August 28, 2023

Megan Campbell
Office of Child Care, Administration for Children and Families
Department of Health and Human Services
330 C Street, S.W.
Washington, D.C. 20201

Re: Comments on *RIN 0970-AD02*: Improving Child Care Access, Affordability, and Stability in the Child Care and Development Fund (CCDF)

Dear Megan Campbell and ACF Office of Child Care,

On behalf of the Massachusetts Department of Education and Care (EEC), I submit this public comment in support of the Biden-Harris Administration's proposed rule *Improving Child Care Access, Affordability, and Stability in the Child Care and Development Fund (CCDF).* EEC, primarily through federal funding from CCDF, administers the state's child care financial assistance programs that support access to child care for approximately 58,000 children and their families across the Commonwealth.

The Commonwealth, led by Governor Maura Healey, is making a historic investment in early education and care in Massachusetts, and is working to expand equitable and dignified access to high-quality child care for all families across our communities. Through this effort, we are centering the family voice and restructuring the agency's operations, policies, and procedures to modernize and improve the experiences of the families and providers we serve, as well as the staff at EEC.

This proposed rule aligns closely with our efforts. Early education is foundational to closing the opportunity gap in Massachusetts – bringing economic equity and mobility to families, as well as educational opportunities to their children. Access to affordable child care is also an engine of the state's economy, enabling families of all income levels to participate in our workforce. Ensuring that families receiving child care financial assistance do not spend more than 7% of their family income for child care supports their economic mobility pathway, allowing families to use that money for utilities, rent, and other basic necessities. Further, expanding the ability to waive co-payments for families living at or below 150% of the federal poverty level will make child care more accessible and affordable for families. We hope there will also be consideration of the additional resources needed to implement these welcome changes.

The COVID-19 pandemic exacerbated longstanding fragility in the early education and care system, where programs have long struggled to balance affordability for families with providing sufficient wages for staff and investing in critical quality supports. This proposed rule will support program stability through improved payment rates and practices and encourage new providers to participate in the child care financial assistance system, improving the quality of child care, and expanding parent choice.

EEC looks forward to working with the Administration for Children and Families and the Office of Child Care to implement these changes. We anticipate the changes to the sustainable payment practice will have the largest impact on our agency's technology and operations, particularly the change that requires a move to a prospective payment method. The state therefore requests additional time beyond the usual 60 days to explore the technology, and policy and procedure enhancements needed, as well as any potential changes to the agency's appropriations and program integrity practices.

The proposed rule as written would expand access to child care in Massachusetts, improving affordability for families and stability for programs. We appreciate the Biden-Harris Administration's partnership as we continue to modernize and improve our system for the children, families, programs, and educators we serve.

Sincerely,



Amy Kershaw
Commissioner

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