

**FFY22-24 CCDF  
STATE PLAN RESPONSE  
TO PUBLIC COMMENT**

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**Response to Comments Received**  
**FFY 2022-24 Child Care and Development Fund (CCDF) State Plan**  
**Department of Health and Human Services/ Office of Child and Family Services**

The Department of Health and Human Services (DDHS) is designated as the Lead Agency with the primary responsibility for the planning and administration of the Child Care and Development Fund (CCDF)

In accordance with 45 C.F.R. § 98.14(c) Child Care and Development Fund (CCDF) Grant Act of 1990, and MRS Title 5, Chapter 375, §9052 a public hearing was held by the Maine Department of Health and Human Services (DHHS), Office of Child and Family Services (OCFS). The purpose of this hearing was to seek public and provider input and comment on the draft plan for the provision of child care services funded by the federal CCDF. The State Plan describes Maine's plan to support the State's child care infrastructure and comply with federal requirements of the CCDF Act of 1990.

On Wednesday March 24, 2021, the public hearing notification was published in four Maine newspapers, distributed to key stakeholders, and posted on the OCFS website for the CCDF state plan period of October 1, 2021 to September 30, 2024.

One public hearing was held on Wednesday, April 14, 2021 via Zoom.

Participants were invited to present comments and questions regarding the State Plan. Comments are summarized below in order of commenters at the hearing and written in order of receiving written response. Comments are summarized below and like comments with the same general intent are synthesized into a single comment with a response that follows.

Table of Commenters

- Commenter #1: Nicole Hoglund, Portside Learning Center
- Commenter #2: Tracye Fortin, Kennebec Valley Community Action Program
- Commenter #3: Tara Williams, Maine Association for the Education of Young Children and Family Child Care Association of Maine
- Commenter #4: Kim Russell, Council for a Strong America
- Commenter #5: Lori Moses, Catherine Morrill Day Nursery
- Commenter #6: Katie Soucy, Portland ConnectED
- Commenter #7: Rita Furlow, Maine Children's Alliance
- Commenter #8: Members of the Children's Cabinet Early Childhood Advisory Council

The Department would like to thank all members of the public that attended the public hearing electronically and those that submitted written comment. We greatly appreciate the words of support given in the efforts to organize and administer Maine's CCDF State Plan.

Summary of Comments and Responses Note: References to section numbers refer to the proposed state plan noticed to the public, and not to the final state plan.

1.2.2.(a)

**Comment 1:** Comment #3 Commenter #6 requests the Department clarify if the Child Care Choices (CCC) website assists parents in locating child care. Would like "community-based programs where families can connect with a person delivering equitable consumer information".

**Response:** The Department intends to utilize the CCCDF American Rescue Plan Act (ARPA) funds to invest in Help Me Grow in Maine as described in the [Child Care Plan for Maine \(PDF\)](#).

1.3.1.

**Comment 2:** Commenter #3 Commenter #6 asks the Department to engage stakeholders earlier in the CCDF plan drafting. Support continued efforts to speak with representatives with tribal communities.

**Response:** The Lead Agency considers the stakeholder engagement that takes place ongoing to be the predevelopment of the draft plan. Examples are evident throughout the state plan in our communication and collaboration with the vast members of the public and stakeholder groups.

**Comment 3:** Commenter #8 are pleased with the Lead Agency's cross agency collaboration on the CCDF State Plan.

**Response:** The Lead Agency thanks you for the support.

1.4.1

**Comment 4:** Commenter #8 recommends the Lead Agency increase outreach for the CCC website and the Child Care Subsidy Program (CCSP).

**Response:** The Lead Agency has added its efforts of increased outreach in the State Plan with efforts to cross departments and stakeholder groups with the 2021 CCSP Flyer.

1.4.1.(a)(iii)

**Comment 5:** Commenter #3 Commenter #6 recommends adding the coordination goals and which tribes were consulted.

**Response:** The Lead Agency added the following language, "Each of the five Maine Tribal CCDF administrators are contacted on a regular basis by the State Administrator with updates to and invitations concerning child care policies and rules in Maine. The five CCDF tribes recognized in Maine are the Aroostook Band of Micmac Indians, the Houlton Band of Maliseet Indians, Penobscot Nation, Passamaquoddy Tribe at Indian Township and Passamaquoddy Tribe at Pleasant Point. Copies of the CCDF Plan Preprint were sent to each of the tribal administrators with an invitation for discussion and recommendations for the State Plan. January of 2021, the

CCDF Administrator met with the CCDF Tribal Administrator from Penobscot Nation. Efforts for a 2021 meeting between the administrators will continue.”

1.4.1(b)(viii)

**Comment 6:** Commenter #3 Commenter #6 Requests the changing the acronym to MaineAEYC.

**Response:** The Department has made the correction throughout the plan.

1.4.1(b)(viii)

**Comment 7:** Commenter #3 Commenter #6 ask the Children’s Cabinet Advisory Council to strengthen the parent voice in planning and partner with parent organizations in Maine.

**Response:** The Lead Agency has passed the recommendation on to the Children’s Cabinet Coordinator.

1.7.1

**Comment 8:** Commenter #3 Commenter #6 Commenter #7 Commenter #8 Recommends the Department provide regional services at a local level as a system where there is no CCR&Rs in Maine. Coordinated based on the Maine’s Preschool Development Grant Strategic Plan and the Children’s Cabinet Report. Recommends the Department include diverse community needs with specific attention to cultural and language considerations. Offer a “no wrong door” for services to compliment the Child Care Choices website.

**Response:** The Department intends to utilize CCDF (ARPA) funds to invest in Help Me Grow in Maine as described in the [Child Care Plan for Maine \(PDF\)](#).

2.2.1(e)

**Comment 9:** Commenter #3 Commenter #6 Recommends regionalized coordinated services to provide language spoken and provide services based upon people’s native languages.

**Response:** The Department intends to utilize CCDF (ARPA) funds to invest in Help Me Grow in Maine as described in the [Child Care Plan for Maine \(PDF\)](#).

2.2.1(i)

**Comment 10:** Commenter #3 Commenter #6 Appreciate that the CCC website includes a translate option in many languages.

**Response:** Thank you for your comment.

2.3.4(c)

**Comment 11:** Comment #3 Commenter #6 appreciates the Lead Agency’s efforts to comply with the Federal Guidance on background checks and making them at no cost to child care owners and employees.

**Response:** Thank you again for your support.

2.3.5(c)

**Comment 12:** Commenter #3 Commenter #6 Recommends the Department add searchable results to the CCC website for enrollment capacity, hours, dates, and months of operation, and language spoken by the educator/caregiver.

**Response:** The Lead Agency intends to continue its efforts in partnership with Maine Roads to Quality Professional Development Network (MRTQ PDN) to increase the fields available on searched results. Your recommendations will be taken into consideration.

2.3.5

**Comment 13:** Commenter #3 Commenter #6 Recommends the Lead Agency add license-exempt to the searchable option on the CCC website.

**Response:** The Lead Agency intends to continue its efforts in partnership with Maine Roads to Quality Professional Development Network (MRTQ PDN) to increase the fields available on searched results. Your recommendations will be taken into consideration.

2.3.9

**Comment 14:** Commenter #3 Commenter #6 Commenter #7 Commenter #8 Recommends the Department provide regional services at a local level as a system where there are no CCR&Rs in Maine for increased consumer education and outreach to families.

**Response:** The Department intends to utilize CCDF (ARPA) funds to invest in Help Me Grow in Maine as described in the [Child Care Plan for Maine \(PDF\)](#).

2.4.1

**Comment 15:** Commenter #3 Commenter #6

Recommends the Department provide regional services at a local level as a system where there are no CCR&Rs in Maine to include diverse community needs with specific attention to cultural and language considerations. Offer a “no wrong door” for services,

**Response:** The Department intends to utilize CCDF (ARPA) funds to invest in Help Me Grow in Maine as described in the [Child Care Plan for Maine \(PDF\)](#).

3.1.1(b)

**Comment 16:** Commenter #3 Commenter #6 appreciates the Lead Agency’s expansion of age eligibility for children with a disability.

**Response:** The Department thanks you for your support.

3.1.2(a)(iii)

**Comment 17:** Commenter #3 Commenter #6 Recommends the Department allow for graduate and doctorate level eligibility for the Child Care Subsidy Program when a family meets income eligibility.

**Response:** The Lead Agency will not be making a change to the educational levels of eligibility at this time.

3.1.2(a)(iv)

**Comment 18:** Commenter #3 Commenter #6 would like clarification if study per credit is 2 hours per week or per semester.

**Response:** The Department has added clarifying language to show study time is two-hours per week per credit.

3.1.2(c)(ii)

**Comment 19:** Commenter #3 Commenter #6 would like the Lead Agency to add foster care as a priority group for CCSP eligibility.

**Response:** The Lead Agency will not make changes to the State Plan based on this comment. Child Care for children in foster care may be requested through the child's case manager at the OCFS district level.

3.1.2(c)(v)

**Comment 20:** Commenter #3 Commenter #6 recommends the Lead Agency to allow respite care for custodial parents whose children are in child protective services.

**Response:** The Lead Agency will not make changes to the State Plan based on this comment. Child Care respite services can be requested through Child Protective Services.

3.1.5(a) and (b)

**Comment 21:** Commenter #3 Commenter #6 asks if the word "program" was omitted.

**Response:** The State Plan has been edited to reflect "program" in the language.

3.1.6

**Comment 22:** Commenter #3 Commenter #6 recommend the Lead Agency expand CCSP to include parents who are incarcerated or attending addiction recovery programs.

**Response:** The Lead Agency will not make changes to the State Plan based on this comment. Guardians may apply for CCSP while care for a child whose parent is incarcerated.

3.1.6(a)

**Comment 23:** Commenter #3 Commenter #6 Recommend the Lead Agency allow for a package of child care services to support parents' ability to work through coordination with Head Start, PreK, or other early learning programs.

**Response:** The Lead Agency supports parents' ability to work as CCSP allows for wrap around care based on child's attendance of other early learning programs.

3.1.6(b)

**Comment 24:** Commenter #3 Commenter #6 Recommend inquiring about whether the child has an Individualized Education Program (IEP) or Individual Family Services Plan (IFSP)

**Response:** The Lead Agency has added clarification as CCSP applicants are asked if the child has special needs. If an IEP or IFSP is in place, the family can communicate this at the time application.

