

# ■ BRIEF

## Re-Envisioning CCDF

### Toward an Anti-Racist Child Care System That Serves Families & Educators

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In the United States, child care is increasingly recognized as a necessary public good, an essential element of our social infrastructure that supports children’s development, families’ financial stability, and our economy’s growth. Child care is the backbone of the economy, but federal funding for child care—through The Child Care and Development Fund (CCDF)<sup>1</sup>—reaches only a fraction of eligible families and is subjected to the volatility of the annual federal appropriations process. Policymakers who are seeking to create a child care system that is further-reaching, more stable, and more equitable must address the deeply entrenched legacies of racism and sexism that influence our nation’s underinvestment in child care, specifically CCDF. This brief offers a guide for envisioning an anti-racist universal child care system that is valued as a public good, highlighting changes that can be made within and beyond the current CCDF program and funding structure.

Access to a diverse array of child care and school-age care options can allow families to achieve financial stability and support the healthy development of children. Those who could benefit the most from increased investments in the child care system—including families of color, families with low incomes, and families led by single parents—have unequal access to affordable child care options that meet families’ diverse needs and school-age care opportunities.<sup>2,3</sup> Lack of access to child care makes it difficult to obtain stable employment, stable housing, and other basic needs—and a lack of stable employment and housing makes it difficult to access child care—all of which have long-term impacts on family economic well-being, children’s development, and intergenerational economic mobility.<sup>4</sup>

Insufficient public investment in child care infrastructure and inequitable funding schemes have created and exacerbated barriers to high-quality child care, particularly for families of color.<sup>5</sup> These barriers are rooted in structural racism, which manifests in various ways in society and is reinforced through inequitable and discriminatory systems, beliefs, values, and distribution of resources.<sup>6</sup> A long history of sexism has also contributed to early educators, disproportionately women of color and immigrant women, remaining some of the most underpaid workers in the country.<sup>7</sup>

This brief offers a new vision for the child care subsidy system in the United States, employing an anti-racist framework to analyze CCDF and propose recommendations for advancing a more equitable child care system through and outside of the CCDF program and funding. The approach is rooted in the following understanding of the current system:

- Chronic underinvestment drives many of the broken dynamics in the child care sector. The federal government has a responsibility to adequately and equitably fund the child care system as a public good that works for families and educators. Such a transformation requires a reckoning with the longstanding racism and gender injustice in child care policy as well as the sustained and robust public investment needed to address the injustice.
- The current CCDF program subsidizes the cost of care for almost 2 million children under age 13 who currently receive care in a variety of settings, including center-based care, family child care homes, family, friend, and neighbor care, and through summer and afterschool care.<sup>8</sup> Many child care educators also benefit from CCDF funding directed at increasing compensation and expanding professional development opportunities.<sup>9</sup> However, CCDF is severely limited in funding and does not go far enough in its policy design to mitigate long-standing racial inequities in our society.

- Flexibility within the current structure of CCDF would allow for changes that could make progress toward a more equitable system. However, restructuring the child care subsidy program and its funding as an anti-racist, universal program would mean replacing CCDF's racism-rooted policies with equity-centered alternatives, expanding program eligibility and coverage, eliminating child care shortages, reducing child care costs for families, raising educators' pay, and refining what "quality child care" means for families and educators.
- A robust, fully funded child care system would transform our economy, reduce poverty, advance gender and racial equity, and enable children, families, and educators to thrive.

This brief also provides a brief history of CCDF, proposes new goals for CCDF, and provides six policy recommendations for transforming the CCDF program to advance racial, gender, and economic justice in a more equitable child care system.

## Background & History

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A child care system that advances racial and gender equity requires policymakers and the public to recognize the racist components of even well-intentioned social policies and programs, such as the Child Care and Development Fund (CCDF). The CCDF program structure and perpetual underinvestment are rooted in historical structural disparities related to intertwined issues of race, class, and gender.

Historically, in the United States, enslaved Black women were forced to care for white children, sometimes having to leave their own children with others for care, if not forcefully separated from them entirely.<sup>10</sup> Following the end of chattel slavery, government policies and employer discrimination blocked Black women from occupational opportunities other than domestic roles, keeping them in service to white families.<sup>11</sup>

The first time the United States saw large-scale federal investments in child care was during World War II when the Lanham Act of 1940 expanded and created child care facilities for mothers working in war-related jobs.<sup>12</sup> However, this effort faced pushback in the form of prevailing negative opinions of maternal employment, and Congress cut off Lanham Act funding for child care centers shortly after the war's end.<sup>13</sup> Other federal programs providing child care subsidies through what would become Aid to Families with Dependent Children (AFDC), and later through the Child Care Development Block Grant (CCDBG), evolved over subsequent years, but would still fall short of need.<sup>14</sup>

Overall, historical structural discrimination, rooted in the gendered devaluation of child care and domestic work, has long reinforced harmful and exclusionary narratives of child care as a private family matter and unpaid labor done out of love and necessity.<sup>15</sup> Subsequent policy choices have blocked parents—particularly women—from remaining in the workforce and achieving economic security.

