

	CCDF Section 1 Comments	CCDF Section 1 Lead Agency Responses
Subsection 1.1 – 1.3	Use <ul style="list-style-type: none"> • CCDF Leadership • Policy decision authority • consultation in the development of the ccdf Plan 	The Lead Agency made many grammatical edits and language changes in the new plan based on received comments.
Subsection 1.1	Leadership will be mandated to give summary of items during Provider meetings. Many administrators are in classrooms due to staffing shortages, so reading the entire hundred plus pages might not be feasible. Provide document in reduced format so ECE community is fully aware of all changes coming our way. Provider meetings need to be mandated to covered this material. Provide slides with this information so it can be easily digested and understood. It's not that administrators do not care, it's they are already stretched, if they can't read and digest, how can the teachers that make up our classrooms understand what is happening. Provide easy to understand documents for the ECE general public.	<p>The Lead Agency appreciates the desire to have an easily digestible version of plan content available publicly.</p> <p>A bulleted synopsis of content will be made available during the CCDF Idea Meeting phase of the plan process. A synopsis of the CCDF FY25-FY27 Plan Amendment will be made available when it is written.</p>

	CCDF Section 2 Comments	CCDF Section 2 Lead Agency Responses
Subsection 2.1	Section 2.1.2. <i>Preventing disruption of eligibility activities.</i> The YMCA of Delaware would like to encourage the lead agency to consider working with providers, including YMCA Childcare Registrars to help navigate redetermination and access to hardship justification funds, presumably alleviated by TANF assistance.	<p>The Department of Health and Social Services will consider how to expand its work with providers to assist with families' redetermination and access to hardship justification funds in our CCDF FY25-FY27 Plan Amendment.</p> <p>This would be expedited by the merger of Division of Social Services and the Division of State Service Centers, effective in state fiscal year 2024.</p>
Subsection 2.2	Section 2.2.1. <i>Age of children served</i> The YMCA of Delaware is encouraged to see the inclusion of children ages 19 and younger for those with special needs covered by the plan. We look forward to working with the Lead Agency to increase availability for quality care for children ages	The Lead Agency can appreciate the need for services for this age group and the YMCA's desire to serve them. Funding for this age group would need to come from a funding source other than CCDF, such as state general funds, because the Lead Agency is

	<p>13 – 19 that is open to all, regardless of diagnosis. We encourages the lead agency to consider extending services to children up to age 16. Youth ages 13 – 15 need a safe place to go after school, and therefore the YMCA would appreciate the opportunity to serve these children with support from CCDF.</p>	<p>federally prohibited from using CCDF funds for children over the age of 12.</p>
Subsection 2.2	<p>2.2.2 : a : iv. - Participating in unpaid activities like student teaching, internships, or practicums. I believe that this should be checked as someone working towards getting their GED, diploma, or college degree (which is included in section c below). Many times college courses require student teaching and/or practicum to earn the degree, especially in education. However, I believe that the recipient should show documentation as proof to have this approved.</p> <p>2.2.2 : c - includes education "Identify which of the following diplomas, certificates, degrees, or activities are included in your definition of "attending an educational program" by checking the boxes below:"</p> <p>2.2.2 : d - should have education checked</p> <p>2.2.2 : f - Kinship Care should be checked. The financial burden of childcare costs should not fall on guardians who are providing care for family members children under Delaware's Kinship Care Program.</p>	<p>These suggestions will be presented to Lead Agency leadership for consideration.</p> <p>There is a process for the Lead Agency to edit its eligibility criteria for families receiving subsidy. This process starts with presenting suggestions to DHSS leadership and calculating the fiscal impact of these changes. These criteria changes may require online system enhancements for Case Workers to be able to choose these options and approve them online.</p> <p>If these changes are approved, it will be written into our Division of Social Services Policy Manual, which dictates the policies of all of the state's social service programs.</p>
Subsection 2.2	<p>Section 2.2.2. <i>Reasons for Care</i> The YMCA of Delaware encourages the lead agency to include the following activities to be included in the definition of "working":</p> <ul style="list-style-type: none"> • During a time of emergency or disaster, partnering in essential services. <p>Other, to be described as family medical leave including maternity and paternity leave</p>	<p>The Lead Agency will consider redefining the term "work" to possibly include the two referenced categories.</p>
Subsection 2.2	<p>Section 2.2.4. <i>Eligibility</i></p>	<p>The Lead Agency is committed to ensuring that families who need financial assistance with child</p>

