

Summary of Public Input

Draft 2025-2027 CCDF State Plan

The Child Care Development Fund (CCDF) is a federal and state partnership program that guides and provides funding for Vermont’s child care system. The Child Development Division (CDD) is the lead agency that receives CCDF funding for the State of Vermont. Every three years, CDD must complete a state plan that shows how the division uses funds in alignment with federal requirements.

From May 28 - June 13, 2024, CDD opened a window for public input on the 2025-2027 CCDF State Plan. This document summarizes public input and provides a response from CDD.

Several comments did not propose policy changes and are not reflected in this document. However, the comments did lead to changes in the draft State Plan, including technical corrections, rewording of sentences or paragraphs for flow and accuracy, expansions of concepts in the existing draft, and references to reports or studies to help bolster an existing response. In many cases, CDD represented proposed changes in the final draft of the State Plan. Thank you to everyone who took the time to share their input.

Section 1: CCDF Program Administration

1. Four comments were received requesting that CDD continue to fund the Snelling Center’s Early Childhood Leadership Institute.
 - **CDD Response and Rationale:** CDD appreciates this feedback. Decisions regarding funding of specific professional development are made on a year-by-year basis and reflect CCDF State Plan quality priority areas. CDD will not add language about funding the Snelling Center to the State Plan at this time, but intends to financially support the program in 2025. CDD will continue to review funding the program annually going forward.

Section 2: Child and Family Eligibility and Enrollment and Continuity of Care

1. One comment noted that in section 2.1.1b, that CDD referenced an online CCFAP application. The commenter requested that if an online application wasn’t going to be available by 7/1/24, that CDD instead describe how the state plans to move to an online application.

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- **CDD Response and Rationale:** The online application is expected to be available in September 2024. Since this plan is effective 10/1/2024, CDD is responding affirmatively to the question of whether the Lead Agency uses an online application.
2. One comment requested that in sections 2.2.1b.i and 2.2.1c that the upper age limit should be listed as 18, and not 19.
 - **CDD Response and Rationale:** CCDF language defines the age limit as “children up to age 19”, meaning until the child reaches their 19th birthday.
 3. One comment requested that CDD include information about the new non-citizen category of CCFAP recipients that was created by Act 76 under section 2.2.2f
 - **CDD Response and Rationale:** The changes for children who do not have US citizenship or a federally qualified immigration status are funded by state dollars. They are not included in Vermont’s protective services definition because federal funds cannot be used for the children who do not meet CCDF eligibility requirements, including having US citizenship or a federally qualified immigration status.
 4. One comment requested that CDD include the current and October 2024 eligibility tables within section 2.2.4 as a part of sharing how Act 76 will impact CCDF Program administration.
 - **CDD Response and Rationale:** The October eligibility changes will take effect on 10/06/24 which is after the plan is effective on 10/01/24. An amendment will be submitted to the State Plan at that time.
 5. One comment requested that CDD change “his/her” to “their” language in section 2.2.4c(x) to better represent recipients with non-binary gender identifies.
 - **CDD Response and Rationale:** Thank you for this feedback. The language was changed to “their”.
 6. One comment requested a system that would provide child care programs with a notification, well in advance, of a family’s redetermination.
 - **CDD Response and Rationale:** Effective June 2023, child care providers receive notification 45 days in advance of a family’s redetermination.
 7. One comment requested that master’s degrees be included in the definition of “attending an educational program”.
 - **CDD Response and Rationale:** Thank you for this feedback. CDD is reviewing service need activities later in summer 2024 and will consider making this change. Should the change be adopted, an amendment to the state plan will be submitted.
 8. One comment does not agree with the timeframe for child support payments described by the plan, stating: “I believe if the absent parent pays within 3

months, they include the amount. But that means they could make payments 1/4 of the year and it still gets counted against the parent needing support.”

- **CDD Response and Rationale:** Thank you for your feedback. CDD will consider your input during our 2024 review of CCFAP eligibility policies.

Section 3: Child Care Affordability

1. One comment expressed concerns that CDD calculated the maximum family contribution incorrectly at 12.4%, with the organization commenting having calculated the maximum family contribution as representing 12.59% of gross family income.
 - **CDD Response and Rationale:** This section has been updated to reflect that CDD’s calculation was made against the maximum CCDF funding of 85% State Median Income, and not to the state maximum funding.
2. One comment requested more information on how CDD will address the new CCDF rule requiring states to not charge families with incomes up to 85% SMI more than 7% of their gross household income.
 - **CDD Response and Rationale:** CDD is in the process of implementing CCFAP changes associated with Act 76 and does not have more information to share at this time. CDD will share more information publicly as our plans become finalized.
3. One comment requested a change to the language in section 3.3.1(vii) indicating that families with a gross household income below 170% of the federal poverty level (FPL) have waived family copayments. The commenter noted that under Act 76, this language should state that families with incomes below 176% FPL have waived copayments.
 - **CDD Response:** CDD updated the State Plan to reflect this comment.

