



ADMINISTRATION FOR  
**CHILDREN & FAMILIES**



FFY 2023-2025 Tribal CCDF Plan Preprint:  
Overview

November 9, 2021  
2:00 PM – 3:00 PM (ET)



# Agenda

- Overview of the Draft Federal Fiscal Year (FFY) 2023-2025 Tribal CCDF Plan Preprint
  - <https://www.acf.hhs.gov/occ/news/60-day-comment-period-open-ffy-2023-2025-tribal-ccdf-plan-preprint>
- Public Comment Process
  - 60-day public comment period
- Plan Submission Deadline

# Welcome



- Comments from Ruth J. Friedman, Ph.D.
- Director, Office of Child Care

# Overview of the FFY 2023-2025 Tribal CCDF Plan Preprint

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# What is the Tribal CCDF Plan Preprint?

The Tribal Lead Agency's application for CCDF funds:

- Describes the Tribal Lead Agency's child care program and services available to eligible families
- Contains specific assurances and certifications required by CCDBG statute
- Provides information about the overall management of CCDF services

Tribes that have consolidated their CCDF program into an approved Pub. L. 102-477 Plan are not subject to the ACF-118a reporting requirement. 477 Tribes will need to submit Child Counts (Appendix 1A) which determines CCDF funding allocations.

# Poll Question

- Have you completed a Tribal CCDF Plan before?
  - Yes
  - No, this will be my first time
  - No, I do not work on the Tribal CCDF Plan

# FFY 2023-2025 Tribal CCDF Plan Preprint

- Moving to CARS online submission process
  - System will be live for FFY 2023-2025 Tribal CCDF Plan submission
  - Technical trainings in spring/summer
  - No amendment log
- Refinements to Preprint
  - Acknowledged variety of ways Tribal CCDF programs are operated
  - Eliminated unnecessary questions
  - Added checkboxes

# Tribal Allocation Sizes

Establishes 3 tiers of CCDF program requirements based on Tribal Lead Agency allocations

## Tribes with Small Allocation

S

Must spend their funds in alignment with CCDF Goals and Purposes

Exempt from the majority of CCDF requirements

Option to submit an abbreviated CCDF Plan

## Tribes with Medium Allocation

M

Allowed the same exemptions as the Large allocation category

Exempt from operating a certificate program

## Tribes with Large Allocation

L

Subject to the majority of CCDF requirements

Some Tribal-specific exemptions



# Tribal Allocation Size Thresholds

- Current thresholds

- Under \$250,000
- \$250,000 to \$1 million
- Over \$1 million

Keep the same threshold?

- 63 Tribes with small allocations move up

Maintain the same proportions

- Allocations stay mostly the same

Increase each allocation size by average increase

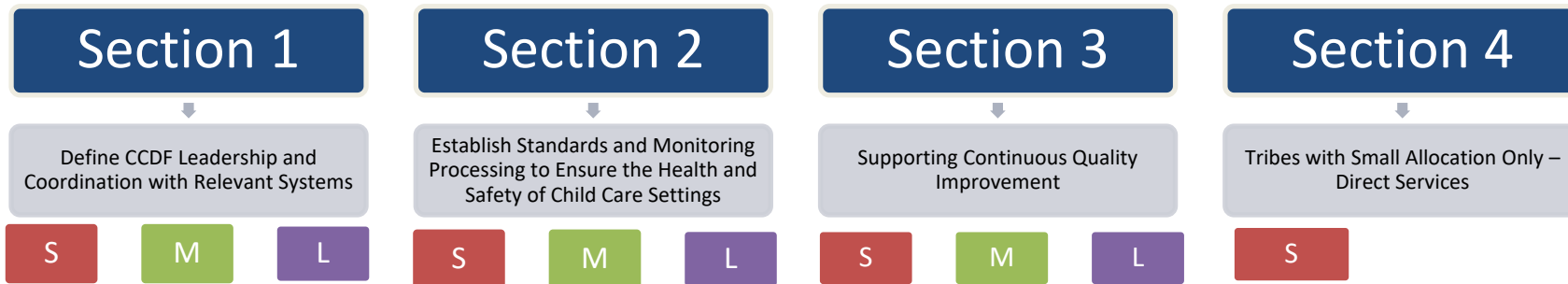
- 14 tribes with small allocations move up

