

2019-2021 State Plan Public Comments

Total Public Comments

10

Representation

- Child Care Provider
- Child Care Resource and Referral agency
- Parent
- Tribal Child Care Provider

Communities Addressed in Public Comments

- Helena
- Missoula
- Bozeman
- Northern Cheyenne

Response to Public Comments

General Comments

Comment: "Daycare" is used throughout the Plan.

Response: Montana has updated the Plan to say, "child care" instead of "day care" where appropriate. If statute or policy is being cited, "day care" may still be used instead of child care as that is the current language.

Result: Updated Plan language

Comment: Thank you for the work of the Early Childhood Services Bureau and partners.

Response: Thank you for your comment

Result: No change to Plan language

Comment: The Northern Cheyenne Child Care Development and Fund Program has been inquiring on some of the trainings that have no expired dates or hours, how often does the State Child Care update/refresh such trainings? We're thinking the ones we have questions on by putting a time frame to those which have no limit. Maybe from 1 year to 2 years pending on the training. Interested on the state feedback.

Response: All approved trainings for MT are required to be reviewed and renewed through the statewide training approval process a minimum of every 3 years. This includes courses approved and offered through www.ChildCareTraining.org.

Result: No change to Plan language

Section 1

1.4.1

Comment: Coordination with WoRC mentioned several times throughout the document but later referred as Pathways.

Response: Montana Pathways refers to the Montana TANF contracted integrated services delivery program for all TANF clients. The Work Readiness Component (WoRC) provides employment and training services to individuals receiving cash assistance.

Result: No change to Plan language

1.5.2

Comment: Typo: \$9,05,689

Response: This value was missing a number

Result: Update to Plan language: \$9,015,689

Section 2

No public comments

Section 3

No public comments

Section 4

4.1.3

Comment: Recommendation to check the 1st box – programs to serve children with disabilities

Response: Thank you for your comment.

Result: Update to Plan response

4.3.1

Comment: Montana received several comments about this response in the Plan. It appeared that commenters were reading this response as the state's rate, not the rate in a particular region. There were concerns that the rates reported were too low for the Bozeman area.

Response: The Plan asks states and territories to "Provide the base payment rates and percentiles (based on the most recent MRS) for the following categories below... Please use the most populous geographic region (area serving highest number of CCDF children)." Montana's response is based on the most populous geographic region, Region 7 (Billings area).

Result: No change to Plan language

4.3.2

Comment: The commenter fully supports the quality differential. The commenter recommends STARS to Quality programs are required to serve families receiving subsidy.

Response: Thank you for your comment.

Result: No change to Plan language

4.4.1

Comment: The plan refers to setting payment rates based on county grouping and based on a standard state rate.

Response: The Plan does not refer to using a standard state rate in Montana's responses.

Result: No change to Plan language

Section 5

5.2.2

Comment: The plan states that all children enrolled in MT licensed facilities must be immunized. It should also say that children who are medically exempt do not have to be immunized.

Response:

Result: Update to Plan response

5.2.4

Comment: How many training hours of the 16 yearly has to be in health & safety?

Response: Montana requires at least 4 of the annual training hours to be in health & safety.

Result: Update to Plan response

5.2.5

Comment: Healthy Safety Tips in Child Care is listed as a course but is not currently offered.

Response: The correct course name is "Health and Safety Overview."

Result: Update to Plan response

Comment: The 60-hour Preschool course lists different components than the currently offered course.

Response: The correct course components have been added.

Result: Update to Plan response

Comment: Child abuse and Neglect: Mandatory Reporting (orientation course) is another class required by licensing of all caregivers that addresses the last item in this section.

Response: Thank you for your comment.

Result: Update to Plan response

5.3.1

Comment: The first paragraph refers to the Safe Sleep and Shaken Baby Syndrome course. This course was combined with Safe Sleep and is now called Infant Safety Essentials. The title should be updated.

Response: Thank you for your comment.

Result: Update to Plan response

5.4.1

Comment: Increasing health and safety standards for child care was the major bipartisan selling point of the CCDBG reauthorization. Delaying implementation of the FBI background checks seems counter to this policy priority. As Congress has just approved a substantial increase in CCDF funding to enable states to fully implement the reauthorization, it seems reasonable to invest some of them in the background checks. Alternatively, MT could restore funding to the Professional Development Incentive Awards and Mini-Grants, which would eliminate the concern about cuts to other provider benefits. It seems reasonable to be able to implement this lawmaker priority by 9/19.