3.1.6(g)

**Comment 25:** Commenter #3 Commenter #6 recommends the Lead Agency provide intensive case management at a community/regional level.

**Response:** The Department intends to utilize CCDF (ARPA) funds to invest in Help Me Grow in Maine as described in the [Child Care Plan for Maine \(PDF\)](#).

3.1.9(a)

**Comment 26:** Commenter #3 Commenter #6 recommends the 30-day period for processing of CCSP application include a presumptive approval.

**Response:** The Lead Agency will not make changes to the State Plan based on this comment. Per CCDF Rule any reimbursement for child care that was deemed ineligible would then qualify as an improper payment and would require repayment by the parent. Currently the average processing time for a completed CCSP application is 4 days.

3.2.1(a)

**Comment 27:** Commenter #3 Commenter #6 recommend the max copayment for CCSP be at 7% of the family income.

**Response:** The Lead Agency will not make changes to the State Plan based on this comment. Through CRRSA and ARPA funds, the Lead Agency will be waiving copayments through 9/30/24.

3.2.2(v)

**Comment 28:** Commenter #3 Commenter #6 appreciate the family copayment is based on family rather than child.

**Response:** The Lead Agency thanks you for your support of this aspect of the CCDF State Plan.

3.2.4(a)

**Comment 29:** Commenter #3 Commenter #6 recommends waiving the copayments for families.

**Response:** The Lead Agency will not make changes to the State Plan based on this comment. Through CRRSA and ARPA funds, the Lead Agency will be waiving copayments through 9/30/24.

3.3.5(b)(i)

**Comment 30:** Commenter #3 Commenter #6 Recommends the Department provide regional services at a local level as a system where there is no CCR&Rs in Maine.

**Response:** The Department intends to utilize CCDF (ARPA) funds to invest in Help Me Grow in Maine as described in the [Child Care Plan for Maine \(PDF\)](#).

3.4.2(i)

**Comment 31:** Commenter #3 Commenter #6 recommends increasing the 12-weeks of job cessation to 24 weeks.

**Response:** The Lead Agency will not make changes to the State Plan based on this comment.

3.4.4(a)(vi)

**Comment 32:** Commenter #3 Commenter #6 Recommends the Department provide regional services at a local level as a system where there is no CCR&Rs in Maine.

**Response:** The Department intends to utilize CCDF (ARPA) funds to invest in Help Me Grow in Maine as described in the [Child Care Plan for Maine \(PDF\)](#).

4.1.1

**Comment 33:** Commenter #3 Commenter #6 appreciate the Lead Agency's efforts to provide Provider Packet Agreements to encourage CCSP enrollment.

**Response:** The Lead Agency thanks you for your support.

4.1.2

**Comment 34:** Commenter #3 Commenter #6 appreciate CCSP families have choices in child care programs. Recommends the Department provide regional services at a local level as a system where there is no CCR&Rs in Maine.

**Response:** To allow for the widest range of parental choice, the Lead Agency does not link certificates to a specific provider allowing parents to choose a provider of their choice meeting the CCSP requirements. The Department intends to utilize CCDF (ARPA) funds to invest in Help Me Grow in Maine as described in the [Child Care Plan for Maine \(PDF\)](#).

4.1.6(a)

**Comment 35:** Commenter #3 Commenter #6 recommends the Lead Agency adapt a hybrid model for vouchers and contracts for access to high quality care. Recommends the Department provide regional services at a local level as a system where there is no CCR&Rs in Maine.

**Response:** The Lead Agency does not plan to grant or contract slots for child care for CCSP. The Department intends to utilize CCDF (ARPA) funds to invest in Help Me Grow in Maine as described in the [Child Care Plan for Maine \(PDF\)](#).

4.16(b)

**Comment 36:** Commenter #3 Commenter #6 appreciates the Lead Agency's partnership with the Bipartisan Policy Center on the child care gap analysis. Recommends the Department provide regional services at a local level as a system where there is no CCR&Rs in Maine

**Response:** The Lead Agency does not plan to grant or contract slots for child care for CCSP. The Department intends to utilize CCDF (ARPA) funds to invest in Help Me Grow in Maine as described in the [Child Care Plan for Maine \(PDF\)](#).

4.1.7(a)(b)(c)

**Comment 37:** Commenter #3 Commenter #5 Commenter #6 recognizes the BPC report on Child Care in 25 States, with rural Maine having the largest gap. Through the Council for a Strong America highlights family child care as essential to addressing child care deserts. Recommend the Lead Agency partner with Family Child Care Association of Maine to address targeted family child care support.



**Response:** The Lead Agency will take your recommendations into consideration as we work on our [Child Care Plan for Maine \(PDF\)](#).

4.1.8(a)(i)

**Comment 38:** Commenter #3 Commenter #6 recommends the Lead Agency contract reserve slots for certain children. Recommends the Department provide regional services at a local level as a system where there is no CCR&Rs in Maine.

**Response:** The Department intends to utilize CCDF (ARPA) funds to invest in Help Me Grow in Maine as described in the [Child Care Plan for Maine \(PDF\)](#).

4.1.8(a)(ii)

**Comment 39:** Commenter #3 Commenter #6 recognizes the BPC report on Child Care in 25 States, with rural Maine having the largest gap. Through the Council for a Strong America highlights family child care as essential to addressing child care deserts. Recommend the Lead Agency partner with Family Child Care Association of Maine (FCC) to address targeted family child care support.

**Response:** The Lead Agency will take your recommendations into consideration as we work on our [Child Care Plan for Maine \(PDF\)](#). The Lead Agency includes FCC of Maine in all stakeholder outreach and coordination.

4.1.8(a)(iii)

**Comment 40:** Commenter #3 Commenter #6 feels the Lead Agency's partnership with CEI addresses start-up funding for child care programs which increases access.

**Response:** The Department intends to utilize funds as described in the [Child Care Plan for Maine \(PDF\)](#) to increase access to quality child care through the Governor's ARP infrastructure initiative.

4.1.8(b)(i)

**Comment 41:** Commenter #3 Commenter #6 recommends the Lead Agency contract reserve slots for certain children. Recommends the Department provide regional services at a local level as a system where there is no CCR&Rs in Maine.

**Response:** The Department intends to utilize CCDF (ARPA) funds to invest in Help Me Grow in Maine as described in the [Child Care Plan for Maine \(PDF\)](#).

4.1.8(b)(ii)

**Comment 42:** Commenter #3 Commenter #6 recognizes the BPC report on Child Care in 25 States, with rural Maine having the largest gap. Through the Council for a Strong America highlights family child care as essential to addressing child care deserts. Recommend the Lead Agency partner with Family Child Care Association of Maine to address targeted family child care support.

**Response:** The Lead Agency will take your recommendations into consideration as we work on our [Child Care Plan for Maine \(PDF\)](#). The Lead Agency includes FCC of Maine in all stakeholder outreach and coordination.

4.1.8(b)(iii)

**Comment 43:** Commenter #3 Commenter #6 feels the Lead Agency's partnership with CEI addresses start-up funding for child care programs which increases access.

**Response:** The Department intends to utilize funds as described in the [Child Care Plan for Maine \(PDF\)](#) to increase access to quality child care through the Governor's ARP infrastructure initiative.

4.1.8(c)(i)

**Comment 44:** Commenter #3 Commenter #6 recommends the Lead Agency contract reserve slots for certain children. Recommends the Department provide regional services at a local level as a system where there is no CCR&Rs in Maine.

**Response:** The Department intends to utilize CCDF (ARPA) funds to invest in Help Me Grow in Maine as described in the [Child Care Plan for Maine \(PDF\)](#).

4.1.8(c)(ii)

**Comment 45:** Commenter #3 Commenter #6 recognizes the BPC report on Child Care in 25 States, with rural Maine having the largest gap. Through the Council for a Strong America highlights family child care as essential to addressing child care deserts. Recommend the Lead Agency partner with Family Child Care Association of Maine to address targeted family child care support.

**Response:** The Lead Agency will take your recommendations into consideration as we work on our [Child Care Plan for Maine \(PDF\)](#). The Lead Agency includes FCC of Maine in all stakeholder outreach and coordination.

4.1.8

**Comment 46:** Commenter #8 acknowledges OCFS's efforts to improve access to increase supply and improve quality of child care through the many initiatives.

**Response:** The Lead Agency thanks you for your support of our initiatives to increase supply and improve quality of child care in Maine.

4.1.8(c)(iii)

**Comment 47:** Commenter #3 Commenter #6 feels the Lead Agency's partnership with CEI addresses start-up funding for child care programs which increases access.

**Response:** The Department intends to utilize funds as described in the [Child Care Plan for Maine \(PDF\)](#) to increase access to quality child care through the Governor's ARP infrastructure initiative.

4.1.8(d)(i)

**Comment 48:** Commenter #3 Commenter #6 recommends the Lead Agency contract reserve slots for certain children. Recommends the Department provide regional services at a local level as a system where there is no CCR&Rs in Maine.

**Response:** The Department intends to utilize CCDF (ARPA) funds to invest in Help Me Grow in Maine as described in the [Child Care Plan for Maine \(PDF\)](#).

4.1.8(d)(ii)

**Comment 49:** Commenter #3 Commenter #6 recognizes the BPC report on Child Care in 25 States, with rural Maine having the largest gap. Through the Council for a Strong America highlights family child care as essential to addressing child care deserts. Recommend the Lead Agency partner with Family Child Care Association of Maine to address targeted family child care support.

**Response:** The Lead Agency will take your recommendations into consideration as we work on our [Child Care Plan for Maine \(PDF\)](#). The Lead Agency includes FCC of Maine in all stakeholder outreach and coordination.

4.1.9(b)

**Comment 50:** Commenter #3 Commenter #6 appreciate the Lead Agency's prioritized groups. Recommends the Department provide regional services at a local level as a system where there is no CCR&Rs in Maine.

**Response:** The Department intends to utilize CCDF (ARPA) funds to invest in Help Me Grow in Maine as described in the [Child Care Plan for Maine \(PDF\)](#).

4.2

**Comment 51:** Commenter #3 Commenter #6 appreciate the Lead Agency's efforts on the Market Rate Survey. Recommends the Department provide regional services at a local level as a system where there is no CCR&Rs in Maine to increase response rate.

**Response:** The Department intends to utilize CCDF (ARPA) funds to invest in Help Me Grow in Maine as described in the [Child Care Plan for Maine \(PDF\)](#).