# Poll Question

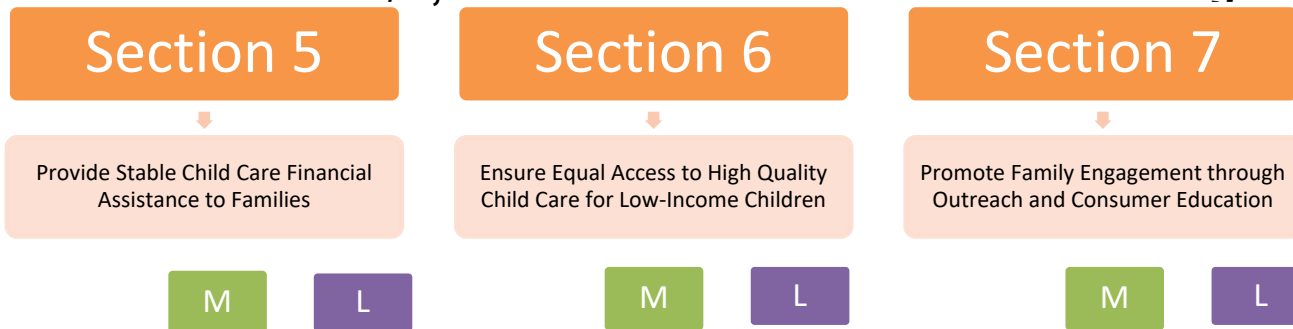
- What is your preference to determining future allocation sizes?
  - Keep the same threshold?  
(63 Tribes with small allocations move up)
  - Maintain the same proportions  
(Allocations stay mostly the same)
  - Increase each allocation size by average increase  
(14 tribes with small allocations move up)
  - I need more time to think about this

# FFY 2023-2025 Tribal Plan Structure

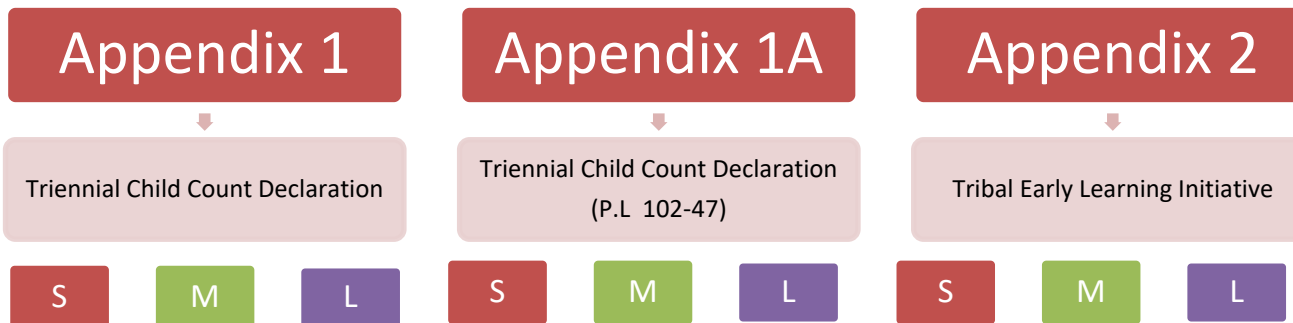
## Part I: Section 1, 2, and 3 for All Tribes (Section 4 - Tribes with Small Allocations)



## Part II: Section 5, 6, and 7 for Tribes with Medium and Large Allocation Only



## Part III: Assurances and Certifications



# Part I

Sections 1, 2, and 3 for all Tribes

Section 4 – Direct Services

(For Tribes with Small Allocations Only)

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# 1. Define CCDF Leadership and Coordination with Relevant Systems

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1.1 Tribal CCDF Applicant

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1.2 Designated Tribal Lead Agency

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1.3 Administration through Contracts or Agreements

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1.4 Consultation in the Development of the Tribal CCDF Plan

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1.5 Indian Child and Indian Reservation or Service Area

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1.6 Child Count

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1.7 Types of CCDF Providers

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1.8 Coordination of Services

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1.9 Program Integrity and Accountability

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1.10 Disaster Preparedness and Response Plan

## Section 1 – Key Changes



- 1.6 Child Count – Child count (Appendix 1) will be submitted through the CARS system
  - Tribes with approved Pub. L. 102-477 Plans will submit child counts (Appendix 1-A) through CARS
- 1.7 New Question, Types of CCDF Providers
- 1.10 Disaster Preparedness and Response Plan questions were moved from Section 2 to Section 1

# Section 1 – New Question

## 1.7 Types of CCDF Providers

Select the types of providers that offer services directly to families and children in the Tribal CCDF Program. Check only those that apply:

- Tribally-operated center(s)
- Tribally licensed center-based providers
- Tribally licensed family child care providers
- State licensed center-based providers
- State licensed family child care providers
- License-exempt center-based providers
- License-exempt family child care providers
- Relative care
- In-home providers
- This Tribal Lead Agency does not offer direct services to families through the Tribal CCDF Program

## 2. Establish Standards and Monitoring Processes to Ensure the Health and Safety of Child Care Setting

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2.1 Health and Safety Standards and Training Requirements for CCDF Providers

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2.2 Monitoring and Enforcement Policies and Practices for CCDF Providers

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2.3 Exemptions for Relative Providers

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2.4 Comprehensive Background Checks



## Section 2 – Key Changes



- Health and safety standards and training requirements combined by topic
- Monitoring and enforcement of health and safety requirements described by provider type
- Exemptions for relatives combined into one question (except for Background Checks)

