

Maine's 2016 CCDF Plan  
**A Guide to Provide Public Comment**

**Introduction**

The information below is a template for interested parties to draft written comments on Maine's CCDF Plan to submit to the Department of Health and Human Services. Written input must be sent to [Elissa.Wynne@maine.gov](mailto:Elissa.Wynne@maine.gov) no later than midnight on February 13, 2016

This "sample" input does not tell you what to think. It only offers ideas and examples for consideration. The contents can be borrowed or revised to help formulate your own or your group's own thoughts on Maine's current child care system and on the changes contained in the proposed plan. If you submit input it should reflect your thoughts and the experiences and needs within your community and among the families you serve.

*\*\*Please note that the messages in the table below that are both italicized and highlighted are intended for you and not as part of the comments for the CCDF Plan.\*\**

**Sample Input Template**

To whom this may concern:

My name is \_\_\_\_\_. I am the director of \_\_\_\_\_ Child Care Center/ Family Child Care. I am writing on behalf of \_\_\_\_\_, representing \_\_ families, including \_\_ children. Our program is at Level \_\_\_\_ on the QRIS. About \_\_% of our children are on voucher.

Thank you for the opportunity to comment on Maine's proposed CCDF plan. Our program and our families certainly experience challenges in the current system, but we look forward to improvements that the new plan can bring.

Before addressing specifics in the plan, I/we would like to air some of our grievances with the current system.

Application and Eligibility:

The application is confusing and frustrating, even for those of us who are familiar with it. Here are some of the main concerns:

- The wording is difficult to understand for both native and new English speakers. We often have to help parents figure out what information is need.
- There is no help available specifically for parents/guardians who speak English as a second language.
- There is little to no help available in the application process. While there are numbers to call, parents are often put on hold for hours. Working parents are unable to wait on hold so often times we have to do it for them.
- Documents get lost and replacing them requires time and resources.

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Provider Payments:

Right now, providers are paid at the 50<sup>th</sup> percentile of the market rate, which are insufficient to cover the costs of providing quality care. In addition, payments are often delayed which put stress on the financial health of programs and create a disincentive for programs to participate in CCDF. This jeopardizes and/or limits families' access to services.

General Comments:

The federal government has set a number of goals for CCDF, including: quality; continuity of care; increased accessibility and additional stable support for families; providing developmental information to families; families' involvement in their children's care; promotion of all-around healthy development; and improvements in the knowledge and skills of the workforce. We support these federal goals.

I/we believe Maine's plan outlines improvements either already achieved or planned. I/We hope more can be done in certain areas, but the progress described in the plan in areas, such as streamlining eligibility determination and paying providers in a more timely fashion, is appreciated.

The 2016 Maine State CCDF Plan:

CHAPTER/ PAGE	SECT	COMMENTS/SUGGESTIONS
CH ONE		LEADERSHIP and COORDINATION
118-119	1.2.2	We hope that Public Consulting Group will gather input from parents and providers on what should be included in the "new child care system." Different communities have different characteristics and needs.
12 - 22	1.3, 1.4	The development of the plan was open and input has been accepted. Thank you.
24	1.6	Funds are being blended at the local level by individual agencies, e.g. CCDF funds provide wrap-around care for Head start children in some locations.
CH TWO		CONSUMER and PROVIDER EDUCATION INFORMATION

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31	2.1.2	<p>What is described for the applicant process looks promising. We would also like you to consider:</p> <ol style="list-style-type: none"> <li>1. Providers often have to help parents with their applications, functioning as quasi-ombudsmen. Is there any chance some of them could be trained and compensated for fulfilling this role? Getting to regional offices is a challenge for many parents, so having local assistance from providers would help them considerably.</li> <li>2. Could foreign-language translations be provided?</li> <li>3. There is no margin for error in determining eligibility. We hope OSI staff receive enough training to differentiate the eligibility criteria among CCDF, TABF, WIC, and SNAP?</li> </ol>
32	2.2.1	<p>In the middle of the page Maine certifies with an “X” that it has disseminated policies on (among other things) social-emotional behaviors, positive behavioral support models, and expulsion of preschool-aged children receiving CCDF from programs. However, on page 41 (2.2.7c) Maine certifies that it has no policy on preventing expulsion of these children. These entries seem to contradict each other. Is this an oversight?</p>
40	2.2.7b	<p>In the second paragraph, third line, is the phrase “preventing expulsion.” The word “preventing” can be perceived as positive, especially considering the reference to building “cross-system supports” later in the same paragraph. However, it can also be, and has been, perceived as threatening, because it could mean that DHHS will impose controls on whether any child can ever be expelled.</p> <p>Definitions of the word “prevent” include “forestall,” “avoid,” and “avert,” all of which would be less threatening in the context of expulsions. Other meanings, however, include “to deprive of power” or “to veto.” While programs might willingly work with families and support agencies to help children succeed in their programs, they might also be alarmed if they think that DHHS will try to control their option of expulsion through the power of regulation or statute.</p> <p>On page 41 (2.2.7c) the federal government also uses the phrase “preventing expulsion,” so one could understand why Maine would use that phrase on page 40. Nevertheless, unless Maine actually intends to try impose controls on expulsions, we ask that the word “prevent” be removed and a different word or phrase be substituted.</p> <p><i>(All definitions and synonyms used here were drawn from Webster’s Collegiate Dictionary and Roget’s Thesaurus.)</i></p>
CH THREE		PROVIDE STABLE CHILD CARE FINANCIAL ASSISTANCE to FAMILIES