After several frustrating decades of inaction, a coalition of early childhood advocates, civil rights leaders, feminists, and labor leaders came together to push Congress toward a universal child care bill. The Comprehensive Child Development Act of 1971 would have provided funding for cities to set up child care centers available to all families on a sliding fee scale,<sup>16</sup> offering free child care for those with the lowest incomes, providing nutrition and medical services, and focusing on the development of children growing up in poverty.<sup>17</sup> The premise of the Act was that child care was a right for children, regardless of their family's income, and that this model could help combat racism and promote integration at an early age. Despite bipartisan support in Congress, the bill was vetoed by President Nixon, citing the need to preserve the traditional "family-centered approach"<sup>18</sup>—a veiled attempt to block societal shifts, including racial integration efforts in schools and more white women entering the labor force.<sup>19, 20</sup>

More than two decades later, the 1996 Personal Responsibility and Work Opportunity Reconciliation Act (PRWORA),<sup>21, 22</sup> which supplanted AFDC,<sup>23</sup> consolidated federal child care assistance programs and

funding into the CCDF block grant.<sup>24</sup> PRWORA introduced many immigrant eligibility restrictions to federal programs, including child care subsidies.<sup>25</sup>

PRWORA also provided additional funding for child care.<sup>26</sup> CCDF provides both direct assistance to families with low incomes and funding to states to support child care providers.<sup>27</sup> CCDF is formulaically administered to states as block grants, with significant flexibility for states to meet the federal regulations associated with the program.<sup>28</sup>

Despite the important support given to the families who receive subsidies through CCDF, the program is fundamentally limited in funding and policy design.<sup>29</sup> Limitations include the insufficient federal funding levels and inequitable implementation and funding distribution at the state level.<sup>30</sup> Due to stagnant funding and inadequate accounting for inflation,<sup>31</sup> child care subsidies are not reaching enough eligible families.<sup>32</sup> Although Black children have the highest rates of access to CCDF subsidies among all eligible children, the vast majority (79 percent) of potentially eligible Black children are not accessing the subsidies.<sup>33</sup> States are also underserving eligible Latinx and Asian children and families, with just 6 percent and 3 percent benefiting from CCDF, respectively.<sup>34</sup>

CCDF's ineffective program design—driven in part by a long history of racist and xenophobic biases towards Black, Latinx families, and immigrant families—has created significant gaps in child care assistance policies and funding.<sup>35</sup> Restrictions or administrative burdens around the documentation of work schedules, and lack of resources and information in families' preferred language, block families of color, immigrant families, and those who work variable shifts from participating in CCDF.<sup>36</sup> As a result of these gaps, only 1 in 6 children who qualify for the CCDF subsidies actually receive them.<sup>37</sup>

Any redesign of CCDF must center Black families and immigrant families—who tend to face restricted access to employment, wealth-building, education, and housing that impedes their ability to access child care subsidies, prove eligibility, and provide documentation.<sup>38</sup>

## A New Vision for CCDF to Advance Racial Justice

### NEW GOALS

With significant additional resources and bold policy reforms—CCDF could serve as the basis of an anti-racist system that promotes and supports child care that meets families' needs and provides good jobs. Such a program would ensure equitable access to affordable child care that meets all families' diverse needs and provides fair compensation for child care workers, particularly the nearly 40 percent of child care workers who are women of color.<sup>39</sup>

This section introduces a vision for an anti-racist CCDF program, and the following sections provide several recommendations that federal and state policymakers and program administrators should implement, including significant investments paired with effective anti-racist policies. To ensure equitable access to affordable child care that meets families' diverse needs, CCDF and all proposals for implementation should be rooted in anti-racist principles to advance racial and gender equity for families and educators.<sup>40</sup>

The Georgetown Center on Poverty and Inequality and the National Women's Law Center envision a new CCDF that advances racial and gender justice through four overarching goals:

### 1. Eliminate Racial Inequities in the Child Care System

To address and eliminate racial inequities in a re-envisioned CCDF, policymakers and administrators must first remove and replace existing racism-rooted policies and regulations. They must also build policies and regulations that are inclusive of all types of families and that fairly compensate, support, and respect early childhood educators, who are disproportionately women of color and immigrant women.<sup>41</sup> It is

essential to center the needs of families of color, families with low incomes, people with disabilities, and other groups with intersecting marginalized identities to transform CCDF into a program that actively advances racial, gender, and economic equity. Pairing universal eligibility with targeted, community-based outreach efforts would help ensure communities of color are proactively included in the program.

## 2. Establish Child Care as a Universal Right

Every child should have a right to child care that meets their family's needs, regardless of their race, gender, abilities, zip code, family income, family structure, sexual orientation, religion, or immigration status. A fully funded universal child care program would build public support for such a program and ensure that all families, particularly Black and immigrant families, are able to access the program's benefits.<sup>42</sup> A universal program would do away with the burdensome eligibility criteria and processes, which would allow families of all backgrounds—especially Black and Brown families who have been historically underserved—to access affordable child care that meets families' diverse needs.