Section 4: Parental Choice, Equal Access, Payment Rates, and Payment Practices

1. One comment stated that within section 4.1.1c: “Both yes and no are selected for this question regarding whether the Lead Agency offers child care assistance through grants or contracts. To the best of our knowledge, CDD does not yet use this approach.”
 - **CDD Response and Rationale:** Thank you for this feedback. The correct answer to this question is currently “no”. That change is now reflected in the State Plan.
2. One comment requested that CDD note that Act 76 prohibits programs from charging families participating in CCFAP for enrollment or waitlist fees.
 - **CDD Response and Rationale:** CCDF does not address enrollment or waitlist fees. Mandatory registration fees are addressed in 4.4.2b.

Section 5: Health and Safety of Child Care Settings

1. One comment requested that CDD not require personnel in a public school setting to complete two sets of fingerprint checks, as described in 5.1.
 - **CDD Response and Rationale:** CDD appreciates this feedback and acknowledges that completing multiple sets of fingerprint checks creates a burden for public school personnel. Federal regulations require fingerprint-supported background clearances for each child care provider, which includes public school UPK teachers and staff. Federal regulations also prohibit the use of fingerprints for more than one purpose and sharing results between agencies. Vermont is not alone among states in experiencing challenges related to supporting these requirements. That said, CDD continues to look for ways to make this process easier for personnel and to work with our federal partners to determine how to best reconcile state and federal fingerprinting requirements.
2. One comment stated that the ratio and group size limits described in section 5.2 did not reflect the needs of children needing additional care and requested that age groups be lowered.
 - **CDD Response and Rationale:** CDD appreciates this feedback and agrees that there are children in Vermont needing out of home care who have specialized needs. Minimum ratio and group size standards are described in Vermont regulations and cannot be changed within the CCDF State Plan. CDD anticipates reviewing ratio and group size standards during Vermont's upcoming child care licensing regulations revision process. This request will be reviewed at that time with the goal supporting child safety and the individualized learning and relationship needs of each age group.
3. One comment requested that the state help providers pay for water testing and expenses associated with meeting asbestos and lead testing requirements, as described in section 5.3.
 - **CDD Response and Rationale:** CDD appreciates this feedback. While CDD cannot commit additional funds to cover the cost of this testing for all providers, the division will ensure that providers have access to any and all grant information that could help to subsidize these costs.
4. Two comments voiced concerns associated with long fingerprint processing timelines, within the process described in section 5.7.
 - **CDD Response and Rationale:** CDD recognizes that the delays experienced between when a staff person gets fingerprinted, to when their fingerprints are processed, to when their results are then provided to CDD, can be burdensome. CDD soon will receive technical assistance from our federal partners to evaluate the current process in

Vermont. CDD will work with our partners within Vermont and out-of-state to explore ways to shorten these processing timelines.

5. One comment requested that CDD include recommendations for systems improvement that were described in a 2023 Vermont Crime Information Center (VCIC) legislative report on fingerprinting dated 1/11/2024.
 - **CDD Response and Rationale:** CDD appreciates this feedback and is actively pursuing federal technical assistance that will help Vermont assess the viability of the options outlined in the VCIC legislative report.

Section 6: Support for a Skilled, Qualified, and Compensated Child Care Workforce

There were no policy recommendations submitted for this section, although there were numerous technical corrections and suggested expansions to existing responses. CDD considered all of these suggestions, and many of them are reflected in the revised version of the State Plan.

Section 7: Quality Activities

There were no policy recommendations submitted for this section, although there were numerous technical corrections and suggested expansions to existing responses. CDD considered all of these suggestions, and many of them are reflected in the revised version of the State Plan.

Section 8: Lead Agency Coordination and Partnerships to Support Service Delivery

There were no policy recommendations submitted for this section, although there were numerous technical corrections and suggested expansions to existing responses. CDD considered all of these suggestions, and many of them are reflected in the revised version of the State Plan.

Section 9: Family Outreach and Consumer Education

1. One comment requested better information online for families about Act 166 and UPK.
 - **CDD Response:** Thank you for this input. Additional information about Act 166 is available on the [Agency of Education website](#). If you would like to

expand on your request and share more information about the kinds of resources that you need, please contact CDD at AHS.DCFCDDInfo@vermont.gov.

Section 10: Program Integrity and Accountability

There were no policy recommendations submitted for this section.