4.2.1

**Comment 52:** Commenter #1 Commenter #5 recommends the Lead Agency to conduct and extend the market rate survey for updated child care rates for reimbursement based on the understanding that the Lead Agency did not have enough response to the one conduct in January of 2021.

**Response:** The Lead Agency would like to clarify that in compliance with CCDF Rule, a market rate survey was conducted from October 2020 through January 2021. The MRS was due to close on December 24, 2020 but the Lead Agency extended the open survey until the end of January. The response rate was less than 1% less than the previous 2018 MRS. New rates will be enacted as of July 3, 2021. While the response rate was sufficient in determining updated MRS for 2021, the completion of the narrow cost analysis by providers surveyed was not.

4.2.2(c)

**Comment 53:** Commenter #3 Commenter #6 Recommends Maine create a regional coordinated service that target specific needs for families in child care at the local level.

**Response:** The Department intends to utilize CCDF (ARPA) funds to invest in Help Me Grow in Maine as described in the [Child Care Plan for Maine \(PDF\)](#).

4.2.6(b)

**Comment 54:** Commenter #3 Commenter #6 The link does not work.

**Response:** The links have been updated.

4.3.1(a)

**Comment 55:** Commenter #3 Commenter #6 appreciate the Lead Agency reaching the 75% benchmark for payments rates and leading the country in meeting that percentage.

**Response:** The Department thanks everyone for the supporting reimbursement rate at the 75%.

4.3.3(b)

**Comment 56:** Commenter #3 Commenter #6 appreciate the increased differential rate for non-traditional hours.

**Response:** The Department thanks everyone for the supporting the 35% rate increase for non-traditional hours.

4.4.1(b)

**Comment 57:** Commenter #3 Commenter #6 would like to have reimbursement based on enrollment to continue.

**Response:** Through CRRSA and ARPA funds, the Lead Agency will be waiving copayments through 9/30/24.

4.4.1(b)(1)

**Comment 58:** Commenter #3 Commenter #6 Recommend the department pay for either full-time or part-time basis for CCSP.

**Response:** The Lead Agency will not be making a change at this time as there would be a substantial fiscal impact to the program for changes to current awarded hours.

4.5.1(a)

**Comment 59:** Commenter #3 Commenter #6 recommend the sliding fee scale be based on no greater than 7% of a family's gross income.

**Response:** The Lead Agency will not make changes to the State Plan based on this comment. Through CRRSA and ARPA funds, the Lead Agency will be waiving copayments through 9/30/24.

5.1

**Comment 60:** Commenter #3 Commenter #6 appreciates Maine's commitment to health and safety in the Licensing requirements.

**Response:** The Department thanks everyone for the supporting our commitment to health and safety in the Licensing requirements.

5.1.2(i)

**Comment 61:** Commenter #3 Commenter #6 appreciate CCSP including License-Exempt Recreational Programs.

**Response:** The Department thanks everyone for the supporting License-Exempt Recreational Programs.

6

**Comment 62:** Commenter #4 Recommends the Department invest in the early childhood workforce.

**Response:** The Department intends to utilize CCDF (ARPA) funds to invest in early childhood workforce as described in the [Child Care Plan for Maine \(PDF\)](#).

6.1.3

**Comment 63:** Commenter #3 Commenter #6 commends the collaborative work between the Lead Agency and MRTQ PDN got supporting educators on enrollments in the PDN. Recommends investment in WAGES along the T.E.A.C.H. program.

**Response:** The Lead Agency will not make changes to the State Plan based on this comment. The Department intends to utilize CCDF (ARPA) funds to invest in early childhood workforce as described in the [Child Care Plan for Maine \(PDF\)](#).

6.4.1(i)

**Comment 64:** Commenter #3 Commenter #6 believes there is some grammatical errors and a link that is broken. Recommends offering increased support for educators to meet the developmental needs of diverse learners. With the ELDS, in the future edits to include cultural and linguistic specific development and to include stakeholders from diverse populations.

**Response:** The Lead Agency has fixed the grammatical error. The Lead Agency continues to make cultural and linguistic specific development a priority as part of a whole child approach to development. This includes increasing stakeholder input from diverse populations.

6.4.1(b)

**Comment 65:** Commenter #3 Commenter #6 information is missing.

**Response:** The Lead Agency added the missing information as follows:

“Describe how the required domains are included in the state/territory’s early learning and developmental guidelines. Responses for “other” are optional.

i. Cognition, including language arts and mathematics. Within the MELDS cognition, including language arts and mathematic are covered in detail in MELDS sections: Guiding Principles and Essential Practices, Early Language, and Literacy and Math. [https://www.maine.gov/doi/sites/maine.gov.doe/files/inline-files/MELDS\\_Re-Print.pdf#:~:text=Maine%E2%80%99s%20Early%20Learning%20and%20Development%20Standards%202015%20PREFACE.all%20early%20childhood%20educators%E2%80%99%20efforts%20to%20improve%20professional](https://www.maine.gov/doi/sites/maine.gov.doe/files/inline-files/MELDS_Re-Print.pdf#:~:text=Maine%E2%80%99s%20Early%20Learning%20and%20Development%20Standards%202015%20PREFACE.all%20early%20childhood%20educators%E2%80%99%20efforts%20to%20improve%20professional)

ii. Social development. Within the MELDS social development is addressed in detail in the section titled, Social and Emotional Development. [https://www.maine.gov/doi/sites/maine.gov.doe/files/inline-files/MELDS\\_Re-Print.pdf#:~:text=Maine%E2%80%99s%20Early%20Learning%20and%20Development](https://www.maine.gov/doi/sites/maine.gov.doe/files/inline-files/MELDS_Re-Print.pdf#:~:text=Maine%E2%80%99s%20Early%20Learning%20and%20Development)

[ent%20Standards%202015%20PREFACE.all%20early%20childhood%20educators%E2%80%99%20efforts%20to%20improve%20professional](https://www.maine.gov/doi/sites/maine.gov/doi/files/inline-files/MELDS_Re-Print.pdf#:~:text=Maine%E2%80%99s%20Early%20Learning%20and%20Development%20Standards%202015%20PREFACE.all%20early%20childhood%20educators%E2%80%99%20efforts%20to%20improve%20professional)

iii. Emotional development. Emotional development is also of focus in the MELDS section on Social and Emotional Development.

[https://www.maine.gov/doi/sites/maine.gov/doi/files/inline-files/MELDS\\_Re-Print.pdf#:~:text=Maine%E2%80%99s%20Early%20Learning%20and%20Development%20Standards%202015%20PREFACE.all%20early%20childhood%20educators%E2%80%99%20efforts%20to%20improve%20professional](https://www.maine.gov/doi/sites/maine.gov/doi/files/inline-files/MELDS_Re-Print.pdf#:~:text=Maine%E2%80%99s%20Early%20Learning%20and%20Development%20Standards%202015%20PREFACE.all%20early%20childhood%20educators%E2%80%99%20efforts%20to%20improve%20professional)

iv. Physical development. MELDS put a concentration on physical development within its section titled Physical Development and Health.

[https://www.maine.gov/doi/sites/maine.gov/doi/files/inline-files/MELDS\\_Re-Print.pdf#:~:text=Maine%E2%80%99s%20Early%20Learning%20and%20Development%20Standards%202015%20PREFACE.all%20early%20childhood%20educators%E2%80%99%20efforts%20to%20improve%20professional](https://www.maine.gov/doi/sites/maine.gov/doi/files/inline-files/MELDS_Re-Print.pdf#:~:text=Maine%E2%80%99s%20Early%20Learning%20and%20Development%20Standards%202015%20PREFACE.all%20early%20childhood%20educators%E2%80%99%20efforts%20to%20improve%20professional)

v. Approaches toward learning. MELDS focus on approaches toward learning in the section titled Approaches to Learning.

[https://www.maine.gov/doi/sites/maine.gov/doi/files/inline-files/MELDS\\_Re-Print.pdf#:~:text=Maine%E2%80%99s%20Early%20Learning%20and%20Development%20Standards%202015%20PREFACE.all%20early%20childhood%20educators%E2%80%99%20efforts%20to%20improve%20professional](https://www.maine.gov/doi/sites/maine.gov/doi/files/inline-files/MELDS_Re-Print.pdf#:~:text=Maine%E2%80%99s%20Early%20Learning%20and%20Development%20Standards%202015%20PREFACE.all%20early%20childhood%20educators%E2%80%99%20efforts%20to%20improve%20professional) “

6.4.1(e)

**Comment 66:** Commenter #3 Commenter #6 Links do not work.

**Response:** The links have been corrected.

[https://www.maine.gov/doi/sites/maine.gov/doi/files/inline-files/MELDS\\_Re-Print.pdf#:~:text=Maine%E2%80%99s%20Early%20Learning%20and%20Development%20Standards%202015%20PREFACE.all%20early%20childhood%20educators%E2%80%99%20efforts%20to%20improve%20professional](https://www.maine.gov/doi/sites/maine.gov/doi/files/inline-files/MELDS_Re-Print.pdf#:~:text=Maine%E2%80%99s%20Early%20Learning%20and%20Development%20Standards%202015%20PREFACE.all%20early%20childhood%20educators%E2%80%99%20efforts%20to%20improve%20professional)

6.4.2

**Comment 67:** Commenter #3 Commenter #6 The links are missing.

**Response:** The links have been corrected.

[https://www.maine.gov/doi/sites/maine.gov/doi/files/inline-files/MELDS\\_Re-Print.pdf#:~:text=Maine%E2%80%99s%20Early%20Learning%20and%20Development%20Standards%202015%20PREFACE.all%20early%20childhood%20educators%E2%80%99%20efforts%20to%20improve%20professional](https://www.maine.gov/doi/sites/maine.gov/doi/files/inline-files/MELDS_Re-Print.pdf#:~:text=Maine%E2%80%99s%20Early%20Learning%20and%20Development%20Standards%202015%20PREFACE.all%20early%20childhood%20educators%E2%80%99%20efforts%20to%20improve%20professional)

7.2

**Comment 68:** Commenter #4 believes Maine can recover and build a strong child care system through: Coordinating and growing quality early care and education programs statewide, investing in workforce, supporting families in navigating services, and improving data to monitor progress, analyze impact, support quality improvements.

**Response:** The Department intends to utilize CCDF (ARPA) funds to expand investments in access, quality, and workforce in Maine as described in the [Child Care Plan for Maine \(PDF\)](#).