## 3. Value Child Care as a Public Good

Child care is the work that makes other work possible. Affordable child care that meets families' diverse needs is the foundation for this country's present and future economy because it enables families—especially mothers—to work or attend school and supports children's healthy growth and development.<sup>43</sup> The social benefits of child care subsidy expansions far outweigh the costs.<sup>44</sup> As such, the federal government has a responsibility to adequately and equitably fund the child care system. Transforming the child care system would require a radical shift from our country's baseline of historical under-valuing of child care labor, which has been and is largely provided by women of color compared to other sectors.<sup>45</sup> Child care must be recognized as a public good that yields long-term benefits for children, women, families, businesses, the economy, and society overall—and as an important avenue for closing stark racial and gender gaps in wealth, well-being, and opportunity.

## 4. Build an Inclusive Child Care System

A truly inclusive child care system should benefit all families and types of educators—especially those who are historically marginalized and underserved—by taking into account families' and educators' diverse needs and preferences. Families and educators must have a leadership role in informing and designing the new anti-racist program structure. "Quality child care" and adequate work supports might vary by community. For example, for Black and Latinx families, family, friend, and neighbor (FFN) care is a common and preferred choice, especially if parents are working non-traditional hours.<sup>46, 47</sup> An inclusive child care program will provide a broad range of desired options for families who have been historically marginalized and excluded from access to child care, and will provide the necessary comprehensive supports for educators in various settings.

Achieving these goals will require the federal government to adequately and equitably fund the child care system to allow all children access to education and care that meets their families' needs provided by a well-compensated, well-supported workforce.

## Recommendations

This section proposes six recommendations for transforming the CCDF program to advance racial, gender, and economic equity in a more equitable child care system.

### ROBUST FEDERAL FUNDING: FULFILLING THE RESPONSIBILITY TO ADEQUATELY & EQUITABLY FUND CHILD CARE

A long history of racist biases towards Black and Latinx families as “undeserving” of public assistance has contributed to chronic underinvestment in the child care system and inequitable funding schemes, creating significant racial inequities in accessing child care that meets families’ diverse needs.<sup>48</sup> Current CCDF funding levels only support a fraction of the children who qualify for the subsidies,<sup>49</sup> and Black and Latinx children are less likely than white children to be enrolled in quality child care settings.<sup>50</sup>

Inadequate funding forces states, educators, and families to face harmful trade-offs, leading to racially disparate outcomes. For example, in states with a growing share of residents in households with low incomes—disproportionately Black, Brown, and immigrant families<sup>51</sup>—stagnant funding prevents these growing populations from receiving child care assistance.<sup>52</sup> Families absorb child care costs that strain their budgets, with out-of-pocket expenses accounting for a much greater share of household income for families with low- and middle-incomes than for affluent families, who are disproportionately white.<sup>53</sup> Low funding also makes it difficult for child care providers serving children with subsidies—who are disproportionately Black and Latinx<sup>54</sup>—to afford key resources and retain educators while operating on razor-thin margins.<sup>55</sup> Inadequate CCDF funding rates and policies also discourage programs from reaching underserved families—such as families with children with disabilities and families with variable housing—who may be seen as cost liabilities to programs.<sup>56</sup> Early educators, who are predominantly women and disproportionately women of color, are subsidizing the broken child care system with their poverty-level wages, leading to staff shortages and high turnover rates.<sup>57</sup>

Inequitable state funding schemes further exacerbate racial disparities in accessing care that meets families’ diverse needs. To meet the goals of improving the quality of child care and giving families more information about their options, many states adopted tiered payment policies that award additional subsidy funding to child care programs with high-quality ratings based on state criteria.<sup>58</sup> The reauthorization of CCDBG in 2014 included enhanced regulation of subsidized programs and encouraged states to institute tiered subsidy reimbursement rates.<sup>59</sup> In 2022, 41 states and the District of Columbia had tiered payment policies.<sup>60</sup> However, data suggest that child care programs serving larger numbers of Black and Brown children are less likely to receive higher-quality ratings and the higher payments and other benefits that are awarded to higher-rated programs.<sup>61</sup> Some child care scholars and advocates argue that differences in the quality ratings may result from racially biased evaluation tools rather than actual differences in the quality of instruction.<sup>62</sup> In addition, quality rating systems often fail to capture the strengths of home-based child care settings. As a result, quality rating systems have contributed to an increasing concentration of subsidies in center-based child care programs relative to home-based providers. This limits access to an important option for families with low incomes, especially single working mothers of color, who disproportionately rely on home-based care.<sup>63</sup>

Robust, equitable funding levels and mechanisms would allow states to make policy decisions based on the needs of families and educators rather than budget constraints and invest in their administrative infrastructure to mitigate inequitable implementation that harms families of color.<sup>64</sup> Robust funding would also allow child care providers to secure financial stability, raise educator salaries and supports, recruit and retain educators, and improve and expand facilities, all of which are key to providing child care that meets families’ and educators’ diverse needs. Typically, programs that already achieve higher quality ratings due to biased measurements are rewarded, while home-based caregivers are neglected.<sup>65</sup> Robust funding levels should be paired with anti-racist funding measures, such as replacing tiered

funding with substantial increases in base subsidy rates and establishing progressive funding formulas. This would provide financial and other supports to all programs, not just those deemed to be high-quality. These steps would help create a national child care system that gives all children access to child care that is culturally responsive, respects educators, and meets families' diverse needs.<sup>66</sup>

## UNIVERSAL ELIGIBILITY: PROVIDING ACCESS TO AFFORDABLE CHILD CARE FOR ALL FAMILIES TO ADVANCE RACIAL EQUITY

Under current federal law, an eligible family must satisfy the following conditions to receive CCDF assistance:<sup>67</sup>

- Have a child under age 13 (or under 19 if the child has disabilities);
- Have a family income at or below 85 percent of the state median income;
- The child should either receive (or need to receive) protective services or reside with at least one parent who is working or attending a job training or educational program (although all states must allow families who lose a job to continue receiving child care assistance for at least three months); and
- The child should be a U.S. citizen or qualified immigrant.