## 2.4 Comprehensive Background Checks

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2.4.1 Methods used for each of the eight comprehensive background check requirements

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2.4.2 Disqualifying crimes for employment eligibility

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2.4.3 Fees

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2.4.4 Timeliness and privacy in returning the results

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2.4.5 Provisional employment

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2.4.6 Appeals for child care staff

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2.4.6 Justification for alternative approach(es)

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## 2.4 Comprehensive Background Checks – Key Changes



- Much more substantial revisions than other sections
- Incorporated more checkboxes to facilitate Tribal Lead Agencies in describing their procedures
- Limited repetitive questions
- Flexibilities for alternative approaches sprinkled throughout with justification and a description of how the alternative approach is comprehensive and ensures the health and safety of children at the end

## 3. Supporting Continuous Quality Improvement

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### 3.1 Quality Improvement Goals and Activities

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### 3.2 Supporting Training and Professional Development of the Child Care Workforce with CCDF Quality Funds

## Section 3 – Key Changes



- Table in 3.1 changed to reflect current infant/toddler and quality set-asides
- Stabilization subgrants added to 3.1.2d
- Personal Protective Equipment added to 3.1.2f

## 4. Tribes with Small Allocations Only – Direct Services

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The Final Rule exempts Tribes receiving small allocations from the majority of the CCDF requirements:

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Allow more flexibility in how Tribes spend their CCDF funds

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Focus these funds on health and safety

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Quality spending

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Tribes with small allocation have the option to offer direct services, including determining their own eligibility requirements



## Section 4 – Key Changes



- More clear instructions on flexibility
- Optional sections to describe eligibility criteria
- Clarified when sliding fee scale is needed





# Part II

## Sections 5, 6, and 7 For Tribes with Medium and Large Allocations Only

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# 5. Provide Stable Child Care Financial Assistance to Families

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## 5.1 Eligible Children and Families

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## 5.2 Application and Eligibility Determination /Redetermination Process

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## 5.3 Improving Access for Vulnerable Children and Families

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## 5.4 Family Contribution to Payments

# Section 5 – Key Changes



- Clarified that Tribal Lead Agencies that use categorical eligibility must still ensure that
  - children meet the Tribe’s Indian child and service area definitions in order to be eligible for services
  - the provision of services goes to those with the highest need.
- Added a hybrid option for Tribal Lead Agencies that choose to use standard eligibility and categorical eligibility in different parts of their service area or for consortia that have different eligibility tracks among their participating Tribes
- Asked that Tribal Lead Agencies include a definition of “attending” within definitions of “job training” and “education”

# 6. Ensure Equal Access to High Quality Child Care for Low-Income Families

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## 6.1 Description of Direct Child Care Services

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## 6.2 Assessing Child Care Market Rates

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## 6.3 Establishing Adequate Payment Rates

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## 6.4 Implement Generally Accepted Payment Practices and Ensure Timeliness

# Section 6 – Key Changes



- 6.1.1 d – revised chart to better document grants and contracts for child care slots
- 6.3.5 – clarified tiered, differentiated, and add on rates.
- 6.4.3 - removed checkboxes and changed to a or b indicating a choice must be selected.

# 7. Promote Family Engagement through Outreach and Consumer Education

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## 7.1 Parental Complaint Process

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## 7.2 Consumer Education for Parents, Providers, and the Public

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## 7.3 Monitoring and Enforcement Policies and Practices for CCDF Providers

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## 7.4 Additional Consumer and Provider Education

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## 7.5 Procedures for Providing Information on Developmental Screening

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## 7.6 Consumer Statement for Parents Receiving CCDF Program Funds

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# Section 7 – Key Changes



- Acknowledged responses may differ based on provider type and who conducts monitoring
- Added check box options for how information is provided, partners in providing information, and what is included on consumer statement
- Eliminated questions about additional providers on Tribal Lead Agency list

# Overview of the Public Comment Process

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# PRA Approval Process – Federal Register Notice Comment Periods

**10/15/2021**

- First Federal Register Notice Published
- 60-Day Public Comment Period

**12/14/2021**

- Close of 60-Day Public Comment Period

**12/30/2021  
(Target)**

- Second Federal Register Notice
- 30-Day Comment Period



# How to Provide Comments

- Comments can be forwarded by writing to:  
Administration for Child and Families  
Office of Planning, Research and Evaluation  
330 C Street SW, Washington, DC 20202  
Attn: ACF Reports Clearance Officer
- Or by E-mail:
  - [infocollection@acf.hhs.gov](mailto:infocollection@acf.hhs.gov)

# Poll Question

- Have you reviewed the Preprint and provided public comment?
  - Yes
  - No
  - No, but planning to prior to the deadline



Tribal CCDF  
Plan  
Submission  
Deadline

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Wednesday,  
July 1, 2022

# Thank you!

