

North Dakota's 2025-27 CCDF State Plan  
Public Comments and Lead Agency Responses

**Comment:** What about raising the amount that is covered for ages 3-5?

**Response:** Payments rates are set by the Child Care Assistance Program from results of the Market Rate Survey. The survey results from the 2023 Market Rate Survey have not been published yet, however you can see the plan for adjusted rates in Section 4 of the draft State Plan.

**Comment:** "I was really happy to see the State implement and focus more money on infant and toddler care because I felt like raising those rates definitely provided so many more opportunities for low-income families to find quality and actual daycare for those infant and toddler age groups. But I think at this time there is such a huge pay gap between those, and I don't feel like \$811 for three to five is really an accurate price point anymore. I think that most of us are charging more than that and then that's causing families to have to pay out of their pocket and you know they don't want to do that, can't afford to do that, etc."

**Response:** Payments rates are set by the Child Care Assistance Program from results of the Market Rate Survey. The survey results from the 2023 Market Rate Survey have not been published yet, however you can see the plan for adjusted rates in Section 4 of the draft State Plan.

**Comment:** Did the market rate survey include wage rates for employees or was it specific to only the rate of childcare?

**Response:** The Market Rate Survey included the Narrow Cost Analysis which included questions on wage rates for employees. The Market Rate Survey and Narrow Cost Analysis have not been published yet, but will be posted at <https://www.hhs.nd.gov/applyforhelp/ccap>.

**Comment:** I do think that the State paying based on enrollment is something that has helped families tremendously. Well, it's helped families and helped providers because it's given me a little more peace of mind knowing that I am going to get paid from them no matter if they decided to "dip out" or something happens, etc.

**Response:** Thank you for your comment; the Lead Agency will continue to pay based on enrollment.

**Comment:** Another thing I want to add, it could have been on a different slide, but an issue that I run into with families on daycare assistance is sometimes I get a notice the last day of the month, so like May 30<sup>th</sup> or May 31<sup>st</sup>, I would get a notice saying that a family is no longer eligible for childcare assistance as of June 1<sup>st</sup> but I had no idea that it was coming. And oftentimes the parents claim that they had no idea it was coming either. And then we run into this issue where, "oh I've reapplied but it's not being processed" or it takes us six weeks to figure out that they don't even qualify anymore.

**Response:** In section 4.4.2 (d) of the State Plan the Lead Agency addresses how notices are sent out to providers regarding changes in a family's eligibility. Child Care providers are sent a 'Closing Notice for Provider'. This notice is sent to all providers associated to a case when the case is set to close. The notice informs the provider that any services provided after a certain date, typically the first day of the month after a case closed, will not be paid by the Child Care

Assistance Program. Child Care providers are also notified of changes to payment rates and co-payments through an updated certificate as changes are made.

**Comment:** So when it comes to the ongoing health and safety training something that has been brought up to me recently is that the basic childcare course that is required for every staff when they start actually has a lot of the information that's included in safe sleep and also mandated reporting is basically right in that training again. So, if you end up taking all three of the trainings like you're supposed to when someone starts, it's a lot of repeated information. Maybe consider combining it? I don't know if any of you have actually walked through any of those three trainings.

**Response:** Getting Started meets the Child Care and Development Fund's federally required health and safety topics which include safe sleep and mandated reporting. All providers regardless of ages served must complete Getting Started. Previous State legislation has mandated annual Safe Seep training for those caring for infants and Mandated Reporter training for all providers. The Lead Agency plans to update mandated training and will take this comment into consideration at that time.

**Comment:** I think it's on here talking about background checks. It's kind of hit or miss on the turn around time on getting background checks done. I would say 35% of the time I lose a staff member, like a new hire, because they are unwilling to wait for their background check to come in. Or let's say that they were waiting, but in the meantime of them waiting, they were able to find a new job. I understand the reasoning behind it, but I just wonder if there is a maybe a faster way to get the preliminary clearance coming through.

**Response:** Section 5.7.13 of the State Plan addresses the timeframe to complete criminal background checks. The Lead Agency must carry out a request from a child care provider for a criminal background check as expeditiously as possible, and no more than 45 days after the date on which the provider submitted the request. On average, preliminary results are sent within 4 calendar days from the date the full kit is received.

**Comment:** Will the coordination in 8.1 encourage more collaboration with entities at the local or county level to address needs?

**Response:** Section 8 addresses the coordination and partnerships which help ensure that the Lead Agency's efforts accomplish the Child Care and Development Fund's goals effectively, leverage other resources, and avoid duplication of effort. Such coordination and partnerships can help families better access child care, can assist in providing consumer education to parents, and can be used to improve child care quality and the stability of child care providers. This section identifies who the Lead Agency collaborates with to implement services.

