



June 30, 2015

Administration for Children and Families
Office of Planning, Research and Evaluation
370 L'Enfant Promenade SW
Washington, DC 20447

Attn: Robert Sargis, ACF Reports Clearance Officer

**RE: Child Care Quarterly Case Record Report – ACF-801
Child Care and Development Fund Annual Aggregate Report – ACF-800**

Dear Mr. Sargis:

Thank you for the opportunity to provide feedback on proposed changes to the collection of information under the Child Care and Development Fund (CCDF) Annual Aggregate Report (ACF-800) and Quarterly Case Record Report (ACF-801). The Child Care and Development Block Grant (CCDBG) is a critically important two-generational support for our country's poor children and their families. The data collected about the program's participants is at the core of informed analysis and decisions around the quality of care and policies regarding subsidized child care for the nation's vulnerable children. The Center for Law and Social Policy (CLASP) is a national, nonpartisan, anti-poverty organization advancing policy solutions that work for low-income people. We lift up the voices of poor and low-income children, families, and individuals, equip advocates with strategies that work, and help public officials put good ideas into practice. Our Child Care and Early Education team works to advance federal and state policies that increase the number of low-income children with access to high-quality child care and early education that promotes positive child development and meets the needs of working parents.

Our comments draw on the work of experts at CLASP who have been deeply involved in CCDBG policy and data analysis for decades and at many different levels, including as a key stakeholder organization in the most recent 2014 Congressional reauthorization. Our expertise in data collection and administrative policy related to CCDBG spans all levels of the organization, including CLASP's Executive Director, Olivia Golden, who served as Commissioner for Children, Youth, and Families and then as Assistant Secretary for Children and Families at the U.S. Department of Health and Human Services from 1993 to 2001.

CLASP commends the Administration for Children and Families (ACF) for their efforts to expand the data that is collected by states, as well as improve its quality. This is particularly timely and relevant given the reauthorization of CCDBG in November 2014. The CCDBG Act

of 2014 is an important step forward for improving the health, safety, and quality of child care. It makes crucial improvements to the program by allowing children to have more sustained access to child care assistance, supporting greater continuity of care, and helping parents stay and move up in their jobs. In addition, it requires states to improve access for particular populations of children and families who are most in need. Achieving a new vision of child care for low-income children—one in which child care is safer, better quality, and more affordable for parents—cannot be fully realized without adequate, high-quality data collection that tracks states' progress in reaching families and the quality of care children are receiving.

CLASP particularly commends the administration for proposing the collection of additional data elements by states, including requiring states to:

- Report family homelessness status;
- Collect whether children are receiving disability service;
- Collect families' military status; and
- Collect family and provider zip codes.

CLASP also commends the administration for strengthening a number of important data elements that were previously collected, including:

- Report data representing child care provider quality, using quality rating information or other approved measures;
- Document and report on consumer education efforts;
- Report the number of child fatalities occurring while children are in care; and
- Report the date of most recent program inspection for every provider serving a child under CCDF.

Several of these new requirements will help states shape their policies in response to new provisions of CCDF, and will provide important data to others who are analyzing impact of the CCDBG Reauthorization Law. For example, CLASP believes that capturing family homeless status and children with disabilities will help states ensure that these particularly vulnerable populations are being reached as required by the reauthorization. Additionally, tracking the quality of child care providers is important for accountability and helpful for parental choice, as well as child development and safety. It will be important, however, to continue to evaluate how accurately the measures suggested under this provision reflect the actual quality of care.

CLASP acknowledges that states already report a number of data points through the ACF-800 and ACF-801 that are not yet publicly available. In an effort to improve transparency and accountability, CLASP recommends that ACF make available these data points in ways that are useful to states, advocates and policymakers. For example, states could use the data on family income that is already collected to make the following information from the ACF-800 publicly available:

- *Calculate and report poverty status.* Monthly family income is currently collected through the ACF-801; therefore, the calculation and reporting of the poverty status of the

family will be a low-burden addition. This new data element is needed in order to report on the additional indicators CLASP proposes for the ACF-800 and ACF-801.

- *Poverty status.* Report the number of families receiving child care assistance living at or below 50% (deep poverty) and 100%, of the Federal Poverty Line (FPL), as well as, those families living above the FPL. This data will provide clarity on the number of families in deep poverty and poverty, as well as above poverty who still meet the income-eligibility requirements for receiving subsidies.
- *Poverty status by category/type of child care.* Report the number of children receiving child care assistance living at or below 50% and 100% of FPL in total as well as by category/type of child care. This data will allow states, researchers, and other stakeholders to better understand the types of child care settings that families in deep poverty, poverty, and slightly above poverty are choosing to access with their child care subsidy.