7.2.1

**Comment 69:** Commenter #3 Commenter #4 Commenter #6 supports the Governor's Economic Recovery Committee's recommendations for the long-term. Recommends the establishment of community-based networks to for expanding access to quality child care.

**Response:** Thank you.

7.3.6(a)(ii)

**Comment 70:** Commenter #3 Commenter #6 recommends continuing to offer ongoing quality stipends.

**Response:** The Department intends to utilize CCDF (ARPA) funds to continue investing in the quality stipends as described in the [Child Care Plan for Maine \(PDF\)](#).

7.4.1(b)

**Comment 71:** Commenter #3 Commenter #6 recommends the establishment of community-based networks to for expanding infant and toddler care.

**Response:** The Department intends to utilize CCDF (ARPA) funds to invest in Help Me Grow in Maine as described in the [Child Care Plan for Maine \(PDF\)](#).

7.4.1(i)

**Comment 72:** Commenter #3 Commenter #6 recommends Maine create a regional coordinated service that target specific needs for families in child care at the local level.

**Response:**

7.4.1(l)

**Comment 73:** Commenter #3 Commenter #6 Commenter #7 appreciates the creation and expansion of the Early Childhood Consultation Program (ECCP).

**Response:** The Departments thanks you for your support.

7.4.2

**Comment 74:** Commenter #3 Commenter #6 appreciates all the hard work that MRTQ PDN District Coordinators put in.

**Response:** The Lead Agency appreciates the DC's efforts as well.

7.5

**Comment 75:** Commenter #2 thanks the Department for the ability to provide comment. Would like to emphasize quality over quantity. Recommends the Department create a community model for statewide direction in each county. The Maine Early Learning Investment Group in Somerset County is a god model.

**Response:** The Department intends to utilize CCDF (ARPA) funds to expand investments in access, quality, and workforce in Maine as described in the [Child Care Plan for Maine \(PDF\)](#).

**Comment 76:** Commenter #3 Commenter #6 is supportive of the goals outlined by the PDG Strategic Plan and the Children's Cabinet Report. Again, advocates for regional coordinated services to access services.

**Response:** The Department intends to utilize CCDF (ARPA) funds to invest in Help Me Grow in Maine as described in the [Child Care Plan for Maine \(PDF\)](#).

#### 7.5.1

**Comment 77:** Commenter #5 Commenter #8 recommends the Department invest and strengthening Maine's child care system to benefit all stakeholders by utilizing the CRRSA and ARPA funds.

**Response:** The Department intends to utilize CCDF (ARPA) funds to expand investments in access, quality, and workforce in Maine as described in the [Child Care Plan for Maine \(PDF\)](#).

**Comment 78:** Commenter #7 urges the Department to utilize funding to improve the state data systems so as not have families repeating information with multiple state systems.

**Response:** The Department intends to utilize CCDF (ARPA) funds to invest in Maine's multiple state systems and to replace OCFS's MACWIS system for Child Care as described in the [Child Care Plan for Maine \(PDF\)](#)

#### 8.1.1

**Comment 79:** Commenter #3 Commenter #6 want to recognize and acknowledge the amount of work that takes place in administering CCDF in the state of Maine. Would like to support and work with the Lead Agency in a strong system of early childhood education.

**Response:** The Lead Agency would like to thank all our stakeholders for their support. We look forward to continuing our work



**PUBLIC HEARING**  
**NOTES KW**

Tara Williams – MAEYCA and Family Child Care Association

Gratitude and appreciating on work. Partnership to strengthen childcare

system and long history of understand education field. Coordination of services for families. Very supportive of Maine PDG/Children's Cab Strategies

Opportunity to build region access and points for parents trying to find childcare

Dept Bi Policy Gap analysis- consideration for childcare slots and contracts for programs under resource communities

Commend Profess dev network retain quality work force

Feel like plan and funding could also support compensation

Child cares subsidy – slots rather attendance – keep what is going now

Nicole Hoglund

Crystal thank you for email responses/ Holly Harris FRS for work that had to be done with cares act

Extension of 2018 market rate survey. Heard it would stay the same. Can you send information back to directors we can't operate with 6 yr old data. Billing has been updated CCSP seen so many improvements to keep rate would set us back and we would have to discharge people for program.

Educare Tracy Fortin

So encouraged by community efforts seeking input for Quality and Access, affordability. We do need slots but quality makes a difference in children's and parents comfort. Look at what true cost of care is. Parent can't afford these dollars. Look at community systems but not reinvent the wheel.

Me Roads – reach state

Headstart- every county

Look at Maine Early Learning Investment group in Som County. This is a good model. this would be good for replication.

**COMMENTER #1:  
NICOLE HOGLUND,  
PORTSIDE LEARNING CENTER**

Nicole Hoglund

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**COMMENTER #2:  
TRACYE FORTIN,  
KENNEBEC VALLEY  
COMMUNITY ACTION  
PROGRAM**

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**COMMENTER #3:  
TARA WILLIAMS,  
MAINE ASSOCIATION FOR  
THE EDUCATION OF  
YOUNG CHILDREN AND  
FAMILY CHILD CARE  
ASSOCIATION OF MAINE**

Tara Williams – MAEYCA and Family Child Care Association

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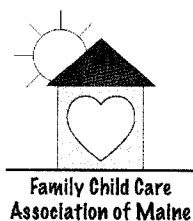
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Public Comment submitted to Maine DHHS on behalf of the  
Family Child Care Association of Maine (FCCAM) and  
Maine Association for the Education of Young Children (MaineAEYC),  
in regards to the  
**DRAFT Child Care and Development Fund (CCDF) Plan for Maine  
FFY 2022 – 24**

Thank you for your diligent work on Maine's draft Child Care and Development Fund (CCDF) plan. On behalf of MaineAEYC and FCCAM, we offer the following considerations for the plan to strengthen Maine's system of high quality child care. As representatives of the child care programs including the educators who work in the field, families who access child care, and the children served by child care programs, our organizations have a long history of understanding the needs of the early childhood education field.

**1.2.2 (a)**

In regards to the question; Who assists parents in locating child care (consumer education)? The box is checked for Community Based Organizations. We are unclear if this refers to Child Care Choices Website or other programs. If it refers to the Child Care Choices website, we would like to recognize that while this website offers some information for families, consumer education would best be filtered through community based programs where families can connect with a person delivering equitable consumer information that meets the needs of the demographics of the families, child care providers, and community.

**1.3.1**

In regards to consultation efforts, we appreciate that the draft plan was shared with the Children's Cabinet Child Care Advisory Council. However, we feel a stakeholder process that begins prior to creating the draft plan allows for a CCDF plan that best represents the voice of child care programs, families, and communities that utilize the services provided within the plan. In many states, stakeholder engagement begins a year prior to the draft plan being created. Maine's Preschool Development Grant Strategic Plan is one example of stakeholder engagement being at the helm of development. We ask that in the future that the CCDF plan engages stakeholders sooner in the process.

We also support continued efforts to speak with representatives with our tribal communities and multiple avenues of reaching out with communication. For example, making connections with community organizations, child care programs, and/or healthcare providers who are part of tribal communities and can support the efforts of tribal leaders and their connections to the plan development.

**1.4.1(a)(iii)**

In regards to describing the coordination goals, processes, and results, including which tribe(s) was (were) consulted, information is not listed.

**1.4.1(b)(vii)**

We appreciate the representation of MaineAEYC and FCCAM on the Children's Cabinet Child Care Advisory Council and the opportunity to bring voices from the field to the table. Please note the acronym change of MEAEYC to MaineAEYC.

**1.4.1(b)(viii)**

There is opportunity to partner with parent organizations in Maine such as Head Start Policy Councils, Parent Ambassadors, etc. We believe additional representation of parents on the Children's Cabinet Advisory Council could strengthen the parent voice in planning.

**1.7.1**

While there is not a current system of regional coordinated services that provide assistance for child care programs and families such as a system of CCR&R's, we strongly believe Maine could be a leader in providing regional services that are tailored to meet the diverse needs of communities at a more local level.

Maine's Preschool Development Grant Strategic Plan includes a goal of:

INCREASE AND STRENGTHEN CONNECTIONS AND COMMUNICATION AMONG STATE AGENCIES AND WITH COMMUNITY PARTNERS TO EXPAND ACCESS TO SERVICES, CREATE EFFICIENCIES, AND REDUCE OVERLAP AND REDUNDANCIES (PDG Strategic Plan, pg 13)

Enhance or create local and regional networking opportunities for early care and education providers and nurture cross-sector partnerships to serve as information hubs.

Create and strengthen connections between early care and education regional coalitions and community partners, including the medical field, social service systems, and public schools.

The Children's Cabinet Report includes:

With the hiring of a new Children's Health Insurance Program Coordinator and an Early Screening, Diagnostic and Treatment (EPSDT) Coordinator, the Office of MaineCare Services is expanding its capacity to help families with young children to access needed health care coverage and ensure children on Maine Care access needed health care services. In 2021, these positions will work with the Children's Cabinet

Early Intervention Workgroup to identify the best ways to communicate with families about eligibility for MaineCare and its services.

Support families to navigate Child Find, Early and Periodic Screening, Diagnostic and Treatment in MaineCare, and Child Development Services to ensure children receive necessary health and intervention services.

Ensure no wrong door for families to access services, such as SNAP, MaineCare and WIC, and establish a centralized entity around developmental screening and care coordination for early intervention services.

Ensure access to and utilization of high-quality preventive services for young children and their families.

Establish an Early Childhood Integrated Data System to track progress on early childhood goals and to analyze impact of policy decisions.

Improving access to the childcare subsidy program.

Support families to navigate Child Find, Early and Periodic Screening, Diagnostic and Treatment in MaineCare, and Child Development Services to ensure children receive necessary health and intervention services.

Our organizations are supportive of the goals outlined by the PDG Strategic Plan and the Children's Cabinet Report. While Maine had a system of regional resources in the past, it is our belief that regional coordinated services could be innovative for our times and address the current needs for families, children, and child care programs. Maine is fortunate to have some of these elements in place and bringing them together regionally would streamline services for families as well as identify ways to provide equitable access to services, provide comprehensive data tracking, and bring together resources for child care programs. A system designed to meet the needs of the demographics, diversity, and resources within communities builds trust and invites partnership and that benefits everyone accessing the system.