	<p>The YMCA of Delaware is grateful to the Carney Administration and the Delaware General Assembly for committing to raise the Federal Poverty Level for eligibility for Childcare Subsidy to 200%. We encourage both the Lead Agency and the State Legislature to consider raising it to 250% of Federal Poverty to come closer to the eligibility levels of our neighboring states, attracting more working families to our state and ensure that families with two working parents making minimum wage could qualify for the subsidy.</p>	<p>care receive it. The Lead Agency will continue to consider the eligibility criteria as funding permits.</p>
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	CCDF Section 3 Comments	CCDF Section 3 Lead Agency Responses
Subsection 3	<p>Section 3 <i>Child Care Affordability</i></p> <p>The YMCA of Delaware is encouraged to see the copay rate of 7%, however we encourage the Lead Agency to heavily consider the recommendations detailed in the CCDF plan as follows, "Lead Agencies are encouraged to set co-payments much lower than 7% to make child care more affordable for families and have broad flexibility to waive co-payments for many participants."</p>	<p>The Lead Agency is committed to ensuring that childcare is accessible for families who need it and will continue to consider measures to also ensure affordability. In addition to capping co-pays at 7% of income, any family at or below 150% of the FPL will have their co-pays waived.</p>
Subsection 3.1	<p>Family can lose their POC benefit for not following policies in Provider Parent Handbook. There has to be accountability for families that have the POC benefit just like with providers if POC guidelines not followed. For instance, going over 10 absences (do not count for provider or family if doctor note), lose the benefit, not paying tuition on time since no late fee can be charged, in order to keep programs engaged with POC, there needs to be accountability for families and the programs. More accountability for the family, right now none,. Families bounce from provider to provider because programs enforce their Parent Handbook which hurts the children; example, center closes at 5:30pm, family picks up at 6pm or after repeatedly, center incurs o/t, can't bill because under 10 hours, no consequence to family, they can go to next center and get care.</p>	<p>Families are held accountable if they breach POC policies. Families need to sign agreements to take their children to child care.</p> <p>Providers cannot charge late fees because it is punitive to the family.</p>

Subsection 3.1	<p>Section 3.1.2 <i>Sliding Scale Fees (ei, eii)</i> The YMCA of Delaware encourages the lead agency to recognize the cost of providing care is the same regardless of the center's geographical location and recommends a statewide rate. The YMCA of Delaware does not see the Purchase of Care Plus model as a viable solution for providers and families living and working in Kent and Sussex Counties. This is evident with Kent and Sussex counties determined as "childcare deserts" due to the low number of providers and most of whom do not accept childcare subsidies.</p>	<p>The child care reimbursement rate is a statewide rate as of July 1, 2024.</p>
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	CCDF Section 4 Comments	CCDF Section 4 Lead Agency Responses
Subsection 4	<p>Section 4 Special need rates should increase regardless. All POC rates across counties should be the same as the cost of living is the same.</p> <p>Address the increase in cost for centers who actually accept children with special needs. our GL tripled because over a certain percentage of our children have extra needs.</p>	<p>The Lead Agency recognizes that children with special needs might require additional services and providers might incur additional expenses in order to serve them. The Lead Agency has been working with an early care and education stakeholder group to revise the special needs intake process and reimbursement structure for the POC program. A final report with recommendations has been submitted to our state legislature for feedback.</p>
Subsection 4	<p>I wish there was a way to help centers that do NOT use POC Plus.</p>	<p>Both the Department of Education (DOE) and Department of Health and Social Services (DHSS) will consider this group of programs as they develop the plan amendment and all policies that impact programs.</p>
Subsection 4.1	<p>Section 4.1.1 <i>Parent Choice (a)</i> Barriers to provider participation results in lack of parental choice. The YMCA of Delaware encourages the inclusion of these identified barriers:</p> <ul style="list-style-type: none"> • Inequitable reimbursement rates based on geographical location • Reimbursement rates not covering the actual cost of care 	<p>The Lead Agency recognizes these barriers to provider participation in the childcare subsidy program and is committed to alleviating them. The initial attempt was the option for providers to be POC Plus providers. Because reimbursement rates are now statewide rates, all providers will</p>