State child care agencies have significant discretion to impose stricter eligibility requirements, and many do so under budget constraints, perpetuating racial inequities in access and takeup. In 2022, a family with an income above 200 percent of the federal poverty guidelines (\$46,060 per year for a family of three) was ineligible for child care assistance in 24 states.<sup>68</sup> Low-income eligibility levels leave families who are ineligible for subsidies—many of whom still have low incomes and are families of color—unable to afford child care.<sup>69</sup> On the other hand, states also have some flexibility to set expanded eligibility criteria,<sup>70</sup> and even if they are not allowed to use federal funds for it, they can—and in a few cases do—use their own state funds to serve families beyond the federal criteria, such as families with incomes above 85 percent or children who are not citizens.<sup>71, 72</sup> In addition, states can use federal funds to allow families to qualify while searching for a job.<sup>73</sup>

Policies that restrict child care assistance based on families' participation in work or other activities, even if intended to steer resources to those families who have the greatest need for child care (in order to participate in those activities), can reinforce racial inequities. Work and activities requirements for CCDF fail to take into account that parents often need child care prior to getting a job or participating in education activities. These requirements can also be burdensome for parents—for example, requiring paperwork or time that parents may not have, resulting in inequitable access to assistance.

A fully-funded, universal child care program would eliminate inequitable eligibility requirements based on family income, work activities, immigration status, and other family circumstances so that families from all backgrounds could access child care that meets their diverse needs. Such a program would help mitigate these harmful impacts of structural racism and close developmental gaps starting from the early years—by expanding access, promoting stability in child care arrangements, and reducing burdensome paperwork that can disqualify families who are technically eligible. It would also help families with low incomes—who are disproportionately Black and Brown families—move out of poverty by reducing child care costs and balancing work and caregiving needs.

## UNIVERSAL COVERAGE: REACHING AS MANY CHILDREN AS POSSIBLE TO CLOSE RACIAL/ETHNIC GAPS

Current CCDF policies make it difficult for Black and Latinx families to access child care assistance—despite being eligible—through bureaucratic disenfranchisement. CCDF's history as a welfare program has led to a

persistent focus on compliance and rooting out fraud, as manifested in the burdensome eligibility and documentation requirements, as well as the biased treatment of Black and Latinx families seeking assistance.<sup>74</sup>

CCDF applications are often long and complex, with burdensome interview and documentation requirements for families trying to apply or recertify for child care assistance. These requirements can create particular challenges for Black, Latinx, and immigrant families with low incomes who face many cultural and structural barriers—based on literacy, language, internet access, transportation, nontraditional work hours, and more—that impede access to information, ease of documentation, and successful enrollment in these programs.<sup>75</sup>

As stated in the last section, universal eligibility would significantly simplify the processes of determining subsidy eligibility and enrollment. Families would no longer have to provide documentation on income, work activities, or immigration status in order to receive child care subsidies, frequently re-apply to subsidies, or jump over other administrative barriers. Equally important is to proactively ensure equal access to information as well as to reach out to and rebuild trust with communities the CCDF program has historically excluded and marginalized.

Under an anti-racist CCDF, program information and the enrollment process should be available for participants who speak languages other than English; have varying literacy levels; have disabilities; work nontraditional hours; have unreliable access to housing, transportation, and the internet; and experience other systemic barriers—all of which disproportionately affect Black, Latinx, and immigrant families.<sup>76</sup> Removing these barriers would require significant investments in the infrastructure of service provision, such as more access points, more staff dedicated to community engagement and translation, anti-bias and cultural competency training, and updated technology.<sup>77</sup>

Disparate treatment of families of color resulting from program administrators' conscious and implicit bias—reflecting the harmful, racist stigmas associated with welfare participants—can further undermine access. When seeking public assistance and social services, Black and Latinx applicants are more likely than white applicants to report unfair treatment or judgment based on race or ethnicity, and these differences are especially stark among adults with low incomes.<sup>78</sup> To improve equity and widen access to services for families, it is essential to create a welcoming experience for families throughout the outreach, application, and enrollment processes. State and community leaders should define equitable access based on experiences and insights from families and co-develop strategies that address challenges to equitable access along with families and community partners.<sup>79</sup> Doing so would require policymakers, administrators, and caseworkers to reimagine child care as a right, do the hard work of repairing past damage, and rebuild trust with communities of color.

## FAIR COMPENSATION & WORK CONDITIONS: ACHIEVING EQUITY & JUSTICE FOR EARLY CHILDHOOD EDUCATORS

A strong child care system depends on providing educators with fair compensation and just work conditions and pushes back against harmful trends of undervaluing labor disproportionately carried out by women of color. Fair compensation and work conditions lead to greater respect and dignity for early childhood educators—whose work makes other work possible.

