



Comments on the Child Care and Development Fund (CCDF) Plan for NJ for FFY 2022-24

May 25, 2021

Thank you for the opportunity to comment on the CCDF Plan for New Jersey for FFY 2022-2024. The SPAN Parent Advocacy Network (SPAN) is New Jersey's one-stop for families of children birth to 26 across systems; our special priority are children and families at greatest risk due to poverty, disability and special healthcare needs, discrimination based on race, ethnicity, immigrant or language status, or other special circumstances. Family Voices-NJ is the New Jersey affiliate for Family Voices, dedicated to supporting the family voice in children's healthcare. SPAN also serves as the home of the NJ Inclusive Childcare Project, Parent-to-Parent USA affiliate for NJ, NJ Parent Training and Information Center, Family to Family Health Information Center, and the state organization for the National Federation of Families for Children's Mental Health. Our comments today are based on our extensive experience providing support to families and professionals around childcare, particularly inclusive childcare, as well as screening, the EI and special education systems, and other early childhood issues.

1. Define CCDF Leadership and Coordination with Relevant Systems and Funding Sources

We strongly support the lead agency policies on disclosure of confidential and personally identifiable information as a covered entity under HIPAA. We support the collaboration of DHS with TANF and SNAP with childcare and membership in the Council for Young Children. We strongly support collaboration with Parts B/C under IDEA and appreciate the longstanding collaboration with SPAN as a family-led, family-serving organization.

2. Promote Family Engagement Through Outreach and Consumer Education

We encourage a specific mention in the draft regarding the need to avoid the inappropriate use of restraints. We were pleased to see collaboration between DHS and DOE to prevent suspension/expulsion. We also strongly support the policy on developmental screenings. We are excited to be leading the effort in our state, with DHS DFD support, to bring the Pyramid model trainings to parents at last!

3. Provide Stable Child Care Financial Assistance to Families

We agree with prioritization of child care based on special needs, income/TANF, and homelessness and grace periods for vulnerable families. We strongly support continuity of care and no terminations in 12 months due to increased income. We agree with consideration for reduction in hours, seasonal work, etc. We are concerned with the option of discontinuing assistance under 3.4.2 job search, especially during the pandemic. We question why under 3.4.3.c. (reporting income changes) and 3.4.4. (preventing job disruption) online forms are not utilized.

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4. Ensure Equal Access to Child Care for Low-Income Children

We strongly support identifying and addressing shortages, establishing payment rates, and again appreciate collaboration with SPAN to support developmental screening, early identification of needs and connection to resources, preventing and appropriately addressing challenging behavior, and effectively including young children with disabilities in typical early childhood settings.

5. Establish Standards and Monitoring Processes to Ensure the Health and Safety of Child Care Settings

Although we support the various health and safety policies, we find that medication administration is still a barrier for inclusion.

6. Recruit and Retain a Qualified and Effective Child Care Workforce

Here again we appreciated collaboration with SPAN on trainings. As 1 in 5 children has a disability, professional development on special needs is essential for inclusive child care. We also support participation on the Map to Inclusive Childcare Team, of which SPAN is a founding member.

7. Support Continuous Quality Improvement

We strongly agree with a needs assessment to address unmet child care needs. As stated above, we appreciate collaboration with SPAN to address child care quality. We strongly support the Child Care Health Consultants and CCR&Rs and their importance.

8. Ensure Grantee Program Integrity and Accountability

We support accountability and enforcement of sanctions due to program violations.

Appendix A

We agree with the temporary waiver of the Market Rate Survey due to the impact of the COVID-19 pandemic.

Thank you again for the opportunity to comment on the CCDF Plan for NJ. We look forward to our continued collaboration so that all NJ families can access affordable, quality child care in our state.

Sincerely,



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To empower families and inform and involve professionals and other individuals interested in the healthy development and education of children, to enable all children to become fully participating and contributing members of our communities and society.