### **2.2.1(e) and (f)**

Not utilizing bilingual translators or outreach workers creates barriers for families who are English language learners. Translation in the form of paper translations and web based translations is a beginning step. For families needing to ask questions, seek support, or clarification about services, it would be more equitable to be assisted in their native language while working in-person with outreach workers or someone who can verbally explain and answer questions. Relationship building with our migrant communities to build trust is imperative as they seek access to resources and child care.

Regionalized, coordinated services could have the capacity to assess the community needs such as languages spoken and provide services based upon people's native languages. While Maine is advancing in equity measures such as creating an Office of Population Health Equity, we can also advance equity in family and child care resources through the CCDF Plan.

### **2.2.1(j)**

We appreciate that the Child Care Choices Website includes a translate option in many languages.

### **2.3.4(c)**

We appreciate the Lead Agency's efforts to comply with Federal Guidance on background checks. We also appreciate the efforts to make these background checks at no-cost to child care owners and employees.

### **2.3.5(c)**

In regards to provider information available in searchable results, we feel it can be a goal for this plan to include the following searchable information:

**Enrollment Capacity:** Families may be looking for access to child care that is based on the size of the program.

**Hours, Dates, and Months of Operation:** This is an important search element for working families and especially important for families seeking non-traditional hours for care.

**Languages Spoken by the educator/caregiver:** Maine is seeing growth in migrant populations expanding Maine's linguistic diversity. It is important to migrant families and children that they be able to search potential child care providers that speak their native language.

### **2.3.5**

In regards to licensed programs being part of a searchable list of providers, because there are not enough licensed child care programs to often meet the needs of communities, licensed exempt CDDF family child care providers play an important role, particularly in our rural communities to serve children and families. Therefore, we feel they should be part of the searchable database.

### **2.3.9**

Families do not have access to a system of resource and referral services to assist them in their child care needs among other resources that could be provided within a system of regional, coordinated services. Referring to our response given in 1.7.1, investing in regional services with no wrong door for families and providers will strengthen our child care system and child referral services.

### **2.4.1**

In regards to how the Lead Agency shares information with eligible parents, the general public, and where applicable, child care providers about the availability of child care services provided through CCDF, information given is all web-based. Maine has a significant broadband problem which leaves many families lacking the resources to access the internet. Even in areas with broadband access, families who are homeless or lack the financial means to access the internet are missing out on resources. Families who do not speak English may find it difficult to navigate all the web based services. If we are to be an equitable Maine that creates opportunities for all its citizens, we need to provide these services in

person through regional, coordinated services so that families build trust with the people providing these services are given information in a way that is understandable and accessible to them regardless of their demographics, socio-economic status, or languages spoken.

**3.1.1(b)**

We appreciate that the Lead Agency expands the age eligibility in the CCDF plan for children who are mentally or physically incapable for self care to include children who are between thirteen (13) years of age and eighteen (18) years of age, inclusive, who are physically or mentally incapable of caring for him or herself, or is under court supervision.

**3.1.2(a)(iii)**

In regards to parents attending Graduate or Doctorate-level Educational Programs not being eligible for Child Care Subsidy, we feel that child care costs should not be a barrier to educational and career advancement for families. If a family is income eligible for child care, we feel the level of higher education that they are working on should not be a factor. These families are likely coming out with higher student loan debt, so to have child care costs added on top of that just keeps Maine families from advancing socioeconomically. Their potential career advancement will likely impact the economy in a positive way and supporting their Child Care Subsidy eligibility is an investment in our economy.

**3.1.2(a)(iv)**

We are seeking clarification if 2 hours of study per credit is allotted per week for CCSP or per semester?

**3.1.2(c)(ii)**

In regards to children in foster care being considered to be in protective services for the purposes of eligibility at determination, we recommend that foster care be included in the definition of protective services. Children in the foster care system have a high probability that they have experienced trauma and therefore, in addition to a stable foster home, a stable high quality child care program could help them build resiliency through nurturing and trusting relationships. Foster care is lacking in Maine, and being able to open subsidy eligibility up to include children in foster care regardless of the foster families work, education, or training responsibilities provides the foster family with breaks from the important, emotionally consuming responsibilities of caring for a foster child.

**3.1.2(c)(v)**

In regards to providing respite care to custodial parents of children who are in child protective services, we recommend that respite care is provided to support the custodial parent who may be adapting to full time care of the child. Families in crisis need support. Providing respite care can support the mental health of custodial parents which can result in better care and nurturing for their child. This is especially true for single mothers or fathers with no other family, friends, or community support.

**3.1.5(a) and (b)**

We appreciate extending subsidy eligibility determination and redetermination to include parents who provide documentation that renders him/her ineligible to provide care for a child and is unable to work

while the other parent is attending an educational program, job training program, or apprenticeship. In both of the descriptions, there may have been an omission of the word program after educational?

### **3.1.6**

We recommend expanding the subsidy program to cover parents who are incarcerated or attending addiction recovery programs. Continuity of care for the child is vital when parents experience incarceration or addiction recovery. If these measures are already in place, please disregard.

#### **3.1.6(a)**

We recommend coordinating with Head Start, Prekindergarten, other early learning programs, or school-age programs to create a package of arrangements that accommodates parents' work schedules. Families who work a combination of jobs or jobs that require different hours during the week may not be able to have their child care needs filled by one sole program. Allowing a package of child care services can support parents' ability to work. Arrangements that ensure communication and a connection between programs and the family can help support a child's transition between programs.

#### **3.1.6(b)**

In regards to inquiring about whether the child has an Individualized Education Program (IEP) or Individual Family Services Plan (IFSP), we recommend the inquiry of children on IEPs or IFSPs to support child care placement that can provide accommodations according to their IEPs or IFSPs. This would also support the child care program having the ability to communicate with CDS or other support services being provided for the child.

#### **3.1.6(g)**

We recommend providing more intensive case management for families with children with multiple risk factors. We feel from models in other states that these types of services can function more productively at the community/regional level.

#### **3.1.9(a)**

We recommend that the 30 day period include a presumptive approval so that parents don't lose a child care spot or the potential to lose work because they don't have child care. Not many programs can hold open a spot for 30 days and not many jobs can wait for an employee to start working 30 days later.

#### **3.2.1(a)**

In column f, the percentage of income of the copayment is 10% of the family's income. We recommend meeting the Office of Child Care's recommendation of 7% of a family's income at the maximum.

#### **3.2.2(v)**

We appreciate that family contribution fee is based per family and not per child.

#### **3.2.4.(a)**

Families with an income at or below the Federal poverty level for families of the same size are already financially burdened by every expense they incur. Waiving family contribution payments would ease that financial burden for our lowest income level families.

#### **3.2.4.(a)**

Families who are experiencing trauma and need to receive child protective services should focus on the care of themselves and their child. Relieving a financial burden of a family co-payment can support their ability to focus on the care of their child and provide the stress relief of paying for child care.

#### **3.3.5(b)(i)**

Enrollment in CCSP could be made easier for families experiencing homelessness if they had a community based location which they submit and have help submitting application materials. A no wrong door approach could be provided with regional, coordinated service hubs providing multiple supports and resources for families. Refer to our explanation in 1.7.1.

#### **3.4.2(i)**

We recommend that CCSP cover up to 24 weeks after a job cessation while the parent searches for work, participates in job training, or attends educational programming. This is especially important for the continuity of care of the child(ren) and takes into account the fragile nature of the economy and job openings in the pandemic. Especially in certain parts of our state where jobs are just not available.

#### **3.4.4(a)(vi)**

In regards to extending office hours to assist families accessing TANF program funds, we recommend that the Lead Agency consider the barrier that working families can have trying to take time off during work week hours when needing support with applications and other programming criteria. Creating a system of regional, coordinated services would allow local hubs/programs to offer hours that support the demographics of the areas served, therefore allowing more equitable access.

#### **4.1.1**

We appreciate the Lead Agency's efforts in expanding the number of child care programs in the CCSP by providing Provider Packet Agreements to encourage enrollment.

#### **4.1.2**

We appreciate that parents have choices in child care programs. Regional, coordinated service hubs could expand providing information to parents that fit their needs in child care categories, such as private, not-for-profit, faith-based providers; centers; FCC homes; or in-home.

#### **4.1.6(a)**

In regards to providing child care services through grants or contracts for child care slots, we recommend that the Lead Agency adopt a hybrid model of utilizing vouchers and contracts. Contracts can directly be tied to equitable access for children who need access to high quality child care the most; under-resourced children, infants/toddlers, children with special needs, children with linguistic and

cultural backgrounds, children experiencing homelessness, and children who need non-traditional hour care. Contracts reserve slots for certain children while providing child care providers with stable income. Capacity to provide contracts can be increased by utilizing regional, coordinated service hubs who can implement the contracts.

**4.1.6(b)**

Contracts can directly be tied to equitable access for children who need access to high quality child care the most; under-resourced children, infants/toddlers, children with special needs, children with linguistic and cultural backgrounds, children experiencing homelessness, and children who need non-traditional hour care. Contracts reserve slots for certain children while providing child care providers with stable income. Capacity to provide contracts can be increased by utilizing regional, coordinated service hubs who can implement the contracts.

**4.1.7(a)(b)(c)**

We appreciate the Lead Agency's partnership with the Bipartisan Policy Center to do a child care gap analysis. We support the following recommendation made in the report to compile parent choice data: "As state and local administrators make decisions on how and where to address child care gaps in their communities, it is especially important that they collect parent choice information in local settings." (pg 17, Child Care in 25 States, Bipartisan Policy Center)

Regionally, coordinated service hubs would expand data collecting capacity at the local level. Data collection that involves a level of trust between those gathering data and those giving data, is more apt to be built when the relationship is formed locally.

**4.1.8(a)(i)**

Contracts reserve slots for certain children while providing child care providers with stable income. Capacity to provide contracts can be increased by utilizing regional, coordinated service hubs who can implement the contracts.

**4.1.8(a)(ii)**

The Lead Agency has recognized based on the Bipartisan Policy Center Report: Child Care in 25 States, that rural Maine shows our largest gap for child care. 26% of people live in child care deserts in Maine's rural communities according to the Center for American Progress. A recent report by the Council for Strong America highlighted how family child care is essential to addressing child care deserts in rural Maine. We support partnering with the Family Child Care Association of Maine to address targeted family child care support.