Early childhood educators are the backbone of a robust child care infrastructure,<sup>80</sup> but they are some of the lowest-paid workers. In regulated care settings, early childhood educators are predominantly women and disproportionately women of color and immigrant women.<sup>81</sup> With a median hourly wage of \$13.71 in 2022, a typical early childhood educator who works full-time, year-round would earn \$28,519 a year.<sup>82</sup> Family, friends, and neighbor (FFN) caregivers earn even less income from child care and face significant discrimination, challenges, and exclusion from the formal child care system.<sup>83</sup>

The lack of public investment in child care, due to a long history of structural racism and sexism in this country, has resulted in child care costs being transferred to families and programs, and further down the line, to early childhood educators who subsidize the system with their low wages and limited benefits. This broken model leads to staff shortages and high turnover rates, undermining the continuity and quality of learning and care for children.<sup>84</sup> Educators' wage gains are lower, and teacher turnover rates are higher in programs that serve families with low incomes.<sup>85</sup>

Significant, long-term public investments must be made to improve the quality of child care jobs and, in turn, address educator shortages and improve the quality of care. A strong system would advance economic and racial equity. This includes providing a thriving wage with benefits, ensuring predictable and flexible scheduling practices, supporting ongoing training and career advancement, and guaranteeing the right to collective bargaining. Carefully evaluated financing mechanisms should be in place to ensure that the increased funding translates into better compensation for the child care workforce.<sup>86</sup>

Importantly, early childhood educators in all types of programs—including those who provide care in their own homes, nearly half of whom are women of color<sup>87</sup>—should have access to increased resources and support in order to meet families' diverse needs. Home-based programs outnumber center-based programs but face more precarious financial and work conditions than center-based programs.<sup>88</sup> The number of licensed small family child care providers fell by 48 percent from 2005 to 2017 while the number of licensed child care centers increased by 2 percent.<sup>89</sup> Child care scholars and advocates point to the increased regulation of subsidized programs and quality measurements, without providing sufficient funding for the states, as factors contributing to the decrease in home-based child care.<sup>90</sup> The decline of home-based child care programs makes it increasingly difficult for parents with low incomes to balance work and care needs.<sup>91</sup> An improved child care system should remedy these harmful policy consequences to adequately support home-based care programs and center the needs of families with low incomes—who are disproportionately in communities of color.

## INCLUSIVE CHILD CARE: ENSURING WELCOMING & NURTURING EXPERIENCES FOR ALL CHILDREN

The re-envisioned anti-racist child care system should be anti-discriminatory and inclusive for children of all races and ethnicities. As part of this system, there should be investments in trainings and curricula, and policies to ensure that all child care educators have access to the appropriate supports and resources to nurture the healthy development of children by addressing and celebrating differences and needs.

While all educators need supports and trainings, there is no “one-size-fits-all” solution. All professional trainings and supports should reflect the various accessibility requirements (location, language, and time of offerings) for all educator populations. Policies requiring additional training must also work to remove the access, workforce, and economic barriers that educators may face when trying to access additional training.

To ensure that children's experiences in child care respect and respond to their cultural, racial, and ethnic backgrounds and their abilities and needs, trainings for educators must help meet the developmental and socioemotional needs of children and families. One of the many trainings that must be provided is education on how to handle behavior concerns without the use of harsh punishment such as expulsion or suspension. Children of color—primarily Black and Brown children—are more often expelled or suspended within child care and early learning settings, perpetuating systemic racism.<sup>92</sup> To dismantle racial inequities in child care, trainings for educators must have a holistic approach, which includes understanding child development and appropriate behavioral expectations, anti-bias and anti-racist professional development, culturally responsive and sustaining practices, and professional development efforts that prepare educators to foster positive relationships with family and community members.<sup>93</sup>



The anti-racist CCDF should include:

- Requirements and resources for trainings for teachers and curricula that encourage inclusive learning environments for children;
- Policies that prohibit or severely limit suspension, expulsion, and removal for all children in publicly funded programs;
- Monitoring and data collection and analysis to track discipline practices in early years and identify and disproportionate discipline of Black and Brown children; and
- Coaching and supports to remedy discriminatory practices and ensure child care programs offer inclusive environments.

## DIVERSE CHILD CARE OPTIONS: ENSURING INCLUSIVENESS & ACCESS FOR ALL TYPES OF EDUCATORS

Providing a new system of universal child care also means ensuring the availability of different care options for families that truly meet their needs. Wide-ranging access to different types of programs, offering a variety of settings, hours, and culturally relevant selections, will better allow for family choice and is critical to the success of a re-envisioned, anti-racist CCDF.