CLASP recommends that the changes to the administrative data reporting requirements for CCDF also include the following additional indicators, which will further strengthen the CCDF administrative data statistics that are compiled and reported annually through ACF's Office of Child Care (OCC). The proposed additions will help states, researchers, and other stakeholders to better understand the diversity of participants in programs receiving CCDF funds, and with improved measures of quality across the programs, this will allow states to identify underserved populations and target resources most effectively.

Additional indicators to be reported on the ACF-801 include:

- *Report each child's complete racial/ethnic background.* The ACF-801 currently collects data on the race and ethnicity of children receiving child care assistance. However, currently when the data is aggregated by ACF, the number of children of each specific race is reported separately from the number of children who are Hispanic or Latino. CLASP is committed to reducing racial disparities in access to important supports like child care assistance, and in doing that work has found that ability to identify patterns of racial disparities in access is limited by the form in which data is currently reported. CLASP proposes that the complete racial/ethnic background for children be reported in order to best understand the racial/ethnic background of the children receiving child care subsidy. For instance, under current reporting requirements, if a child's race is identified as White and ethnicity is identified as Hispanic or Latino, the child would be counted and reported separately as "White" and "Hispanic or Latino." However, the proposed change would no longer keep the racial and ethnic background of the child separate, and would therefore report that the child is "White, Hispanic or Latino." This distinction is important in order to understand the complete racial and ethnic background of the children receiving child care subsidies, as there is a distinction in a child who is White, Non-Hispanic from one who is White, Hispanic.
- *Report poverty status of children by a child's complete racial/ethnic background.* Utilizing the proposed additional data elements as described above, CLASP proposes reporting on the number of children in deep poverty, poverty, and slightly above poverty of each particular racial/ethnic background. This data element will allow states, researchers, and other stakeholders to determine how well children and families from

different racial and ethnic backgrounds and varying income levels can access child care assistance. This information will allow states to better target resources towards potentially underserved populations as well as identify disparities in access amongst families of different racial and ethnic backgrounds.

- *Report category/type of child care accessed through subsidy by complete racial/ethnic background.* Utilizing the proposed additional data elements as described above, CLASP proposes reporting on the number of children attending each category/type of child care setting of each particular racial/ethnic background can be reported. This data element would allow states, researchers, and other stakeholders a better understanding of the ways in which particular child care settings are being accessed and utilized by families of different racial/ethnic backgrounds.
- *Report quality of child care providers accessed by poverty status.* Utilizing the proposed additional data elements as described above, as well as those proposed by OCC regarding quality of child care providers, CLASP proposes reporting on the number of children in deep poverty, poverty, and slightly above poverty accessing child care providers of differing levels of quality. This data element will allow states, researchers, and stakeholders to determine the degree to which children of varying income levels access and utilize lower or higher quality child care providers, reflecting the CCDBG policy goal of increasing access to high quality child care for the lowest income children.
- *Report quality of child care providers accessed by a child's complete racial/ethnic background.* Utilizing the proposed additional data elements as described above, as well as those proposed by OCC regarding quality of child care providers, CLASP proposes reporting on the number of children with different racial/ethnic backgrounds who are accessing child care providers of differing levels of quality. This data element will allow states, researchers, and stakeholders to determine if children from different racial and ethnic backgrounds are accessing lower or higher quality child care providers.
- *Language.* CLASP proposes to add a new data element in order to collect data on the primary language spoken in the home as well as if the child is an English Language Learner (ELL) or Dual Language Learner (DLL). This new data indicator will help states, researchers, and other stakeholders track the number of children being served through CCDF that may have language needs which need to be properly addressed by the child care options available in their area.

The availability of this data through the CCDF aggregate data statistics—available on a preliminary and final estimate fiscal year basis—will allow state administrators, researchers evaluating the CCDF program, and other stakeholders with the opportunity to better understand the children and families who receive child care assistance, as well as any gaps in access to quality child care among diverse groups of children. In an effort to fill this gap in knowledge, and as a thought-leader within the child care subsidy arena, CLASP will continue to research ways CCDF administrative data can be utilized to conduct analyses in order to increase our understanding of the extent to which federal and state-funded child care and early education programs are reaching children and families in need.

Thank you again for the opportunity to provide comments on the proposed changes and clarifications in the reporting requirements for the ACF-800 and ACF-801. We hope these comments are helpful, and we would be delighted to offer further suggestions on relevant

research and policy opportunities at your convenience. Please contact Christine Johnson-Staub at cjohnsonstaub@clasp.org if we can provide any additional information.

Sincerely,

Christine Johnson-Staub, Interim Director, Child Care and Early Education
Stephanie Schmit, Senior Policy Analyst, Child Care and Early Education
Christina Walker, Policy Analyst, Child Care and Early Education