	<ul style="list-style-type: none"> • Reimbursement rates based on child's attendance rather than enrollment • Insufficient notification with changes of a child's eligibility • Insufficient notification with changes in a child's co-payment • Insufficient notification with a family's authorization. 	<p>be paid at the state rate regardless of their private fee. We will be working with our ISU team to address the referenced concerns regarding the notification process.</p>
Subsection 4.2	<p>Section 4.2.1 <i>Access to the Market Rate Study</i> The YMCA of Delaware participated in the Market Rate Study by submitting a spreadsheet with all required information for all its licensed programs. As of June 6, 2024 the results of this survey have not been released and to the public's knowledge, are not reflected in the State's Plan.</p>	<p>The results of the Market Rate Study can be found on the DHSS website by clicking on the following link: 2024 Delaware Final Report</p>
Subsection 4.2	<p>Section 4.2.2 <i>Cost Analysis</i> The YMCA of Delaware celebrates the Lead Agency's assumptions that included cost of meeting basic licensing requirements, salaries, etc., and encourages the Lead Agency to include the additional following assumptions and data to determine base cost of care:</p> <ul style="list-style-type: none"> • Inflation • Cost of goods and supplies <p>Healthcare costs</p>	<p>The Lead Agency consulted with the provider community to develop assumptions. If any of the cited assumptions were not included in the current model, they can be added as the cost estimation tool is updated.</p>
Subsection 4.4	<p>Providers need to be able to recoup legitimate costs such as those noted and maybe there's an approval process for providers to submit costs to POC for approval to bill a family. For instance, we issue a sensor to open the front door, replacement costs with labor and the sensor is about \$30.00, but we can't bill the POC families for losing them. For costs that are approved, the provider provides their Parent Handbook? Anything in that handbook is billable as conditions of care? There needs to be accountability for late payments, lost items, incurrence of labor due to late pick ups, supplies not brought and other expenses that are legitimate that programs are incurring. 10 day absences is a help, but in all honestly if a doctor's note is provided, that should be 0 and the</p>	<p>Once the new rates are in place in July 2024, DHSS will pay providers the current POC rate. There will be no differentiation of rate based on your private pay rate.</p> <p>The state POC rate is an all-inclusive tuition rate that includes these fees.</p> <p>POC families are advised of their rights and responsibilities at intake. For example, they are required to pay co-pays and if they are not able to pay, they should make arrangements with the provider to make payments. If a family is not making agreed-</p>