**4.1.8(a)(iii)**

We feel that the Lead Agency's partnership with CEI helps address start-up funding for child care programs that could increase access.



“Provide \$1 million in mini grants to providers opening new facilities or expanding a current facility. Priority will be given to providers in rural areas.”

<https://www.maine.gov/dhhs/ocfs/system-improvement-updates/recent-update.shtml?id=2103845>

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#### **4.1.8(d)(i)**

Contracts reserve slots for certain children while providing child care providers with stable income. Capacity to provide contracts can be increased by utilizing regional, coordinated service hubs who can implement the contracts.

#### **4.1.8(d)(ii)**

The Lead Agency has recognized based on the Bipartisan Policy Center Report: Child Care in 25 States, that rural Maine shows our largest gap for child care. 26% of people live in child care deserts in Maine’s rural communities according to the Center for American Progress. A recent report by the Council for Strong America highlighted how family child care is essential to addressing child care deserts in rural Maine. We support partnering with the Family Child Care Association of Maine to address targeted family child care support.

#### **4.1.9(b)**

We appreciate prioritizing children who are homeless, who come from low income families, or who have special needs on CCSP wait list. We are concerned that families who could be eligible for subsidy are not aware of eligibility. Being able to provide families with CCSP eligibility information at the local level through regional, coordinated services opens the door for more families to access eligibility determination and provide child care providers with information to give to families.

#### **4.2**

We appreciate the attempt made to collect some cost analysis data on the most recent Market Rate Survey. Moving to this data would provide a better analysis of what it would cost for high quality care that supports children, families, the childcare workforce, and childcare programs. While there was not a significant enough response to the questions on the Market Rate Survey, we feel that regional, coordinated service hubs could support better survey responses with the capacity to obtain information in multiple ways through online, phone, and in person support.

#### **4.2.2(c)**

We recommend that Maine create, partner, and innovate a system of regional, coordinated services that target specific needs for families in child care providers at the local level. This type of system can build capacity for providing families valuable resources in a way that is equitable and accessible to them, while supporting providers by partnering existing resources to bring everything together with a “no wrong door” approach.

#### **4.2.6(b)**

The link does not work

**4.3.1(a)**

We appreciate the Lead Agency reaching the 75% benchmark for payment rates and leading the country in meeting that percentage.

**4.3.3(b)**

We appreciate the increased differential rate provided for non-traditional hours receiving 35% for 6PM-6AM and weekends.

**4.4.1(b)**

We appreciate the Lead Agency utilizing CCDF Covid-19 relief funds to pay CCSP funds based on enrollment and not attendance. We urge this continued effort to encourage stability in income for child care programs that run on razor thin margins and entice more child care programs to enroll in CCSP.

**4.4.1(b)(1)**

We recommend paying for full time and part time. Smaller increments can deter programs from accepting CCSP when the program can fill full time spots for private pay families. Most programs need to fill spots more consistently to pay wages of staff and other operating costs.

**4.5.1(a)**

We recommend the sliding fee scale be based on no greater than 7% of a families gross income.

**5.1**

We appreciate Maine's Licensing Requirements and the strong commitment to health and safety while also acknowledging the necessity of quality for children's healthy development.

**5.1.2(i)**

We acknowledge the important role that CCSP Nonrelative License-Exempt Recreational Programs have for children in families to access child care and we appreciate CCSP covering these programs to support families particularly in child care deserts.

**6.1.3**

We commend the work done by MRTQ PDN and the collaboration with the Lead Agency to support educators enrolling in the PDN. This helps move Maine forward in supporting quality and collecting data about the workforce.

We acknowledge the reference to workforce retention within this section. We know that we cannot have retention in the child care workforce without supporting increased wages and benefits. Training, education, and experience are often not enough to get the workforce out of poverty level wages, therefore there is little incentive to remain in the field. The Center for the Study of Child Care Employment released the following data pertaining to Maine's child care workforce:

“Maine early educators with a bachelor’s degree are paid 25 percent less than their colleagues in the K-8 system. The poverty rate for early educators in Maine is 16.5 percent, much higher than for Maine workers in general (9.4 percent) and 8.3 times as high as for K-8 teachers (2 percent).”

This report also indicates that we have stalled in using extra CCDF funding to support the workforce.

[https://cscce.berkeley.edu/workforce-index-2020/wp-content/uploads/sites/2/2020/11/2020-Index\\_StateProfile\\_Maine.pdf](https://cscce.berkeley.edu/workforce-index-2020/wp-content/uploads/sites/2/2020/11/2020-Index_StateProfile_Maine.pdf)

Governor Mill’s Economic Recovery Committee recommended the following investments in the Child Care Workforce:

RECOMMENDED INVESTMENT: Building a strong, comprehensive birth through five system will take significant public and private investment. Further analysis is required to identify a dollar amount.

Early Childhood Education Workforce Investment Total: \$5.2M, broken down as follows:

- Wage Supplements: \$5MM
- TEACH Program: \$200k

#### **6.4.1(i)**

In regards to Maine’s Early Learning Development Standards being culturally and linguistically appropriate, there are some grammatical errors that make the intent of the answer hard to understand. We appreciate the technical assistance that MRTQ can provide to help programs understand cultural and linguistic development of children in their programs. We also believe with Maine’s increasing diverse population both culturally and linguistically, that goals within the CCDF plan need to offer increasing support for educators to meet the developmental needs of diverse learners.

Within the ELDS, there is one link referenced to support educators in linguistic development standards for dual language/english language learners. That link no longer links to those standards. The updated link is: <https://wida.wisc.edu/teach/early/elds> The ELDS is an important document in Maine and one that does a wonderful job viewing development across learning domains and bridging development from birth through kindergarten. In future plans to review and update these guidelines, we feel that putting cultural and linguistic specific development at the forefront of plan updates would be an important step forward. In addition revisions and updates in the future should include stakeholders from diverse populations.

#### **6.4.1(b)**

It appears information is missing.

#### **6.4.1(e)**

Both links do not work.

#### **6.4.2**

It appears links are missing.

### **7.2.1**

We support the Governor's Economic Recovery Committee's recommendation within their report to invest more state funding into Maine's system of child care to invest in all components described within the table of this section.

"In the long-term the state will need to invest significantly more —on par with its investment in the K-12 system— to establish a comprehensive system of early care and education. The following actions are critical to transform our current, fragmented, and mostly privately-funded system into a comprehensive birth through five early care and education system that works for everyone"

[https://www.maine.gov/future/sites/maine.gov/future/files/inline-files/EconomicRecoveryCommittee\\_Report071520.pdf](https://www.maine.gov/future/sites/maine.gov/future/files/inline-files/EconomicRecoveryCommittee_Report071520.pdf)

### **7.3.6(a)(ii)**

Offering ongoing quality stipends opens up opportunities for programs to increase staff wages and benefits.

### **7.4.1(b)**

In rural Maine, the gap of care is more prevalent creating a barrier for working families. Within our rural communities, it is imperative that we establish the operation of community-based, neighborhood-based, or provider networks comprised of home-based providers, or small centers focused on expanding the supply of infant and toddler care.

### **7.4.1(i)**

As stated previously, we appreciate the content of the Child Care Choices website, however families, especially those who are under resourced without access to the internet, families who are culturally and linguistically diverse, and families who want to engage with a person about child care options in their area are not served through a website alone. These types of services can happen with regionally coordinated services that meet the needs of diverse communities. A website does not create equitable access to information.

### **7.4.1(l)**

We appreciate the creation and expansion of the infant and early childhood mental health consultation program.

### **7.4.2**

We appreciate all the hard work that MRTQ PDN District Coordinators put in.

### **7.5**

Maine is about people and supporting each other on local levels. Human connection is what makes our small state so great. Bringing supports to families and child care providers within their region addresses so many of the barriers we see and hear about daily from those living the challenges within child care programs and having equitable access to resources.

While there is not a current system of regional coordinated services that provide assistance for child care programs and families such as a system of CCR&R's, we strongly believe Maine could be a leader in providing regional services that are tailored to meet the diverse needs of communities at a more local level.

Maine's Preschool Development Grant Strategic Plan includes a goal of:

INCREASE AND STRENGTHEN CONNECTIONS AND COMMUNICATION AMONG STATE AGENCIES AND WITH COMMUNITY PARTNERS TO EXPAND ACCESS TO SERVICES, CREATE EFFICIENCIES, AND REDUCE OVERLAP AND REDUNDANCIES (PDG Strategic Plan, pg 13)

Enhance or create local and regional networking opportunities for early care and education providers and nurture cross-sector partnerships to serve as information hubs.

Create and strengthen connections between early care and education regional coalitions and community partners, including the medical field, social service systems, and public schools.

The Children's Cabinet Report includes:

With the hiring of a new Children's Health Insurance Program Coordinator and an Early Screening, Diagnostic and Treatment (EPSDT) Coordinator, the Office of MaineCare Services is expanding its capacity to help families with young children to access needed health care coverage and ensure children on MaineCare access needed health care services. In 2021, these positions will work with the Children's Cabinet Early Intervention Workgroup to identify the best ways to communicate with families about eligibility for MaineCare and its services.

Support families to navigate Child Find, Early and Periodic Screening, Diagnostic and Treatment in MaineCare, and Child Development Services to ensure children receive necessary health and intervention services.

Ensure no wrong door for families to access services, such as SNAP, MaineCare and WIC, and establish a centralized entity around developmental screening and care coordination for early intervention services.

Ensure access to and utilization of high-quality preventive services for young children and their families.

Establish an Early Childhood Integrated Data System to track progress on early childhood goals and to analyze impact of policy decisions.

Improving access to the childcare subsidy program.

Support families to navigate Child Find, Early and Periodic Screening, Diagnostic and Treatment in MaineCare, and Child Development Services to ensure children receive necessary health and intervention services.

Our organizations are supportive of the goals outlined by the PDG Strategic Plan and the Children's Cabinet Report. While Maine had a system of regional resources in the past, it is our belief that regional

coordinated services could be innovative for our times and address the current needs for families, children, and child care programs. Maine is fortunate to have some of these elements in place and bringing them together regionally would streamline services for families as well as identify ways to provide equitable access to services, provide comprehensive data tracking, and bring together resources for child care programs. A system designed to meet the needs of the demographics, diversity, and resources within communities builds trust and invites partnership and that benefits everyone accessing the system.