**Comment:** Will the State expand and/or begin gathering data on the ASQ 3 or SE results collected through USpire?

**Response:** USpireND provides the Lead Agency with data on the number of ASQ 3 and ASQ SE screens completed. The Lead Agency will explore data elements that may be available at an aggregate level.

**Comment:** As a veteran school-age provider, I was disappointed to see school-age licensed programs once again being overlooked in the CCDF State Plan. The renewed 2025-2027 plan presents an excellent opportunity for North Dakota to

develop and implement a QRIS specifically for school-age providers, create targeted training programs for these providers, and establish a career pathway for staff working exclusively in school-age licensed programs. According to the North Dakota 2024 Child Care Profile, 70,814 of the 123,923 children (57%) in the state are ages 6-12. This significant age group, along with the staff who care for them, deserve the same opportunities as those in birth-to-5 programs.

**Response:** The Lead Agency is planning to revise and expand the statewide quality rating and improvement system (QRIS) to better serve all types of early childhood providers in North Dakota. During this planning cycle, the Lead Agency will conduct a quality needs assessment to gather data and solicit stakeholder input. The results of the needs assessment will be used to draft new criteria, guidance, and policies for the revision, as some changes may require legislative action.

The ND Early Childhood Workforce has 6,258 members with verified employment positions; 409 (6.5%) have verified school age employment. The Lead Agency has identified training sponsors that have recently made a number of trainings available on the statewide training calendar for school age providers. The Lead Agency is working with the vendor to see if there is a way to add a search feature to more readily identify training by ages addressed.

**Comment:** Section 7.2.1 Quality Improvement Activities - From April 2023 – April 2024, an average of 17 to 26% of child care subsidies each month in ND supported school-age children between 5 and 12 years old. With a quarter of child care subsidies supporting this age group and quality activities of the CCDF plan, including all programs in addition to those receiving subsidies, we recommend investment of quality funds toward school-age specific quality systems (Section 7.2.1). ND's statewide Quality Rating and Improvement System (QRIS) supports quality activities for providers working with children ages 0 – 5. School-age children served through subsidies and within the licensed child care system would benefit from access to training and support provided by the QRIS system to continually improve their environments and the skills of their staff through best practices for their age appropriate development. Given that a specific School-Aged License is available to providers, we feel that providing an opportunity for school-age programs to engage in the QRIS is a next step for programs who serve children ages 5-12 years old.

With COVID relief funds ending in September 2024 and proposed changes to eligibility of ND's 21st Century Community Learning Center funds, we anticipate an increase in the number of currently exempt programs exploring school-age licensing. To assist in meeting this need, the Network developed an Afterschool Program Start-Up Toolkit along with additional supports through the ND Quality Standards for Out-of-School Time Programs. The Network recommends ongoing mechanisms to ensure that outreach and technical assistance is available to assist school-age specific programs.

Suggested language 7.2.1 (iii): This process will also include designing components of the quality system specific to school-age providers. This may include a school-age pathway or alternative pathway in the current QRIS or coordination with current school-age quality systems to ensure quality programming and supports and incentives are available for providers serving children birth through age 12.

**Response:** The Lead Agency is planning to revise and expand the statewide quality rating and improvement system (QRIS) to better serve all types of early childhood providers in North Dakota. During this planning cycle, the Lead Agency will conduct a quality needs assessment to gather data and solicit stakeholder input. The results of the needs assessment will be used to draft new criteria, guidance, and policies for the revision, as some changes may require legislative action.

**Comment:** Professional Development Framework - High-quality staff are the foundation for high-quality programming. Opportunities for staff of school-age programming to participate in relevant professional development, pursue credentials and degrees, and advance in career pathways are important. ND Early Childhood Career Pathways apply to professionals who work with or on behalf of children from birth to eight years of age. This provides a challenge for staff

working with school age children beyond age 8 within licensed programs to obtain credentialing relevant to advance in their profession of working with school-age children.

Suggested language 6.2.2 (a.i, a.ii), 6.2.3 (a, b): To support training and professional development of school-age providers and ensure best practices for the ages of children and youth being served, the state will invest and partner with school-age specific training, quality specialists, and networks, ensuring school-age providers have relevant and timely quality supports. Career pathways will be expanded or strengthened to include providers working with children ages birth through 12.

**Response:** The Lead Agency has identified training sponsors that have recently made a number of trainings available on the statewide training calendar for school age providers. The Lead Agency is working with the vendor to see if there is a way to add a search feature to more readily identify training by ages addressed. Although the North Dakota Early Childhood career pathways are built to recognize the preparation of providers working with children from birth to age 8, the Lead Agency recognizes that licensed programs may serve children through the age of eleven years in out of school times.