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57	3.1.8	Maine was given an option here of setting a time limit for eligibility determination, but it declined. This is disappointing. Standards are set for parents to meet, and for providers to meet. If Maine is to have a smooth-working “new child care system” (Chapter 1), then the third part of the system, DHHS, should meet standards as well. It is hoped that once Public Consulting Group has helped Maine design a new system and people have been trained, that a time limit for determining eligibility can be set. This will help parents and providers complete the enrollment process and get children into care more quickly.
62	3.3.1	Maine confirms a 12-month eligibility period, but maintains that it will conduct “spot checks” for accuracy and eligibility. The two concepts are contradictory. Either Maine will have 12-month eligibility or it will not. And, since the eligibility-determination process already demands accuracy, there is no obvious justification for checking it again later. Please remove spot checks.
63-64	3.3.2	<p>On page 63, the federal government requires states to provide three months of child care if a parent loses employment or stops attending a training program. On page 64 Maine confirms that it will provide the three months of care, but at 20 hours/week. It is requested that Maine revise the plan to state that 12 weeks will provided at the same level as before the transition.</p> <p>Justifications are:</p> <ul style="list-style-type: none"> <li>• Pending federal child care regulations require 12 weeks of support at the same level. Making the change now will relieve Maine of the work of submitting an amendment later;</li> <li>• Finding employment is a full-time job and full-time care is needed;</li> <li>• Changing enrollment from full-time to part-time disrupts providers’ enrollment and finances. The slot could also be lost, disrupting the continuity of care.</li> </ul>
64-65	3.3.3	On page 63, the federal government makes clear that it does not want parents’ employment or training disrupted by states’ requirements for re-determination. An example is provided of allowing parents to verify income and employment electronically. On page 64, Maine has three paragraphs of text, but it does not clearly state that it will avoid disrupting employment or training. Any skepticism of Maine’s intent could be removed if DHHS would insert a clear statement about avoiding disruption and verify what is already described on page 31 regarding uploading documentation electronically. Perhaps other options that parents might use to submit documentation could also be included.
76	4.3.1	The increase for payments from the 50th to the 60th percentile does not fully cover the cost of providing quality care, but it helps and is appreciated.
78	4.3.2	Thank you for putting the practice of paying for quality “bumps” put into written policy.

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82	4.5.2	<p>The promise of prospective payments as reflected in the text at the first unchecked box will help stabilize the finances of current CCDF providers and give an incentive to other to join or re-join.</p> <p>The option of paying for enrollment instead of attendance, which Maine did not choose, would not cost more than the option chosen on page 83, but it would ease providers' workload by not requiring them to count hours of absence.</p>
83	4.5.2	<i>Providers should make their own judgments about whether the upper state paragraph, which requires tracking the number of hours of absences, warrants comment, or whether you want something as simple as "Pay for enrollment, not attendance (see p.82, unchecked box at the bottom)."</i>
85-86	4.6	<i>Those having creative ideas for increasing supply or quality of care for the groups listed should submit those ideas here.</i>
CH FIVE		STANDARDS for MONITORING PROCESSES for HEALTH and SAFETY
118-119	5.3.1	Maine's failure to conform to the standard of using the FBI fingerprint check (p.118, top) is disconcerting. Why should young children not be protected by the same measures that protect Maine's school children? All school staff must be fingerprinted, so why not child care staff? And do the policymakers realize that this will cost Maine \$800K? Think how many slots \$800K would support. We definitely think this decision deserves another look.
121	5.3.2	An automated, online system will be a welcome improvement.
CH SIX		RECRUIT and RETAIN A QUALIFIED and EFFECTIVE WORKFORCE
		<i>If providers have ideas about recruiting or training the workforce (MRTQ, PDN, TA), this is where those ideas should go.</i>
CH SEVEN		SUPPORT CONTINUOUS QUALITY IMPROVEMENT
154	7.6.2	Measuring progress in improving the quality of programs by the number of programs at levels 3 and 4 and the number children enrolled in those programs is reasonable and we support this standard. In addition, we think that this data should be made public annually and posted on the Department's website, along with previous years' data, so that we can track how we as a state are doing.

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154	7.6.2	<i>Having more programs at Levels 3 and 4 will help Maine achieve the goal of having more children that receive CCDF attending programs at levels 3 and 4. Consequently, if providers have ideas for support (training, equipment, admin support) that would help them reach level 3 or level 4, citing this section could help justify their ideas.</i>
CH EIGHT		PROGRAM INTEGRITY and ACCOUNTABILITY.
		<i>No comment.</i>