on increasing investments, particularly those that are targeted towards the early childhood education workforce across all settings, which is the key to simultaneously increasing supply and increasing quality.

In response to the specific questions in the RFI, NAEYC provides the following comments:

A1. Building the Supply of High-Quality Child Care

ACF accurately describes the challenges of supply in our communities, as families are struggling to access high-quality child care in both our rural and urban areas. However, the major barriers preventing child care providers from entering the market—and the primary issues driving providers away from it—are the untenably low payment rates and lack of compensation that providers receive for caring for low-income children. Indeed, while ACF asks us to address "cultivating the child care workforce" in a separate question (A3), the ability to build the supply of high-quality child care is directly correlated with the ability to cultivate the child care workforce. In fact, investing in education and compensation of the child care workforce is the best supply-building strategy available to policymakers. It is why so many states are using the increased federal CCDBG funds to raise child care payments to providers.[1] As a country, we need more providers to be able to afford to accept children receiving subsidies. If states do not increase the supply of child care by increasing provider payment rates, even those one in six eligible families who actually have a child care subsidy won't be able to find a child care provider to accept them.

In addition to fundamental investments in the education and compensation of the current and future workforce, NAEYC, along with our network of Affiliates across the country, encourage ACF to explore, incentivize, and fund strategies that support supply-building via additional workforce supports. These may include options such as targeted payment and tiered reimbursement rate increases in rural areas, and investments in family child care networks and shared services models that allow providers to direct funds away from administrative functions and towards the drivers of supply and quality.

A3. Cultivating the Child Care Workforce

Investing, elevating, and cultivating an effective, diverse, well-prepared and well-compensated workforce is the key to all sustainable solutions to the child care crisis. We recommend that ACF review the recommendations emerging from the Power to the Profession initiative, in which NAEYC and fourteen other national organizations have come together, with the support of tens of thousands of educators and stakeholders across the nation, to create a unified framework for the early childhood education profession addressing career pathways, preparation, competencies, responsibilities, and compensation.[2] These recommendations both support the existing workforce, and attend to the recruitment and retention of prospective early childhood educators, who are needed to grow the workforce to meet the demand of parents, businesses, and the economy. ACF, in partnership with the Departments of Education and Labor as well as Congress, have tremendous opportunities to cultivate the child care workforce, particularly by supporting their professional preparation and ongoing professional development, and by supporting not only providers but also institutions of higher education and employers in creating the conditions for the workforce to thrive, so that the children and families they serve can thrive. This includes, first and foremost, providing necessary financing to address the true cost of quality, which includes adequate compensation for the profession as well as comprehensive

[1] See www.stateofchildcare.org for more information and sources on CCDBG and federal spending.
[2] See www.powertotheprofession.org for more information on recommendations for the future of the early childhood education workforce and needed federal actions to support a unified, effective, well-prepared, and well-compensated early childhood education profession.

supports for early childhood educators as they acquire the needed knowledge, skills, and competencies to deliver on the promise of early learning.

On that note, and to ACF's specific questions, as early childhood educators are frequently acquiring these competencies in the context of earning degrees and credentials while working, recognized apprenticeships and other short-term programs can be meaningful. It is crucial that early childhood education is recognized as a high-need field, and that these programs are stackable, portable, credit-bearing, and designed to articulate into pathways towards recognized credentials and degrees, while *resulting in increased compensation.* Early childhood educators working across all settings also need specific and comprehensive supports to earn additional educational qualifications; recommendations range from increasing the use of credit for prior learning (CPL) and prior learning assessments (PLA) to providing equal access to comprehensive scholarships and loan forgiveness for educators working in all settings. We recommend the new "Increasing Qualifications, Centering Equity" paper from NAEYC, written in partnership with The Education Trust, for more information and recommendations on supporting the workforce as educational qualifications are increasingly required.

A2. Improving Child Care Regulations

As educators and advocates for high-quality early childhood education, we must be clear that any effort to lower the bar on child care by rolling back regulations in an attempt to solve the challenges of supply is misguided and will lead parents to choose between safe child care and affordable child care, compromising quality and harming children and families in the short and long term. As other organizations and researchers have illuminated, there is no evidence to suggest a correlation between child care supply and the regulatory environment; to the contrary, it has long been clear that states with more effective regulatory structures have a greater supply of higher quality programs (and that children who attend higher quality programs consistently demonstrate better outcomes).[3] The question, therefore, must focus on how we can collectively help more providers meet critical regulations that protect health and safety and advance children's learning, and may include the implementation of a set of criteria, agreed-upon by the field, which drive quality in early learning and professional development systems across states and settings.

Indeed, as a federal-state partnership, CCDBG allots significant flexibility to the states in terms of their regulatory decision-making, at the same time that the bipartisan reauthorization set clear floors and requirements at the federal level as well, in a number of areas. One area where ACF could contribute to states' positive regulatory decision-making could be to encourage and/or otherwise incentivize states to remove restrictions that prevent the state from paying provider rates higher than the lowest rates charged to private-pay parents. These types of restrictions have resulted in intended consequences for parents, providers, and the state, and we encourage ACF to work within its purview to address them.

[3] Licensing and Public Regulation of Early Childhood Programs, NAEYC. 1998. Retrieved at: https://www.naeyc.org/sites/default/files/globally-shared/downloads/PDFs/resources/position-statements/PSLIC98.PDF

A4. Developing Better Child Care Business Models.

For the many small-business owners in family and community-based child care, professional development that supports them to successfully build their business is essential. ACF should work with Congress and states to ensure that resources and supports, including increased rural broadband access and access to financing for renovations, as well as start-up building costs, are provided to help early childhood businesses become stronger, more financially sound, and better equipped to offer high-quality early learning opportunities in order to ensure the long-term success of a mixed-delivery model in early childhood education.

In addition, in the introduction to this question, ACF notes that child care providers are needing to address the loss of preschool-aged slots in the context of expansion of public pre-kindergarten programs. This is a reality that many providers across states are confronting; however, it does not have to be the case. Supporting child care providers across all settings with comprehensive scholarships, loan forgiveness, and other innovations such as substitute pools, in order to help them earn the degrees and credentials required by state funded pre-k programs allows for a robust mixed-delivery system that meets the needs of all children and families.

B1. Transforming Financing of Child Care and Early Education

The child care and early learning systems are and have been deeply underfunded; in order to achieve our shared goals of increased access to affordable, high-quality child care, the financing of high-quality early childhood education will have to change and grow even as we build on the strong foundation of what currently exists. As the 2017 GAO report identifies, the set of early childhood education programs at the federal level are complementary to one another, not duplicative. It is time to fully fund these programs, including CCDBG, Head Start, and Early Head Start, to ensure that all children have access to high-quality early childhood education at scale, inclusive of all states and settings. Local, state, and federal governments will each have to embrace significant increases in investment, recognizing the individual and societal benefits that accrue when families with young children have equitable access to high-quality early learning settings with supported, skilled, and knowledgeable early childhood educators.

NAEYC appreciates the opportunity to comment on this request for information, and welcomes further questions as we work collectively to invest in a high-quality early childhood education system that is affordable for families, and supports all children, families, educators, businesses, and our economy.

Sincerely,

Lauren Hogan

Lauren Hogan
Managing Director, Policy and Professional Advancement