Response: Thank you for your comment. In recognition of the significant challenges to implementing the Child Care and Development Fund (CCDF) background check requirements, all States applied for and received extensions through September 30, 2018. The Office of Child Care (OCC)/Administration for Children and Families (ACF)/U. S. Department of Health and Human Services (HHS) is committed to granting additional waivers of up to 2 years, in one-year increments (i.e., potentially through September 30, 2020) if significant milestones for background check requirements are met. In order to receive these time-limited waivers, states and territories will demonstrate that the milestones are met and apply for the time-limited waiver by responding to questions 5.4.1a through 5.4.1h.

Result: No change to Plan language

Section 6

General comments for section 6:

Comment: Suggestion to increase incentive for infant/toddler care. Suggestion to reimplement other incentives that had previously been offered

Response: Language in the Plan reflects decisions made in accord with MCA 17-7-140 and the results of the legislature's special session.

Result: No change to Plan language

6.1.1

Comment: MT's Distance Learning contractor is represented on this advisory council.

Response: Language has been added to the Advisory structure response.

Result: Update to Plan response

6.1.3

Comment: Inclusion courses are only available for STARS providers.

Response: Inclusion 1 and 2 are offered on a semester basis. Fall semester begins in September and Spring semester begins in January. Inclusion 1 is a pre-requisite for Inclusion 2. They cannot be taken at the same time. This is a STARS course, so a link is required for registration. Because these trainings are required for STARS participation, STARS program staff receive priority registration. Montana is considering ways to offer the course to more students.

Result: No change to Plan language

Comment: MT revenue problems resulted in the loss of funding for Professional Development Incentive Awards for higher ed, Certified Preschool Training, and other PDIA tracks. Infant Toddler PDIA was greatly reduced. It also resulted in the elimination of funding for CDA and Accreditation application fees. The loss of these incentives undermines STAR to Quality Advancement. PDIA is the only incentive specifically for caregivers, not facilities. As there is extensive training required of caregivers for STARS, the loss of PDIA's may significantly undermine staff enthusiasm to participate. Additionally, we believe that certified Infant/Toddler and Preschool classes should be free to all participants at this point. As they are required for STARS R&Rs must deliver the courses twice per year, even to very small groups. Non-STARS providers are unlikely to participate. A larger group is more effective for training and a better investment of highly skilled PDS certified trainer time. R&Rs are unlikely to generate much fee revenue from these courses, thus will not recoup the 1% cut necessitated by Montana's revenue problem.

Response: Thank you for your comment.

Result: No change to Plan language

6.2.4

Comment: This section refers to an increased demand for scholarship information and applications in other language. In section 2.1.1 it states that translation services are available through the Lead Agency. It would be great if the Lead Agency would make the scholarship application available electronically in commonly requested languages, particularly Spanish. This could be available electronically as a PDF. It's a waste of resources to have regional R&Rs have this form repeatedly translated.

Response: Thank you for your comment. Montana will consider ways to develop and implement this suggestion.

Result: No change to Plan language

Section 7

General comments for section 7:

Comment: Would like to see increased funding for special needs subsidy, including expansion of funds to use with families not on the scholarship.

Response: Thank you for your comment.

Result: No change to Plan language

Comment: Recommendations: Reinstate full infant toddler stipend. Make the infant toddler course free for all programs, not just STARS. Start a pilot program like STARS preschool – slot rates for new and existing STARS programs, and other programs serving infants and toddlers.

Response: Thank you for your comment.

Result: No change to Plan language

7.1.1

Comment: Would like to see additional supports for infant/toddler care, including additional funding and increased slots.

Response: Thank you for your comment.

Result: No change to Plan language

Comment: Would like a copy of the compensation turnover report from the infant toddler work group

Response: This report is still in draft form. Once the report is finalized, the report will be available on the ECSB website.

Result: No change to Plan language

7.2.1

Comment: Address additional funding in CCDF

Response: Thank you for your comment.

Result: No change to Plan language

Section 8

8.1.5

Comment: MT's response does not seem to answer the question – the answer given is about process, not results. It seems like it should say something like in FFY17 MT discovered # incidents of fraud or IPV for a total of \$. Efforts to collect are underway. If, however, the answer written is the response needed here, it is missing the fact that a provider may be found to have an intentional program violation. In our region, we see far more provider IPV's than parent IPV's.

Response: This section includes topics on internal controls to ensure integrity and accountability and processes in place to investigate and recover fraudulent payments and to impose sanctions on clients or providers in response to fraud. 8.1.6 pertains to actions taken by the lead agency.

Result: No change to Plan language