	<p>provider should be paid if over the 10 days due to illness of a child.</p>	<p>upon payments the provider should alert their Child Care Monitor who will ensure that the family is not able to simply move to another provider.</p>
<p>Subsection 4.4</p>	<p>Section 4.4.2.c. <i>Other payment practices – Describe how the Lead Agency provides prompts notice to providers regarding any changes to the family’s eligibility status that could impact payments, and such notice is sent no later than the day the Lead Agency becomes aware that such a change will occur:</i> The YMCA of Delaware would appreciate the Lead Agency providing a proactive, “prompt notice” to providers regarding any changes in a family's eligibility, authorization or co-payments. Currently, the YMCA is required to ask trained staff to comb through families accounts daily to identify changes in eligibility status and changes in the roster. As a provider that serves hundreds of families utilizing the state’s childcare subsidy, this time could be better spent. The YMCA of Delaware encourages the Lead Agency to employ an autogenerated notice, alert or email to alert providers of a change in a family’s eligibility, authorization or co-payment status.</p>	<p>The Lead Agency appreciates providers’ need to get information regarding changes to a family’s eligibility, co-pay, etc. in a timely manner and will consider these suggestions while implementing system enhancements.</p>
<p>Subsection 4.5</p>	<p>There needs to be a system for making sure programs are doing their best for proposed staff qualifications. It's a moving target, our counts change daily as people leave the field due to extreme behavioral issues in the classrooms, low pay compared to other industries, and inability to commit to long term education. As teachers come and go (still high turnover) our counts change, one month we might be good, next month, working towards goal again. Someone graduates from college, leaves us for district as we cannot compete. Be flexible in programs meeting the CDA and other requirements, even if just a percent. There is a labor shortage in general, not just childcare, so be aware and be realistic. Administrators are leaving in droves because of the work ethic of staff, stress level, and these updates rules I am sure will drive even more out as there</p>	<p>Our plan will maintain flexible pathways to meet qualification requirements for licensed child care professionals. Currently, the state does not require a CDA for a lead teacher and offers supports to obtain a CDA for professionals who choose to further their careers.</p> <p>DOE is taking the suggestion to consider how to better monitor staff qualifications. We recognize staffing remains in flux due to our labor shortage. This will be considered in our 2024 Delacare Regulation revision.</p>

	is a feeling of never being able to do it brewing at the admin. levels. At any given time, the staffing credentials shift as people come in and out due to the high turnover.	
Subsection 4.5	<p><i>Plan section 4.5.1</i></p> <p><i>Supply Building - Grants and Contracts: Recommendation:</i> Following the encouragement of the Office of Child Care in the comments on the Final 2024 Child Care Rule, we request the Lead Agency mention the state's intention toward increasing supply in school-age child care deserts and other areas of need by investing in school-age child care grants and contracts. Include grant guidelines for grantees to invest in and have resources toward support for high-quality school-age programming.</p>	<p>DOE is taking into consideration the idea to increase supply in school-age child care deserts and other areas of need by investing in school-age child care grants and contracts. This type of investment is a divergence from our state-funded early care and education initiative, but can be considered in future fiscal years.</p> <p>This is under consideration for long-term plans; we will consider adding the idea of school-age child care grants and contracts into our CCDF FY25-FY27 Plan Amendment.</p>

	CCDF Section 5 Comments	CCDF Section 5 Lead Agency Responses
Section 5	Licensing recommendation was having additional staff (more than what regs outline) since we have more kiddos with needs. We need help for funding in that area.	<p>DOE is taking the suggestion to consider different staff qualifications. We recognize staffing remains in flux due to our labor shortage. This will be considered in our 2024 Delacare Regulation revision.</p> <p>DOE will continue its Quality Improvement Awards in fiscal year 2025, with the consideration to continue them through federal fiscal year 2027. DOE is prioritizing quality improvement strategies that help employers recruit and retain child care professionals.</p>
Subsection 5.1	<p>Section 5.1.2.a.</p> <p><i>Licensed Exempt Facilities</i></p> <p>The YMCA of Delaware serves an average of 4,000 children ages 5 through 14 during the summer months when school is not in session. In six out of seven YMCA locations, care is offered in an outdoor setting for 12 weeks, five days a week, 11 hours a day, matching a working families</p>	The Lead Agency appreciates the concern regarding license-exempt child care for children during the summer months; however, CCDF regulations prohibit license-exempt child care for center-based providers accepting state subsidy.