An equitable system that works for all families and educators requires support for all types of child care programs—including centers both large and small, school-based programs, private and non-profit, and family child care homes, as well as family, friend, and neighbor care. All types of programs should be able to receive subsidies to serve families and should have access to resources and supports, including financial assistance for facilities and supplies, coaching and mentoring, and professional development opportunities. Including the full array of child care programs is important for meeting the diverse needs of families and enabling them to choose the care that best meets their needs.<sup>94</sup>

Many families struggle to find child care, and families with specific circumstances and needs, such as families with parents working nontraditional hours, families with children with disabilities, or families looking for dual language programs or educators with the same cultural or ethnic background, carry an even heavier burden.<sup>95</sup> Families require a full range of options in order to meet these needs. For example, many families working nights, weekends, or early morning hours turn to home-based care because it offers more flexibility for children than child care centers, 92 percent of which are closed during these nontraditional hours.<sup>96</sup> Additionally, home-based educators are more likely to hold part-time spots or occasional spots for families who do not need full-time care.<sup>97</sup> Supporting a full range of providers is also important for a racially and culturally diverse educator workforce. Often, families prefer a child care program with cultures similar to their own. A culturally relevant program and educator can help children “understand their own cultures and to develop a sense of belonging.”<sup>98</sup>

The supply of child care programs is limited overall, and a smaller number accept child care subsidies.<sup>99</sup> To increase provider enrollment in the subsidy system, particularly home-based programs, the application process for providers must be more accessible and streamlined, with applications in various languages and formats, lower administrative burdens, and more support available (particularly peer and community-based) to complete the process. Additionally, subsidy system policy regulations must equitably provide subsidies across and between all programs. Without equitable policies, programs with fewer resources and facing other structural disadvantages—which are often those operated by women of color<sup>100</sup>—will be unable to participate, and those who do will not have the resources to maintain their businesses. Payment rates for all programs should be adequate to cover the costs of providing sufficient compensation for educators and other staff, maintaining and purchasing supplies and materials, and other components necessary for a quality learning environment. Payment practices in the subsidized system should also reflect current practices in the private market and include pre-payment rather

than reimbursement. For example, payment should be based on a child's enrollment rather than their attendance since programs still have fixed costs for facilities and staff, even when children are out due to illness or other reasons.<sup>101</sup> Payment based on enrollment is not only more equitable for the program, but it is also more equitable for families, as a child care program may be reluctant to serve chronically ill children as it could lead to less reliable payments.

## Conclusion

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A United States where all families have access to child care that meets their needs and educators are fairly compensated is within reach. To achieve this vision, policymakers and the public must apply an anti-racist lens to existing programs and funding, making necessary changes within the flexibility allowed in CCDF. However, this alone will not be enough. An anti-racist program will require moving towards developing a universal child care system that centers equity.

To build this new equitable and sustainable child care system where all children have access to quality child care, federal and state governments must substantially increase funding levels and develop equity-centered funding approaches. Affordable child care that meets families' needs must be reimagined as a universal right deserved by all, not a privilege to those with ample resources. Adequate public funding can expand child care options for all children that meet their families' diverse needs, increase pay and support for all types of programs and educators, and reduce child care costs for families. Mechanisms to allow ongoing feedback from families and educators—particularly those from Black and Brown communities—must be developed with ongoing adjustments to ensure child care policies are, in fact, meeting families' and educators' needs and advancing equity.

An anti-racist child care system must be accomplished in tandem with addressing systemic racism in housing, education, health care, the labor market, the tax code, social assistance programs, and other aspects of our social and economic lives. A robust, fully-funded child care system can and should be used as a tool for advancing gender and racial equity toward a society where all children, families, and communities can thrive.

