



Key Information to Support Next Steps for CCDF Administrators in Preparing the FY 2022–2024 CCDF Plan

For purposes of simplicity and clarity, the specific provisions of applicable laws and rules printed herein are sometimes paraphrases of, or excerpts and incomplete quotations from, the full text. The Lead Agency acknowledges its responsibility to adhere to the applicable laws regardless of these modifications. Lead Agencies are to follow Office of Child Care instructions for final details on how and when to submit the CCDF Plan.

Deadlines and Effective Dates

Lead Agencies must submit their CCDF Plans for Office of Child Care review no later than June 30, 2021. Upon approval, Plans will be effective for the FFY 2022-2024 (October 1, 2021, through September 30, 2024).

Step 1. Review Your Current CCDF Plan, Including Waivers and Amendments, in ACF-118

The current Plan was developed to align with the Child Care and Development Block Grant Act of 2014. The CCDF final rule added clarifications to the law to provide more specific guidance on what each provision requires.

Step 2. Review Plan Requirements and Consider Possible Waivers

Review the requirements, including those listed below, at <https://www.ecfr.gov/cgi-bin/text-idx?SID=4f7ade0a312b92f614ef180b7bbbec06&mc=true&node=pt45.1.98&rgn=div5>:

- ◆ Lead Agency responsibilities (§ 98.10)
- ◆ Plan process (§ 98.14)
- ◆ Assurances and certifications (§ 98.15)
- ◆ Description of Plan provisions (§ 98.16)

The Office of Child Care (OCC) recognizes that the COVID-19 pandemic has significantly impacted child care systems across the country. As a result, the OCC, the Administration for Children and Families (ACF), and U.S. Department of Health and Human Services (HHS) are committed to granting waivers (of up to one year) for a Lead Agency to complete the Market Rate Survey and/or an ACF pre-approved alternative methodology. Waivers



may also be granted for those Lead Agencies needing additional time to complete a narrow cost analysis. All Lead Agencies may request one, both, all three, or none of these waivers.

Step 3. Identify and Work with Partners

Lead Agencies must consult with specified partners when developing the Plan and coordinating the provision of child care services for different activities. These partnerships are summarized below:

Partners Required for Consultation in the Development of the Plan

- ◆ Appropriate representatives of general purpose local government (§ 98.12(b))
- ◆ State Advisory Council on Early Childhood Education and Care or similar coordinating body (State Advisory Council) (§ 98.15(b)(1))
- ◆ Indian tribes or tribal organizations within the state—done in a timely manner and at the option of the Indian tribes (§ 98.10(f))

Partners Required for Consultation on Other CCDF Activities

- ◆ **Market rate survey (MRS) or alternative methodology** – Prior to conducting an MRS or alternative methodology, the Lead Agency must consult with the State Advisory Council or similar coordinating body; local child care program administrators; local child care resource and referral agencies; other appropriate entities; and organizations representing child care caregivers, teachers, and directors (§ 98.45(e)). The Lead Agency may consult with these partners when determining whether waivers will be requested for the MRS, the alternative methodology and/or the narrow cost analysis.
- ◆ **Training and professional development requirements** – The Lead Agency must consult with the State Advisory Council or similar coordinating body on the development of its framework for training; professional development; and postsecondary education for caregivers, teachers, and directors (§ 98.44(a)(1)).
- ◆ **Early learning and developmental guidelines** – The state must consult with the state educational agency and the State Advisory Council or similar coordinating body along with child development and content experts on the implementation of early learning and developmental guidelines (§ 98.15(a)(9)(ii)).
- ◆ **Grace period to comply with immunization requirements for children experiencing homelessness and children in foster care** – Lead Agencies must consult with the state or territory health agency when establishing the length of the grace period for complying with immunization requirements for homeless children and children in foster families (§ 98.41(a)(1)(i)(C)(1)).

Partners Required for Coordination of Services

Plan to get input before writing the plan by having meetings across the state with partners and stakeholders. Use different board or council meetings as opportunities to highlight various topic areas that are identified in the Preprint; first share what is currently being done; describe requirements; and then ask for input, thoughts, or ideas on what is working well, what is needed, and what might not be needed anymore. Required partners include (§ 98.14):

- ◆ State Advisory Council or similar coordinating body (pursuant to 642B (b)(I)(A)(i) of the Head Start Act)
- ◆ Indian tribes or tribal organizations, at the option of individual tribes



- ◆ State or territory agency or agencies responsible for programs for children with special needs, including early intervention programs authorized under the Individuals with Disabilities Education Act (Part C for infants and toddlers and Section 619 for preschool-age children)
- ◆ State or territory office or director for Head Start and state collaboration
- ◆ State agency responsible for public health, including the agency responsible for immunizations
- ◆ State agency responsible for employment services and workforce development
- ◆ State or territory agency responsible for public education, including prekindergarten
- ◆ State or territory agency responsible for child care licensing
- ◆ State or territory agency responsible for Child and Adult Care Food Program and other relevant nutrition programs
- ◆ McKinney-Vento State Coordinators for Homeless Education and other agencies providing services for children experiencing homelessness and, to the extent practical, local McKinney-Vento liaisons
- ◆ State or territory agency responsible for employment services or workforce development
- ◆ State or territory agency responsible for Temporary Assistance for Needy Families
- ◆ Agency responsible for Medicaid and the State Children's Health Insurance Program
- ◆ State or territory agency responsible for mental health
- ◆ Child care resource and referral agencies and child care consumer education organizations
- ◆ Providers of early childhood education training and professional development
- ◆ Statewide afterschool network or other coordinating entity for out-of-school-time care (if applicable)
- ◆ Agency responsible for emergency management and response

Step 4. Develop Your Timeline to Cover Required Activities

What activities do you need to complete, and how much time will you need to meet the following requirements?

Market Rate Survey or ACF Pre-Approved Alternative Methodology Requirements

This would include time for the following:

- ◆ Consulting with 1) the State Advisory Council; local child care program administrators; local child care resource and referral agencies; other appropriate entities; and 2) organizations representing caregivers, teachers, and directors prior to developing and conducting the MRS or ACF pre-approved alternative methodology
- ◆ Giving the Administration for Children and Families time to review and approve an alternative methodology, if the Lead Agency is considering using an alternative methodology instead of an MRS
- ◆ Developing and conducting the MRS or alternative methodology no earlier than July 1, 2019 (No earlier than 2 years before the date of submission for the Plan)



- ◆ Preparing a detailed report with the results of the MRS or alternative methodology, describing how the Lead Agency took into consideration the views and comments by the public in the report, and making the report widely available within 30 days of its completion

Narrow Cost Analysis

Regardless of whether Lead Agencies conduct a market rate survey or an alternative methodology, they are required to analyze the estimated cost of care (including any relevant variation by geographic location, category of provider, or age of child).

- ◆ The cost of child care providers' implementation of health safety, quality, and staffing requirements
- ◆ The cost of high-quality care, as defined by the Lead Agency using a quality rating and improvement system or other system of quality indicators, at each level of quality

Public Hearing Requirements

This would include time for the following:

- ◆ Providing notice of the public hearing at least 20 calendar days prior to the public hearing or longer if necessary, per Lead Agency process
- ◆ Conducting the public hearing no earlier than January 1, 2021
- ◆ Making the content of the draft Plan available to the public in advance of the hearing

Internal Review and Approval of Your CCDF Plan

- ◆ Each Lead Agency has unique internal processes for approval, please allow for sufficient time to navigate these.
- ◆ Allow sufficient time for submission into the ACF-118 system.