	<p>schedule. Prior to 2021, an exemption was provided for the YMCA of Delaware, allowing families who qualify for childcare subsidy to access year-round care during out of school time hours. The YMCA of Delaware strongly encourages the Lead Agency to consider providing license-exempt center-based childcare within YMCA facilities that offer outdoor educational summer experiences.</p>	<p>Educational outdoor summer experiences are categorized as youth camps. Youth camps that are accepting federal child care subsidy are required to be regulated by the state's child care licensing agency. All facilities that accept Purchase of Care in the state of Delaware will continue to be licensed by the Office of Child Care Licensing.</p>
Subsection 5.2	<p><i>Plan section 5.2.1</i> <i>Barriers to Participation:</i> <i>Recommendation:</i> Plan for the state to have ongoing mechanisms to review licensing and license-exempt regulations for school-age providers as a means to identify barriers to participation. Ensure that regulations that may be necessary for the health and safety of infants and toddlers are not unnecessarily applied to older youth (such as space requirements, transportation requirements, and types of materials that can be used). Do consider additional Safety elements and training- such as how to identify bullying, mental health, or first aid that may be most critical to keeping older youth safe and well. This will help ensure more school-age providers opt to participate in the subsidy system and provide parents with more choices for high-quality environments.</p>	<p>The Lead agency appreciates the concern that regulations may be a barrier to participation as a school-age provider.</p> <p>DOE is taking the suggestion to consider how to ensure regulations are age-appropriate for diverse programs. This lens on regulations will be used for our 2024 Delacare Regulation revision.</p>
Subsection 5.2	<p>5.2.2 : Family Providers Section only lists Level 1 care ratios. Need to include Level 2 care ratios.</p> <p>As a Level 2 provider for over 13 years, I have a suggestion to help increase the availability of childcare. I propose that OCCL develop a Level 3 care with higher ratios for more experienced providers and/or those who are opting to provide preschool age only (like myself).</p>	<p>Thank you for highlighting that family child care ratios needed to be updated in the plan.</p> <p>DOE is taking the suggestion to consider a new Level 3 for large family child care providers. Currently under consideration for higher ratios are the size of the indoor and outdoor facilities, the age of the children, and the experience and education of staff. This will be considered in our 2024 Delacare Regulation revision.</p>
Subsection 5.4	<p>5.4.1 : j - Why wouldn't First Aid and CPR be required at or by hire date?</p>	<p>DOE is considering the suggestion that First Aid and CPR be required at or by the hire date. Currently under</p>

		consideration for this decision is the regular, prompt availability of this training. This will be considered in our 2024 Delacare Regulation revision.
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	CCDF Section 6 Comments	CCDF Section 6 Lead Agency Responses
Subsection 6.1	<p>6.1.1 : b/c - Through the QIS, providers are able to develop a plan and obtain an award to use towards subsidizing their salaries, accessing medical benefits, investing in retirement, etc. In the past, the Child Care Wage\$ program would provide stipends that matched the providers education level attained. I would like to see something like that imbedded into the new QIS plan and award. For example, currently proposed is that a family child care provider can be awarded \$15,000 as a bonus regardless of experience or education level. Only if they accept POC would it be a higher amount. However, if a provider has a degree and 10+ years of experience they get the same amount of \$15,000. But the disparity in pay would - in theory - not be as great. I would like to see a scale that includes an amount depending on education level (CDA & Associates degree / Bachelor's & Master's degree) and the rate of POC children cared for. If you are truly trying to retain the highly educated and high quality providers, you need to consider this. Because what is stopping us from taking a preschool teaching job in the school district to make more money with more time off? (This pertains to 6.2.2 - financing as well)</p>	<p>DOE Education is taking the suggestion to consider embedding aspects of the Child Care Wage\$ program into the Quality Improvement Award policy in future years. This does not result in a change in our CCDF FY25-FY27 state plan because the Quality Improvement Awards are funded with state- appropriated funds.</p> <p>We will also consider this as a new initiative for our CCDF FY25-FY27 state plan amendment.</p>
Subsection 6.1	<p><i>Plan section 6.1.1 Workforce:</i> <i>Recommendation:</i> Mention the state's commitment to ensuring school-age professionals have appropriate school-age or youth development credentials and career pathways designed to meet the specific needs of the ages of youth they serve. Ensure the state's investments and support for the childcare</p>	<p>DOE is committed to ensuring school-age professionals who have part-time or seasonal roles receive professional learning that is tailored to their age group served. At this time, the Quality Improvement Awards allow program administrators to make decisions on how to best support their staff working directly with</p>