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# Endnotes

- 1 Alternatively referred to as the Child Care and Development Block Grant (CCDBG) program.
- 2 While quality is a major area of focus in child care and early learning policy, research, and practice, definitions of “high-quality” or “quality” experiences vary. Additionally, these definitions often do not take into account priorities of diverse communities, leading to some advocates calling out the current quality rating and improvement system (QRIS) as racist. For the purposes of this brief, the authors chose not to use either “quality” or “high-quality,” but instead refer to child care options that “meet families’ diverse needs.” This includes center-, home-, and faith-based care; family, friend, and neighbor care; care during nontraditional hours; and cultural and linguistic preferences, among other priorities for families in choosing care. See Lieberman, Abbie. “Meaningfully Incorporating Equity into QRIS.” *New America*, 25 July 2022. Available at <https://www.newamerica.org/education-policy/edcentral/meaningfully-incorporating-equity-into-qrisc/>. Perez, Giannina, et al. “Quality Improvement in California.” *Childcare Resource & Referral Network*, 14 August 2020. Available at <https://rnetwork.org/assets/general-files/Master-Plan-QRIS.pdf>.
- 3 Schneider, Allie, and Hailey Gibbs. “Disparities in Housing, Health Care, Child Care, and Economic Security Affect Babies for Life.” *Center for American Progress*, 7 December 2022. Available at <https://www.americanprogress.org/article/disparities-in-housing-health-care-child-care-and-economic-security-affect-babies-for-life/#:~:text=Unfortunately%2C%20the%20children%20who%20are,associated%20with%20these%20care%20arrangements>.
- 4 “A Lifetime’s Worth of Benefits: The Effects of Affordable, High-Quality Child Care on Family Income, the Gender Earnings Gap, and Women’s Retirement Security.” *National Women’s Law Center & Center for Law and Social Policy*, 2021. Available at <https://nwlc.org/resource/a-lifetimes-worth-of-benefits-the-effects-of-affordable-high-quality-child-care-on-family-income-the-gender-earnings-gap-and-womens-retirement-security/#>.
- 5 Varying family needs may be based on and shaped by financial, geographical, cultural, and other factors such as those related to family structure, resources, and employment. See Sethi, Shiva, Christine Johnson-Staub, and Katherine Gallagher Robbins. “An Anti-Racist Approach to Supporting Child Care Through COVID-19 and Beyond.” *Center for Law and Social Policy*, 14 July 2020. Available at <https://www.clasp.org/publications/report/brief/anti-racist-approach-supporting-child-care-through-covid-19-and-beyond/>.
- 6 Bailey, Zinzi D., et al. Structural racism and health inequities in the USA: evidence and interventions.” *Lancet*, 389(10077): 1453-1463, 8 April 2017. Available at <https://pubmed.ncbi.nlm.nih.gov/28402827/>.
- 7 LePage, Brooke. “The Child Care and Early Learning Workforce Is Underpaid and Women are Paying the Price.” *National Women’s Law Center*, May 2023. Available at <https://nwlc.org/wp-content/uploads/2023/05/child-care-workers-5.25.23v3.pdf>.
- 8 Office of Child Care. “Child Care and Development Fund (CCDF) Report on States’ Priorities for Child Care Services: Fiscal Year.” *Administration for Children & Families*, October 2021. Available at [https://www.acf.hhs.gov/sites/default/files/documents/occ/priorities\\_report\\_fy\\_2020.pdf#:~:text=An%20estimated%201.9%20million%20children%20and%20the%20age,53.1%20million%20children%20under%20the%20age%20of%2013](https://www.acf.hhs.gov/sites/default/files/documents/occ/priorities_report_fy_2020.pdf#:~:text=An%20estimated%201.9%20million%20children%20and%20the%20age,53.1%20million%20children%20under%20the%20age%20of%2013).
- 9 Schulman, Karen. “Precarious Progress: State Child Care Assistance Policies 2022.” *National Women’s Law Center*, May 2023. Available at <https://nwlc.org/wp-content/uploads/2023/06/State-of-Child-Care-2023-FINAL.pdf>.
- 10 West, Emily. “The Double-Edged Sword of Motherhood Under American Slavery.” *Omohundro Institute of Early American History & Culture*, 7 May 2019. Available at <https://blog.oieahc.wm.edu/the-double-edged-sword/>.
- 11 Banks, Nina. “Black women’s labor market history reveals deep-seated race and gender discrimination.” *Economic Policy Institute*, 19 February 2019. Available at <https://www.epi.org/blog/black-womens-labor-market-history-reveals-deep-seated-race-and-gender-discrimination/>.
- 12 Ertman, Thalia. “The Lanham Act and Universal Childcare During World War II.” *Friends of the National World War II Memorial*, 27 June 2019. Available at <https://www.wiimemorialfriends.org/blog/the-lanham-act-and-universal-childcare-during-world-war-ii#:~:text=On%20June%2029%2C%201943%2C%20the.duration%20of%20World%20War%20II>.
- 13 Michel, Sonya. “The History of Child Care in the U.S.” *Virginia Commonwealth University*, 19 January 2011. Available at <https://socialwelfare.library.vcu.edu/programs/child-care-the-american-history/>.
- 14 “History of Federal Funding for Child Care and Early Learning.” *Bipartisan Policy Center*, October 2019. Available at [https://bipartisanpolicy.org/download/?file=/wp-content/uploads/2019/10/WEB\\_BPC\\_ECH-History-Brief\\_R01.pdf](https://bipartisanpolicy.org/download/?file=/wp-content/uploads/2019/10/WEB_BPC_ECH-History-Brief_R01.pdf).
- 15 Vogtman, Julie. “Undervalued: A Brief History of Women’s Care Work and Child Care Policy in the United States.” *National Women’s Law Center*, 2017. Available at [https://nwlc.org/wp-content/uploads/2017/12/final\\_nwlc\\_Undervalued2017.pdf](https://nwlc.org/wp-content/uploads/2017/12/final_nwlc_Undervalued2017.pdf).
- 16 Roth, William. “The Politics of Daycare: The Comprehensive Child Development Act of 1971 Discussion Papers 369-76.” *Education Resources Information Center*. Available at <https://eric.ed.gov/?id=ED138680>.
- 17 Roth, William. “The Politics of Daycare: The Comprehensive Child Development Act of 1971.” *Institute for Research on Poverty*, December 1976. Available at <https://www.irp.wisc.edu/publications/dps/pdfs/dp36976.pdf>.
- 18 Richard Nixon. “Veto of the Economic Opportunity Amendments of 1971.” *The American Presidency Project*. Available at <https://www.presidency.ucsb.edu/node/240367>.
- 19 Michel, Sonya. “Children’s Interests/Mother’s Rights: The Shaping of Americas’ Child Care Policy.” *Political Science Quarterly*, 115(3), Fall 2000. Available at <https://academic.oup.com/psq/article-abstract/115/3/477/6962506?login=false>.
- 20 Vogtman, Julie. “Undervalued: A Brief History of Women’s Care Work and Child Care Policy in the United States.” *National Women’s Law Center*, 2017. Available at [https://nwlc.org/wp-content/uploads/2017/12/final\\_nwlc\\_Undervalued2017.pdf](https://nwlc.org/wp-content/uploads/2017/12/final_nwlc_Undervalued2017.pdf).
- 21 Ansell, A. “New right, new racism: Race and reaction in the United States and Britain.” *New York University*, 1997. <https://doi.org/10.1007/978-1-349-13927-9>.
- 22 PRWORA expanded work documentation requirements and placed limits to access for undocumented and mixed-status immigrant families for cash assistance. See Minoff, Elisa. “The Lasting Legacy of Exclusion: How the Law that Brought Us Temporary Assistance for Needy Families Excluded Immigrant Families & Institutionalized Racism in our Social Support System.” *Georgetown Center for Poverty and Inequality*, 19 August 2021. Available at <https://www.georgetownpoverty.org/issues/lasting-legacy-of-exclusion/>.
- 23 “A Brief History of the AFDC Program.” *Office of the Assistant Secretary for Planning and Evaluation*. Available at <https://aspe.hhs.gov/sites/default/files/private/pdf/167036/1history.pdf>.
- 24 The four programs consolidated into CCDF included the Aid to Families with Dependent Children (AFDC) Child Care Program, the Transitional Child Care (TCC) program, the AtRisk Child Care program, and the Child Care and Development Block Grant (CCDBG). See Long, Sharon K., et al. “Child Care Assistance Under Welfare Reform: Early Responses by the State.” *Urban Institute*, 1 August 1998. Available at [https://webarchive.urban.org/publications/308043.html#\\_1](https://webarchive.urban.org/publications/308043.html#_1).
- 25 Matthews, Hannah. “Immigrant Eligibility for Federal Child Care and Early Education Programs.” *Center for Law and Social Policy*, April 2017. Available at <https://clasp.org/sites/default/files/public/resources-and-publications/publication-1/Immigrant-Eligibility-for-ECE-Programs.pdf>.
- 26 Neubeck, K. J., and Cazenave, N. A. “Welfare racism: Playing the race card against America’s poor.” *Routledge*, 2022. <https://www.routledge.com/Welfare-Racism-Playing-the-Race-Crd-Against-Americas-Poor/Neubeck-Cazenave/p/book/9780415923415>.
- 27 “The CCDF Program.” *Child Care Technical Assistance Network*. Available at <https://childcareta.acf.hhs.gov/ccdf-fundamentals/ccdf-program>.