#### **8.1.1**

We recognize and want to acknowledge the amount of work that takes place in planning for and administering CCDF in the state of Maine. We appreciate the immense work and as organizations representing those working in the field, families accessing child care, and the children served by child care programs, it is our intent to support the strongest system of early childhood education possible and work with the Lead Agency to meet the needs of that system.

**COMMENTER #4:  
KIM RUSSELL,  
COUNCIL FOR A  
STRONG AMERICA**





April 14, 2021

To the Office of Child and Family Service:

While my organizations typically do not make public comments on Maine's CCDF Plan, given our current unique place in time and the unprecedented opportunities in front of us to use funding from the federal American Rescue Plan to reshape and strengthen the child care industry in Maine, I would like to offer some comments for your consideration.

First, I want to publicly thank Director Landry and staff at the Maine Office of Child and Family Services for your tremendous work and dedication during the pandemic.

One of the many lessons we have learned during these past 15 months is that child care is a critical underpinning for so many other sectors of Maine's economy. There is now greater public and private sector understanding of Maine's need for a child care system that keeps *working parents on the job and provides children with the building blocks for healthy physical, cognitive, and social/emotional development*. This letter will highlight ways in which we hope the new CCDF plan will take additional steps to ensure a healthy and sustainable child care system for Maine's youngest learners and their working parents.

As one of the co-leaders of Maine's Right from the Start Coalition, I've been pleased to be part of a group that has researched and identified programmatic and policy initiatives that address strengthening early childhood education and supports for families. We believe Maine can recover and build our child care system by:

1. coordinating and growing quality early care and education programs statewide;
2. investing in and strengthening our early childhood workforce;
3. supporting families in finding and navigating child care and early childhood services;  
and
4. improving data to monitor progress, analyze impact, and support continuous quality improvements.

4 Jersey Circle / Topsham, ME 04086 / 207-725-5946

StrongNation.org

  StrongNationUSA



More specially, we hope the new CCDF plan will help build access to high quality early care and education within an early childhood system that has regional coordination and a “no wrong door” approach for families to access services. Maine families with young children should be able to gain support and services for child care through models like the Help ME Grow framework, to improve positive parent-child relationships, family health, well-being and financial stability, and provide “no wrong door” services for families. At the same time, Maine’s youngest children should be able to gain access to high quality child care that supports learning and healthy child development.

None of this is possible if we don’t also focus on building an early childhood system that can function as a public good with dedicated funding and a child care workforce valued as a vital part of Maine’s education system. We hope that through this plan, OCFS will consider offering providers salary supplements, as recommended by the Economic Recovery Committee and Maine’s 10-year Strategic Planning for Economic Development, on a tiered scale that rewards experience, credentials, and degrees earned, awarded to early childhood educators working in child care programs. At the same time we are hopeful that the plan will help expand early childhood education programs at CTEs across Maine, increase apprenticeships in licensed Maine child care programs, and providing comprehensive scholarships toward the attainment of an early childhood education associate or bachelor’s degree that allows the person working in a licensed child care program to be supported in their higher education journey and graduate without student debt.

We see these as foundational recommendations that align with the goals of the Governor’s Children’s Cabinet. It is our hope that Maine’s new CCDF plan will also embrace these goals and the steps needed to attain them.

Sincerely,

Kim Russell  
State Director

4 Jersey Circle/ Topsham, ME 04086 / 207-725-5946

[StrongNation.org](http://StrongNation.org)

StrongNationUSA

**COMMENTER #5:**  
**LORI MOSES,**  
**CATHERINE MORRILL**  
**DAY NURSERY**

**Maine's Child Care Development Fund (CCDF) Plan**

**FFY 2022-24**

**Testimony of Lori Moses**

**April 14, 2021**

Thank you for the opportunity to testify regarding Maine's CCDF Plan. My name is Lori Moses and I have worked in childcare in Maine for over 30 years, currently as the Executive Director of Catherine Morrill Day Nursery, a nationally accredited childcare center in Portland. Among my many roles in ECE, I have administered subsidy contracts, managed a family childcare network in rural Androscoggin County and administered the childcare Resource Development Center (Child Care Connections) for Cumberland County. I feel like I have a lot to offer regarding what has worked and what has not worked over the years. I understand the importance of this CCDF Plan and the role that it plays in Maine's childcare system, having been around when the Child Care Development Block Grant (CCDBG) was first authorized in 1990. And that is why I was disappointed in this particular plan because I think it is a missed opportunity that doesn't match the scope of the need nor the opportunity of the current times. The time to build a birth-to-five system in Maine is now. We can't keep waiting for the "time to be right" or for there to be adequate funding. We have the funding and now is the time.

I would say that Maine's childcare system is broken, but we don't really have a childcare system that truly benefits all the stakeholders: parents, childcare providers and the children. We have some components of a system, such as Maine Roads to Quality's Professional Development Network, the Child Care Choices website, Quality for ME, the Child Care Subsidy Program and of course the Licensing division, but there is still not a system to meet the community need for assessable, affordable and quality childcare. The childcare industry was already quite fragile before the pandemic hit. From the day Governor Mills declared an emergency last March, she said that childcare workers were "essential". For years, childcare advocates have been trying to get the attention of policy makers for them to understand that childcare is the backbone of our economy. It took a pandemic for childcare to finally be recognized for its value to society. Across the country, we advocated for \$50 billion in federal dollars to go to childcare, and because both the federal Coronavirus Response and Relief Supplemental Appropriation Act (CRRSAA) and the American Rescue Plan passed, Maine will be receiving its share of these funds to the tune of over \$118 million. Please listen to the advocates who continue to fight for a comprehensive Birth through Five system. Now is Maine's opportunity to go big!

So what should Maine's system look like? Significant time and resources have already been spent in developing the **Strategic Plan for Meeting the Needs of Vulnerable Children Birth to Age 5 and Their Families**, which was a five-year course of action to strengthen Maine's mixed delivery system for early care and education. The process of developing this plan included diverse stakeholders and the result, if funded, would be that Maine would be closer to having an integrated, comprehensive system, beginning with state and regional coordination. I think that Maine's CCDF State Plan does not take advantage of the recommendations of this strategic plan and the opportunity of this CCDBG funding to help move Maine closer to having a comprehensive childcare system.

Personally, I don't believe that Maine's Child Care Choices website by itself is the most effective way to provide consumer education and referral information to parents who are looking for childcare. At Catherine Morrill, our current waiting list is over 160 children: we get phone calls every day from families who are desperate to find and pay for childcare so that they can work. The calls have increased recently because many local childcare programs have closed. And very few of the parents who called us found us from the State's website. Having worked in Maine's childcare resource development center system, and having spent my graduate internship at the Children's Council of San Francisco (which is a Child Care Resource & Referral agency), I know first-hand how much information...and hand-holding...many parents need when looking for childcare. After all, we are talking about leaving their precious children with strangers. Most families don't know anything about childcare until they need it.

And what happens when there is a childcare “desert” in a community? Who is responsible for targeted resource development? Who tracks the number and capacity of programs that open and close in a community to identify the local need? Who knows if there is a vacant building or licensable site that can be converted to childcare? The most effective response to the lack of childcare capacity in a region is to have a local hub with experts who understand the local childcare landscape, who understand the licensing regulations and local zoning laws, and who has the pulse of the local business needs and school environment to be able to actively recruit new childcare programs and connect the dots. People are more likely to trust local messengers rather than state government. Regional hubs are important to parents, childcare providers, schools and businesses so that parents can access multiple services with a one-stop shop that has no wrong door.

There are administrative opportunities that can take place without legislation and the CCDF plan can always be amended. Forty-seven other states have childcare resource and referral programs. There’s a definite reason for that and we should learn what Maine is missing by not having a CCR&R system. And please rethink the opportunity to offer contracts to high quality programs to care for Maine’s most vulnerable children, which will stabilize the childcare system. In 2011, around the time when Maine was cancelling subsidy contracts, Maine and Texas were the only 2 states remaining that utilized both contracts and portable vouchers. Ten years later, there are 21 states that utilize both contracts and portable vouchers. These other states have recognized the benefits of having both kinds of subsidy as part of their mixed-delivery system. Yes, there are costs involved with contracts, but the benefits to the children and positive outcomes for families make these contracts cost-effective. And, please reinstate voucher eligibility to include families who are “at risk” including those who are receiving substance use services. These families are Maine’s most vulnerable and they can’t participate in their treatment plans if they don’t have affordable childcare.

And finally, please extend the Market Rate Survey. For programs like mine that accepts vouchers, we must be able to keep pace with the local market. Childcare costs have more than doubled since I started working in Maine. In my program, we lose approximately \$36,000 dollars each year by accepting vouchers, even though the reimbursement rate is at the highest level allowed at the 75<sup>th</sup> percentile. The reason for this is because our private rate is higher than the market rate. And our private rate does not cover the true cost of running a quality program because the true cost is more expensive than most parents can afford. But the market rates cannot get stuck at 2018 levels for the next 3 years or we will lose more providers who won’t be able to afford to accept vouchers. My understanding is that there were not enough responses to make the results statistically viable. When the RDC’s were around, they helped the State secure a high return rate of the Market Rate Survey because, based on their local relationship with providers, they contacted every provider in their catchment area multiple times. The return rates for the Market Rate Surveys used to be in the 90 percent range.

Please think big! Childcare is finally being recognized for its important role in the economy, its importance for school readiness, and its importance for early intervention and prevention. There are some exciting initiatives regarding childcare happening at the local level in many Maine communities. There are also some exciting bills right here in Maine regarding a comprehensive childcare system: Speaker Ryan Fecteau’s bill “An Act to Build a Child Care System by Recruiting and Retaining Maine’s Early Childhood Workforce” and Senate President Jackson’s bill “An Act to Create an Early Care and education Program to Support Children’s Healthy Development and School Success” are two examples. This pandemic has wreaked havoc for childcare in Maine and now is the time to invest in a comprehensive early care and education system. We need to finally recognize the importance of the “care industry”, which President Biden has done by including childcare as part of his infrastructure proposal. There are other federal bills that, if passed, will transform childcare in this country. There is no better time than the present to go big and build a comprehensive birth to five system, and Maine’s CCDF Plan is the place to begin.

Thank you and congratulations to the National Association for the Education of Young Children for its 50<sup>th</sup> anniversary of the celebration of the ***Week of the Young Child*** April 10<sup>th</sup> – 16<sup>th</sup>.