	workforce are sensitive to the needs of afterschool and summer workers who may hold part-time and seasonal roles. Allow non-full-time staff to have opportunities for wage bonuses and benefit packages.	children through strategies like wage bonuses and benefits packages.
Subsection 6.2	<p>Section 6.2.1b <i>Updates and Consultations to Licensing Rules and Regulations Revision</i></p> <p>The YMCA believes all children deserve a high-quality education with highly skilled teachers, therefore we support professional development for all childcare professionals. While the YMCA of Delaware is encouraged to learn the Department of Education is optimistic providers will adopt the proposed credentialing initiative due to the temporary increase in quality improvement awards the YMCA of Delaware is concerned the temporary nature of the funds do not lead to a sustainable solution for needed to cover the costs associated with professional development and increased salaries.</p> <p>Once a salary increase is given to an employee by their employer, the employer is bound to the new hourly rate moving forward. The funds proposed by the state to cover that raise are temporary, only available if the quality initiative award program is available and/or sustained. Therefore, employers are choosing to utilize the quality improvement dollars for a one-time bonus to supplement employees as a mechanism to provide incentives in a sustainable manner.</p>	<p>DOE has not yet released proposed qualification regulations changes for public comment. DOE has and will continue to consider the cost of maintaining increased salaries in turn for more rigorous professional preparation as we revise our Delacare regulations on professional qualifications in 2024.</p> <p>Quality Improvement Awards are available using state-appropriated funding to support programs' outlined goals in their Quality Improvement Plans.</p> <p>DOE is providing flexibility to programs to make decisions on how to recruit, train and retain a highly-qualified workforce for their business. There are many allowable uses for the quality improvement awards to further programs' quality improvement goals. DOE partners with the Delaware Institute for Excellence in Early Childhood technical assistance to ensure program administrators have a clear understanding of how to use one-time revenue towards budget line items that benefit staff.</p>
Subsection 6.2	More of a comment, early education programs that are private, are overlapping with district supported programs. When this happens, the private programs are at a disadvantage because we cannot compete with state benefits. To spread out quality among all of the programs, please consider this angle. Paraprofessionals, because of the labor shortage, are being taken from early education programs that worked	<p>DOE respects the competition for qualified professionals within a mixed delivery system that supports both public state employees and private business employees.</p> <p>The DOE Early Childhood Support team will consider differentiating state-appropriated grants and awards depending</p>

	<p>hard to get that person through their education. Bonus for qualified staff that obtain their credentials that stay in private programs to support the mixed delivery model. Often times, the private programs make sacrifices such as reduced schedules, to support that individual; then they leave for the district. Make the playing field more even for private programs that have our staff recruited because we have done such a great job encouraging more education.</p>	<p>upon program's revenue type to support retention of staff.</p>
<p>Subsection 6.2</p>	<p>I would like to see opportunities for providers and educators, like myself, who have their Bachelor's degree to be able to continue in their education pursuing Masters degrees through support of ECIC or other State funding.</p> <p>6.2.3 : "Conversely, 46.15 % of Family Child Care providers reported being in their current role for more than 20 years compared to 1.67% in Centers. Based on these findings, Delaware will work on a marketing campaign to recruit family child care providers considering the longevity of the career and work to retain child care center educators." I agree with this as family child care providers work hard to provide the best care for our children; the pay is low, the hours are long, and the burn out is real. We need the support.</p> <p>6.2.3 : d - Articulation: Part of supporting family child care providers is by funding an annual conference with trainings that are geared just for family child care providers. Currently, DIEEC is contracted to organize and hold an annual conference; however, the issue is that funding is not adequate and they are struggling to find a conference space within budget.</p>	<p>At this time, DOE is choosing to use its limited funding to support professionals in starting their early childhood career journey or improving the quality of their practice towards a CDA, AA, or BA degree.</p> <p>We agree that family child care professionals work hard to ensure the safety, growth development, and learning of our children every day!</p> <p>DOE will consider the importance of annual conferences and trainings within the pathways of professional development available to professionals in all facilities. DOE will continue to follow state procurement laws and negotiate contracts accordingly.</p>
<p>Subsection 6.3</p>	<p>6.3.1 : c - Licensed family child care providers are required to take at least 12 training hour annually. The problem is that there are not many different courses</p>	<p>We have heard the need for new types of online training for veteran professionals. DOE has communicated the shift from</p>

