

Administration for Children and Families  
Office of Child Care  
330 C Street, S.W.  
Washington, DC 20201

**RE: Comments on “Proposed Information Collection Activity; ACF-800: Child Care and Development Fund (CCDF) Annual Aggregate Report (Office of Management and Budget #0970-0150)”**

The Center for Law and Social Policy (CLASP) is grateful for the opportunity to comment on the recent notice of “Proposed Information Collection Activity; ACF-800: Child Care and Development Fund (CCDF) Annual Aggregate Report (Office of Management and Budget #0970-0150).” CLASP is a national, nonpartisan nonprofit advancing anti-poverty policy solutions that disrupt structural and systemic racism and sexism and remove barriers blocking people from economic security and opportunity. We work at the federal and state levels, supporting policy and practice that makes a difference in the lives of people living in conditions of poverty. On child care and early education, CLASP works at the federal and state levels to bring high-quality analysis grounded in data and on-the-ground experience, effective advocacy, and hands-on technical assistance. We work directly with State CCDF Administrators and advocates to support their efforts to improve access to child care at the state level. CLASP commends the Office of Child Care (OCC) and the Administration for Children and Families (ACF) for seeking ways to ensure the CCDF Annual Aggregate Report includes a broad range of reporting areas to show how State and Territory Lead Agencies are assisting families in addressing child care needs as well as meeting the 2024 CCDF Final Rule requirements and recommendations.

CLASP cares deeply about data equity and the use of data to inform advocacy and awareness of program implementation and trends. CLASP utilizes the publicly available data from the ACF-800 form each year to analyze program reach and assess trends to support programs and advocacy for additional resources and support. To this point, **we urge OCC to publish as much of the CCDF Annual Aggregate Report data collected to the public, including the areas proposed in this proposed information collection activity, as possible.** This data is crucial for understanding the impact of CCDF, informing advocates and program administrators, creating messaging to policymakers, and identifying areas of potential technical assistance needs across states. The feedback in this document is not comprehensive and focuses only on areas that either impact our work or where we hold the expertise necessary to appropriately comment.

CLASP specifically comments on the following areas in the proposed information collection activity:

**Presumptive Eligibility**

- CLASP supports the inclusion of questions regarding presumptive eligibility. We have [advocated](#) for presumptive eligibility policies as we know that they can increase access by providing immediate care, reducing the wait time for families to receive subsidies, and

lessening the struggle with the verification process. While presumptive eligibility is not mandatory in the 2024 CCDF Final Rule, we expect to see more states put this policy into practice. By collecting the proposed information from states who are implementing the policy, there will be more clarity on the reach of the policy and uptake of the presumptive eligibility process by families. It may provide valuable data to states about how they can improve their policies and support states who are exploring implementing the policy to learn and be informed by the work of other states. We will know how many families were deemed eligible, how many were not, and how many didn't complete the eligibility process. This information would be valuable for states in evaluating the effectiveness as well as indicating to states and advocates where there are areas of improvement.

## **Grants and Contracts**

- CLASP also supports the inclusion of questions on grants and contracts for direct services for infants and toddlers, children with disabilities, and children in underserved geographic areas. As this is a requirement in the 2024 CCDF Final Rule, it is valuable to understand how states are utilizing these grants and contracts to support each of these populations, who are often underserved in receiving child care assistance and in having to access to care. As this is a new policy for many states—in 2022-2024 CCDF State Plans, [only 8 states](#) used them—this data is crucial to seeing where states may need more guidance in implementing grants and contracts effectively and who is able to utilize them. With this data, advocates will be able to understand how states are meeting this new requirement, how many children are served, and what share of the grant and contract slots are going to each population of children. This will support analysis of the effectiveness of this policy on supply building, identification of gaps that need to be addressed, and advocacy.

## **Pooling Factor**

- CLASP encourages OCC to connect directly with state agencies to better determine the impact of the pooling factor proposal on different states. We have heard from numerous states with different questions and concerns about how this would work, the potential impact it may have, and the potential administrative burden it may cause. We believe that to fully understand the implications, more information should be shared with states and additional feedback should be gathered directly from them.

Thank you for the consideration of these comments and the need for more publicly available CCDF data. We would be happy to discuss these recommendations with you. If you have any further questions, please contact Alyssa Fortner at [afortner@clasp.org](mailto:afortner@clasp.org).