**COMMENTER #6:  
KATIE SOUCY,  
PORTLAND ConnectED**

# Portland ConnectED



April 14, 2021

From: Katie Soucy  
Director, Starting Strong  
Portland ConnectED

To: Crystal Arbor  
Child Care Services Program Manager  
Maine Department of Health and Human Services

Re: Public Comment on Child Care Development Fund State Plan

Dear Ms. Arbor,

Thank you for your work on Maine's Draft Child Care Development Fund Plan. Starting Strong, a coalition working to ensure all children and families in Portland establish the building blocks for a lifetime of learning, is the early childhood component of Portland ConnectED, Portland's cradle-to-career initiative. Our stakeholders include early childhood educators, families, the business community, health care workers, as well as other early childhood programs. Our membership represents the diversity of our community and each stakeholder uniquely understands the needs of children and their families. On behalf of Portland ConnectED/Starting Strong we offer the following considerations for the plan to strengthen Maine's system of high quality child care.

First, we would like to support and reiterate the comments to Maine's CCDF Draft Plan offered by our partners at the Maine Association for the Education of Young Children and the Family Child Care Association of Maine.

In addition, we are supportive of the goals outlined by Maine's PDG Strategic Plan and the Children's Cabinet Priorities and would recommend exploring any and all opportunities to align Maine's Child Care Development Fund Plan to these efforts.

Specifically, we believe in efforts to increase access to child care with systems that offer "no wrong door" for families and are tailored to meet the needs of our community. In greater Portland, we believe a coordinated service hub that includes the capacity to assess our diverse community needs with specific attention to cultural and language considerations is imperative. We support efforts to advance equity and recommend that the CCDF Draft plan include a system designed to meet the particular cultural, linguistic, and socioeconomic needs of communities in a way that builds relationships and trust, invites partnerships, and benefits everyone accessing the system.

In addition, the use of contracts can directly be tied to equitable access for children who need access to high quality child care the most: under-resourced children, infants/toddlers, children with special needs, children with linguistic and cultural backgrounds, children experiencing homelessness, and children who need non-traditional hour care. Contracts reserve slots for certain children while providing child care providers with stable income. Capacity to provide contracts can be increased by utilizing regional, coordinated service hubs for implementation.

We also recommend efforts to support the workforce. We commend the work done by MRTQ PDN and the collaboration with the Lead Agency to support educators enrolling in the PDN. This helps move Maine forward in supporting quality and collecting data about the workforce. However, we know we cannot have retention in the child care workforce without supporting increased wages and benefits. Training, education, and experience are often not enough to get the workforce out of poverty level wages, therefore there is little incentive to remain in the field. We recommend prioritizing any opportunity within the CCDF plan to support the increase of wages and benefits.

Thank you for your tremendous effort planning for and administering the CCDF in Maine. We hope our feedback strengthens your work and that together we can create the strongest system of early childhood education possible.

Thank you,  
Katie Soucy



**COMMENTS #7:  
RITA FURLOW,  
MAINE CHILDREN'S  
ALLIANCE**

**Maine  
Children's  
Alliance**



April 14, 2021

Crystal Arbor  
Child Care Services Program Manager  
Office of Child and Family Services  
11 State House Station  
2 Anthony Avenue  
Augusta, ME 04333-0011

RE: Comments on Proposed Maine Child Care and Development Fund Plan

Dear Ms. Arbor:

Thank you for providing the opportunity for public comment on the proposed Child Care and Development Fund (CCDF) Plan for FFY 2022-24. We appreciate the Department's efforts and time to develop the state plan. In addition, we thank the staff at OCFS who have worked to improve access to child care subsidy by simplifying the application process, placed an emphasis on quality care for children, and worked to improve access to infant care.

The Maine Children's Alliance (MCA) submits these comments as part of our mission to improve the lives of Maine's children, youth, and families. By collecting and analyzing data on children and their health, economic and educational status, MCA seeks to link research to practice and public policy. We bring diverse groups together in coalitions, such as Right from the Start, to support policy initiatives that benefit children, provide oversight in state policy arenas, and serve as a resource on child and family policy issues at the state and federal level.

Changes in our economy have resulted in increasing pressures on Maine families. With over 70 percent of Maine children under the age of six having both parents working to make ends meet, families need more resources available to help them care for their children.<sup>1</sup> A high-quality system of child care that meets the needs of children and families is essential to not only the healthy development of young children but to the

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<sup>1</sup> Children Under Age 6 With All Available Parents In Work Force, Annie E. Casey Foundation, KIDS COUNT Data Center, <http://datacenter.kidscount.org>

Maine economy. Research shows that working parents who receive child care assistance experience fewer missed days, schedule changes, and lost overtime hours.<sup>2</sup>

As you consider comments and changes to the state plan, we urge you to prioritize the needs of working families who struggle to find child care they can afford. Parents are struggling to work full-time, locate and pay for child care, and manage all of their personal and professional responsibilities while raising young children.

MCA believes the Department should take steps to improve consumer education and outreach to parents. There are thousands of families who are eligible for child care subsidy services who are not receiving them. We are concerned that many of these families may ultimately be utilizing inadequate or unsafe child care because of their lack of awareness or intimidation of the subsidy system. We believe families need more one-on-one supports as they try to locate care and understand the child care system and their options.

We urge the Department to utilize future federal funding to improve the state's infrastructure and data systems to simplify the eligibility process by utilizing other DHHS and state databases that already maintain data on children and families. Requiring parents to repeatedly provide the same information to multiple state systems is frustrating and often viewed as a roadblock by parents. We believe improving data systems to simplify payments to providers could also encourage more participation by early childhood educators in the subsidy system.

We applaud the Department's investment and support of the Early Childhood Consultation Partnership. We urge further expansion throughout the state as additional federal funding is available. This service to children, families, and educators comes at a critical period in time for our state as families and those that support them have been under tremendous stress and exhaustion.

We hope this three-year plan is just the beginning and can steer us down a road recognizing the importance of child care to families and their children, providers, and Maine's economic future.

Thank you for your consideration of these comments. We appreciate the many hours that staff have spent creating the state plan and responding to stakeholder input.

Sincerely,

Rita Furlow  
Senior Policy Analyst

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<sup>2</sup> Parents and the High Cost of Child Care 2015 Report, Child Care Aware, <http://usa.childcareaware.org/wp-content/uploads/2015/12/Parents-and-the-High-Cost-of-Child-Care-2015-FINAL.pdf>

**COMMENTER #8:  
MEMBERS OF THE  
CHILDREN'S CABINET EARLY  
CHILDHOOD ADVISORY  
COUNCIL**

**Children's Cabinet Early Childhood Advisory Council**

181 State House Station

August, ME 04333

April 14, 2021

Crystal Arbour  
Child Care Services Program Manager  
Maine Department of Health and Human Services  
Office of Child and Family Services

Dear Ms. Arbour,

The Children's Cabinet Early Childhood Advisory Council is pleased to submit comments on the Child Care Development Fund State Plan for 2022 through 2024. We appreciated the opportunity to discuss the draft Child Care Development Fund State Plan with staff from the Office of Child and Family Services (OCFS) at our March meeting.

We want to start by acknowledging the efforts and initiatives being implemented by OCFS to improve access to quality early care and education and the increased partnerships that have been formed between the Office of Child and Family Services, other state agencies and community partners since the previous CCDF State Plan was drafted. The Council appreciates and strongly supports OCFS's new initiatives, such as the weekly stipend for infants on the Child Care Subsidy Program, the grants to support programs to improve quality, the funding for T.E.A.C.H. and the implementation and expansion of the Early Childhood Consultation Partnership pilot sites. These initiatives will strengthen our early care and education system in Maine by increasing access to needed infant care, improving quality of programming and supporting early childhood educators to access post-secondary degrees. We are pleased with the direction of the CCDF plan and the efforts of OCFS to collaborate across agencies to strengthen programs and systems for young children.

We do want to expand upon two of the concerns that council members raised in our conversation with staff from the Office of Child and Family Services.

- 1) We believe that the Child Care Choices website cannot sufficiently take the place of the now dismantled Child Care Resource and Referral System. While the Council is pleased with the recent upgrades to the Child Care Choices website and agree that the website is a helpful resource for families searching for child care, we are concerned that a website cannot provide the support that many families need to access care and services for their young children. We understand that staff at OCFS are not interested in reestablishing the same Resource and Referral Network that previously existed. We are very interested, however, in having a discussion about establishing a new system or process that helps parents to learn about and access not only child care options and the child care subsidy program, but an array of services for children, including early intervention services, health care treatment and services and nutrition assistance.

In our meeting, Sue Powers from the Aroostook County Action Program (ACAP) explained that ACAP has continued to help families in Aroostook County to access child care and the child care subsidy program. Recently, a child care center closed in their community, ACAP staff helped to connect the families to OCFS to be determined eligible for CCSP and connect as many families as possible to child care in the local area. In addition when people come through the door, staff at ACAP meet with parents and determine if the child might be eligible for Head Start or a child care subsidy as well as other programs. The other child care providers on the Council report that they and their colleagues regularly receive calls from parents searching for care and services. Because there is not a person or agency to send these families to receive information about services, many providers spend time educating these families about child care choices, the child care subsidy program and other services even when they are unable to offer them a slot in their facility. We respect the decision not to return to the traditional Child Care Resource and Referral System, but we feel strongly that some parents do need someone to talk to, in order to understand their options and the services for which their children might be eligible.

- 2) We are concerned that many eligible parents are unaware of the Child Care Subsidy Program and the Child Care Choices website. We understand that OCFS and Maine Roads to Quality have developed brochures and are focused on sharing this information as widely as possible. We would be very interested in thinking with staff about effective outreach strategies to increase enrollment in CCSP and usage of the CCC website and we could also commit to spreading the word through our networks and in our own communities. We recommend a targeted outreach campaign that brings information directly to new parents and parents with young children by spreading the word about CCSP and CCC through trusted providers, programs and organizations. For example, information about CCSP and CCC could be provided in packets for new parents while they are at birthing hospitals and/or provided to pediatrician offices to share at well-child visits.

We appreciate the increased efforts and initiatives at OCFS to expand access to quality care in Maine. As members of the council, we are very interested in continuing to share our insights and experiences with the team at OCFS to inform and strengthen efforts to help Maine families access the very strong and supportive resources available to them.

Thank you for your partnership and for your consideration of these comments.

Sincerely,

Members of the Children's Cabinet Early Childhood Advisory Council