

5/18/18

State Plan Public Hearing Coordinator  
Early Education and Support Division  
California Department of Education  
1430 N Street, Suite 3410  
Sacramento, CA 95814

RE: CCDF State Plan Comments

Dear Hearing Coordinator,

Thank you for the opportunity to comment on the State Plan. As we look toward next year's significant increased federal Child Care and Development Block Grant (CCDBG) revenue, we want to underscore that all of the new federal funds should augment and not replace existing funding for Early Care and Education (ECE).

**For the current CCDF plan:**

<b>Plan Section/Topic</b>	<b>Alameda County LPC Comments</b>
1.4 Care Coordination	It's important to reference Local Planning Councils (LPCs) as a part of the ECE coordination infrastructure, as you do, and we urge you to at a minimum restore funding to 2010 levels when LPCs had 50% of their budget or \$3.319 million cut from CCDBG Quality Funds. In a County of our size, with over 2,000 licensed programs and 12 state mandates, we receive roughly \$57,000 from CA for operations yet serve a vital local role for publicly accessible ECE planning and coordination.
2.21 Parent Complaint Process	This section that outlines the parental complaint process for providers does not mention the upcoming Title 22 exemption for LEA administered State Preschools, which we are concerned has not had a public vetting and could undermine parent rights.
3.31: 12 month eligibility and redetermination period	Comment: Alameda County has 24 months as a result of our AB 833 pilot and is finding it is resulting in more stable care for children. Consider expanding eligibility beyond the new minimum federal 12 month requirement in the future.
4.11-4.15: Description of subsidy issued to parents	This section outlines the subsidies issued to parents and a process that includes LPC allocation needs for each of the counties. We need to note again that in 2010, the LPCs received 50% cuts that were disproportionate to cuts made to other programs funded with CCDBG, and our cuts have not been restored.
4.6: Overview of Shortage in Supply of High Quality providers	We suggest that in this section you consider elevating shortages for subpopulations such as infants, homeless, and dual language learners. These populations need more access and more quality. Our County has: <ul style="list-style-type: none"><li>• An estimated 22,000 infants and toddlers who qualify for subsidies but do not receive them, as well as</li><li>• Over one hundred homeless young children in Oakland alone, less than 10% of whom we were are currently reaching out to provide with time limited subsidies due to a modest earmark of one time County funds</li><li>• We see provider training as one way to build quality, and have identified ELL and support for working with children of color, particularly African American boys, as two needs for more training resources through mechanisms such as expanded AB 212 support.</li></ul>
5.31-.2: Annual Inspection	We have annually requested increased resources for annual licensing inspections to support children's health and safety and request that you propose a more specific timeline and plan through this section.

6.1-6.13: Workforce Professional Development Framework	As a County with a decline in hundreds of family child care homes in the last several years that also recognizes them as a vital source of infant, toddler, odd hour, and other care, we ask you to assure that any professional development framework is inclusive of family child care workers.
6.21: Training and professional development for infant toddler, ELL, homeless	We are finding that training on working with traumatized children and providers is necessary beyond our state funded foster care bridge program resources, and suggest this area could benefit from a statewide discussion of how this could be systematically available.
7.5: Infant -Toddler supply/quality	We want to stress that we have a huge shortage of infant toddler care due to lack of staff, adequate reimbursement, and facilities and ask you to develop a plan to build quality and access for infants, including expansion of family child care networks.

Quality Improvement Budget:

- We want CDE to have more transparency about criteria for increases in current quality programs. For eight years, the Planning Council Coordinators have been asking for a restoration for the 50% cuts we received in 2010.
- Family Child Care Quality Networks: we need more funding for building more networks and for the Child Care Initiative Project (CCIP) to support quality programs and their business operations.

For Next Year's Federal Funding Increase

- Expansion funds are needed most for infant toddler spaces through more vouchers and significantly increasing the infant reimbursement rates. One Bay Area estimate is that the true cost of preschool care is \$17,000 annually, with higher rates for infant and toddler care, and the state rates still fall far short.
- The greatest barriers to care expansion in our County are inadequate reimbursement rates to support a pipeline of well qualified teachers that can afford to stay in the ECE field, and lack of subsidies and facilities funds.

Sincerely,

Renee S. Herzfeld

Chair