

CLASP

The Center for Law and Social Policy

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-801: Child Care and Development Fund (CCDF) Quarterly Case-Level Report (Office of Management and Budget #0970-0167)”

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-801: Child Care and Development Fund (CCDF) Quarterly Case-Level Report (Office of Management and Budget #0970-0167).” 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 Quarterly Case-Level Report includes a broad of range of reporting areas to show how State and Territory Lead Agencies are assisting families in addressing child care needs.

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-801 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 Quarterly Case-Level 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:

Monthly Copayment by Setting

- CLASP supports the proposed change to include the monthly copayment amount owed for each setting for each child to better understand how co-payments are distributed across multiple children and program settings. Further, due to the high cost of child care, families with low incomes may struggle to afford the copayment for their care. Having this

information would allow states to continuously assess their copayment policies and the share of costs that fall on families. It would also help OCC to better understand how copayment policies are implemented and how they directly impact families, especially families with more than one child in child care settings. It would also help OCC, staff, and the advocacy community to understand how co-payments differ in different settings. This would help states to continue shaping policies that help address the cost burden on families and to allow them to choose the setting that meets their needs instead of being bound by affordability.

Reporting Race and Ethnicity

- CLASP supports updating the race and ethnicity question to align with the updated Statistical Policy Directive 15: Standards for Maintaining, Collecting, and Presenting Federal Data on Race and Ethnicity (SPD 15). Soon after these updates were released, CLASP [released a report](#) that commended them and offered additional considerations to improve race and ethnicity data over time. We also acknowledged the importance of the government encouraging the use of these uniform standards by state agencies. In addition to the benefits of uniformity and allowing people's identity to be more accurately captured, the use of this expanded race and ethnicity definition in this guidance will provide greater detail in how race and ethnicity and child care access intersect. For example, CLASP recently released a [new iteration of a report](#) that analyzes variations in eligibility and access to Child Care and Development Block Grant (CCDBG) subsidies in 2020 based on available race and ethnicity data. Research like this is made stronger by uniform, detailed, and disaggregated data which is why we urge OCC to consider releasing this data publicly to support the work of researchers, advocates, and policymakers in working to improve child care access for all who need it.

Provider's County FIPS Code

- CLASP supports the inclusion of providers' county FIPS code. This geographic specificity would give greater detail into the areas served by providers accepting CCDF subsidies. This would better highlight gaps in access to assistance by locations which would support states in identifying and addressing slots for children in underserved geographic areas and would support states and advocates in their outreach and advocacy efforts to support child care programs in those locations. Further, as mentioned in the federal register, this would support mapping and geo-coding for purposes like identifying child care deserts.

Total Hours of Care

- Lastly, CLASP supports the inclusion of the revised instructions for reporting total hours of authorized monthly care. Since basing subsidy payments on enrollment rather than attendance is a requirement of the 2024 CCDF Final Rule, this aligns with the new regulations and will reflect the reality of how the program will be operating.

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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.