	<p>available and we end up taking trainings we have taken in the past. I would like to see a better variety of trainings offered. Please point providers to a list of outside trainings that are approved in addition to DIEEC or DEPD Now. I have a nature based preschool, I would like to be able to take trainings tailored to nature based programs that would be approved by OCCL.</p>	<p>DEPDNow to other online training options. DOE partners with the Delaware Institute for Excellence in Early Childhood (DIEEC) to offer new trainings to meet this need.</p> <p>We include trainings tailored to nature-based programs in the training accepted by OCCL.</p>
Subsection 6.3	<p>More of a comment, we live in a age of immediate gratification. Make the milestone shorter, break the CDA or other goals into smaller sections and then issue certificates of achievement and bonus money. We are finding that the idea of a long term educational commitment reduces the amount of people that are interested. Career lattice broken up into many hops to allow for this thought process. Waiting for that certificate or degree, while working, isn't enticing. STILL really worried about the ethics of today's workforce too, high turnover and absenteeism among those with the CDA's and other credentials. The education is only a part of the puzzle, you need the dedication and work ethic to use those tools appropriately. Professional Development is also work ethic and professionalism too. The CDA/degree, without the work ethic isn't going to produce quality when there is no consistency in the classroom. Sometimes are hardest working staff are those with ECE1/ECE2 and years of experience and work ethic, and the children are in quality environments. Just because someone has the credential doesn't mean they bring quality to the table, we are finding that out now as a program.</p>	<p>DOE will consider pathway supports in shorter chunks of time in the next fiscal year to better foster engagement and retention of our workforce.</p> <p>DOE considers education and experience as necessary components in professional preparation. This will be discussed as we revise our Delacare regulations on professional qualifications in 2024.</p>

	CCDF Section 7 Comments	CCDF Section 7 Lead Agency Responses
Subsection 7	<p>Section 7 <i>Quality Activities Need Assessment and Use of Quality Set-Aside Funds</i></p> <p>The results of this assessment have not been released and are not reflected in the</p>	<p>We are posting the CCDBG Thematic Analysis document that DOE and DHSS staff reviewed for early childhood policy decisions for the CCDF FY25-</p>

	State's Plan for quality improvement or future funding activity plans.	<p>FY27 on mychildde.org along with the final plan document.</p> <p>As we update our mychildde.org website, we will consider a "needs assessment" page that highlights data reports that inform how DOE and DHSS make decision on early childhood policies throughout the year.</p>
Subsection 7.2	<p><i>Plan sections 7.2.1 (b)(i) and 7.2.1 (b) (iii)</i></p> <p>Quality:</p> <p>Recommendation: Ensure the plan mentions that the state will invest some quality funds toward supporting school-age youth. This can include free and low-cost training for professionals serving school-age youth and ensuring school-age programs have meaningful quality systems aligned to best practices for this age group. School-age youth served with CCDF subsidy will benefit from well-prepared staff and highly rated quality settings to sustain the gains from early learning.</p>	DOE does and will continue to invest in training for professionals serving school-age youth. We appreciate your desire to ensure that school-age youth served with CCDF subsidy will benefit from well-prepared staff in high-quality settings.

	CCDF Section 9 Comments	CCDF Section 9 Lead Agency Responses
Subsection 9.2	9.2.3 : b- Why shouldn't a providers level of education and training be visible to the public? As a parent it may help me decide where I would want my child to go.	<p>DOE is taking the suggestion to consider showing the education level of individual professionals. This type of system would require "individual licensure" which is a divergence from our current system. Currently, we license and monitor programs, and we certify professionals to work in that particular program.</p> <p>This system-wide shift is currently under consideration for long-term plans; we will consider adding the idea of individual licensure into our CCDF FY25-FY27 Plan Amendment.</p>