

June 7, 2021

Nevada Division of Welfare and Supportive Services  
Submitted via email: kefilippi@dwss.nv.gov  
*\*In lieu of verbal comments*

Re: Nevada's Draft CCDF Plan for 2022-2024

KinderCare Education proudly serves more than 1,000 children at our 10 high quality early learning centers across Nevada. Our world class educators stepped up during the COVID-19 pandemic to provide high quality care to essential workers and we are hopeful for the continuing rise in enrollment as more parents are able to return to work. We are committed to serving all children regardless of background and financial circumstance, and we are proud of the diverse group of children we serve. Approximately 22% of our children in Nevada are from hardworking families who receive assistance under the Child Care and Development Block Grant (CCDBG). We appreciate the opportunity to provide written comments on the state's draft CCDF Plan for 2022-2024.

CCDF 2022-2024 Draft Plan and Implementation Comments:

- 1.2.5 KinderCare Education recommends the Nevada Division of Welfare and Supportive Services (DWSS) define the acronym "CCDP" and describe its role in the implementation of the state's CCDF Plan for 2022-2024. Additionally, in sections 1.3.1 forward, the Lead Agency refers to the Child Care Development Program (CCDP) as a person or entity; we recommend DWSS add the word, "staff," after the acronym (CCDP) in the Plan.
- 1.3.2 We recommend DWSS clarify in the description there was no publicized opportunity to provide written comments in response to the draft Plan. As the state only held one public hearing, it is disappointing the Lead Agency did not make more of an effort to solicit written comments.
- 2.3.7 KinderCare Education recommends DWSS include a statement to work with the Department of Health and Human Services over the Plan implementation period to simplify the online posting of monitoring reports. The current search function requires parents to copy and paste (or remember) the exact title of the program - or navigate computer coding to enter a "%" sign. This may create barriers for parents to access critical health and safety information and make an educated consumer choice for their child.

3.2.5 KinderCare Education requests verification of the certification that the Lead Agency sets its initial eligibility level at 85% of State Median Income (SMI). The chart in Section 3.1.3 indicates the maximum entry level income is approximately 50% of SMI. We recommend DWSS amend one - or both - description(s) to more accurately reflect barriers for parents to participate in the childcare subsidy program based on income. If the state offers more than one type of childcare assistance with differing income limits, we urge DWSS to be transparent with program eligibility.

3.1.5 KinderCare Education recommends DWSS include a description to partner with the Governor and Legislature over the Plan period to eliminate and/or prevent any wait list. As the state is poised to receive a significant amount of new federal funding, we urge DWSS to advocate for permanent funding in order to ensure all eligible parents can receive the intended support.

3.2.1 We recommend DWSS add a sentence describing an interest in reviewing the current copayment structure to ensure no family pays a greater share of their income on childcare than reflects the national average. The current copayment for families transitioning off the Child Care Assistance rises to 42% of income for some families. Our experience indicates parents are regularly discontinuing care due to a pay increase that does not make up for the higher copayment.

4.1.8 KinderCare Education recommends DWSS reconsider the responses for whether the state offers tiered reimbursement for providers who serve children in underserved areas, infants and toddlers, children with disabilities, and children who receive care during non-traditional hours. The quality tiered reimbursement is the same amount regardless of the population served. This does not meet the intent of CCDBG to target state efforts and funds toward specific populations of families and children who are vulnerable, at risk, and underserved. A supportive tiered reimbursement structure would take into account the population served in addition to quality of care.

Additionally, we suggest DWSS include a statement expressing an interest to explore implementing additional tiered rates over the Plan period. It is especially important to target resources to providers serving infants and toddlers to support increased costs in lower child to adult ratios, staff qualifications, and specialized equipment.

4.2.1 We recommend DWSS request a waiver for completing a market rate survey or ACF pre-approved alternative methodology and re-evaluate the responses for Section 4.2.2 and 4.2.3 to identify the state is not in compliance with this CCDBG requirement.

4.2.6 KinderCare Education urges DWSS to provide more consistent and transparent responses for the state's most recent market rate survey.

4.3.1 We recommend DWSS review the base payment rates entered in the table to verify they reflect the base rates (i.e., without any quality bonus). DWSS stated these dollar



amounts became effective in 2016 and yet certified they are set at the 75th percentile of the most recent market rate survey (2018). We expect DWSS to update this section to more accurately reflect the current base reimbursement dollar amounts and the corresponding percentile from the most recent market rate survey as directed. If there has not been an updated market rate survey, we expect DWSS to complete 4.2.1 requesting a waiver.

The benchmark for equal access established by the U.S. Department of Health and Human Services (HHS) is the 75th percentile of the current childcare market. Nevada's outdated base reimbursement rates are far from meeting the costs of simply providing a safe and healthy environment. Programs operating at all levels of quality need a stable payment rate that not only covers current costs, but also affords them the opportunity to increase quality.

5.5.3 KinderCare Education urges DWSS to provide more consistent and readable responses for the state's procedures for compliance with background check requirements, including section 5.5.4 regarding the state's participation in the national fingerprint file (NFF) program. We recommend DWSS include an interest in working with the State to strengthen processes for interstate background checks over the Plan period; one of the biggest advantages of becoming an NFF state is the reduction of duplicative record maintenance. An FBI fingerprint check satisfies the requirement to perform an interstate check of another state's criminal history record repository if the responding state participates in the NFF program.

KinderCare Education is proud to provide high-quality childcare in Nevada. If we can be of further support in the implementation of the state's CCDF Plan for 2022-2024, please do not hesitate to contact us.

Thank you,

KinderCare Education, LLC  
September Jones, Government Relations Manager  
Sejones@kindercare.com