- 28 “OCC Fact Sheet.” U.S. Department of Health & Human Services, 9 May 2022. Available at <https://www.acf.hhs.gov/occ/fact-sheet>.
- 29 Wilensky, Rachel, et al. “Expanding Access to Child Care Assistance: Opportunities in the Child Care and Development Fund.” Center for Law and Social Policy, 8 June 2023. Available at <https://www.clasp.org/publications/report/brief/expanding-access-child-care-development-fund/>.
- 30 Ibid.
- 31 89 FR 15366. “Improving Child Care Access, Affordability, and Stability in the Child Care and Development Fund (CCDF).” U.S. Health and Human Services Department, 1 March 2024. Available at <https://www.federalregister.gov/documents/2024/03/01/2024-04139/improving-child-care-access-affordability-and-stability-in-the-child-care-and-development-fund-ccdf>.
- 32 GAO-21-245R. “Child Care: Subsidy Eligibility and Receipt, and Wait Lists.” U.S. Government Accountability Office, 18 February 2021. Available at <https://www.gao.gov/products/gao-21-245r>.
- 33 Ullrich, Rebecca, Stephanie Schmit, and Ruth Cosse. “Inequitable Access to Child Care Subsidies.” The Center for Law and Social Policy, April 2019. Available at [https://www.clasp.org/wp-content/uploads/2022/01/2019\\_inequitableaccess.pdf](https://www.clasp.org/wp-content/uploads/2022/01/2019_inequitableaccess.pdf).
- 34 Ibid.
- 35 Hollett, Karen Babbs, and Erica Frankenberg, “A Critical Analysis of Racial Disparities in ECE Subsidy Funding.” Education Policy Analysis Archives, 30(14), 8 February 2022. Available at <https://doi.org/10.14507/epaa.30.7003>.
- 36 Schmit, S., and C. Walker. “Disparate Access: Head Start and CCDBG by Race and Ethnicity.” Center for Law and Social Policy, 30 March 2017. Available at <http://www.clasp.org/resources-and-publications/publication-1/Disparate-Access.pdf>.
- 37 Chien, Nina. “Factsheet: Estimates of Child Care Eligibility & Receipt for Fiscal Year 2019, Office of the Assistant Secretary for Planning and Evaluation.” U.S. Department of Health and Human Services. Available at <https://aspe.hhs.gov/reports/child-care-eligibility-fy2019>.
- 38 Adams, Gina, and Eleanor Pratt, “Assessing Child Care Subsidies through an Equity Lens: A Review of Policies and Practices in the Child Care and Development Fund.” Urban Institute, September 2021. Available at <https://www.urban.org/sites/default/files/publication/104777/assessing-child-care-subsidies-through-an-equity-lens.pdf>.
- 39 McLean, C. “Early childhood workforce index 2020.” Center for the Study of Child Care Employment, February 2021. Available at <https://escholarship.org/content/qt5k46c178/qt5k46c178.pdf>.
- 40 “Principles for Child Care: A Vision for Investing in High-Quality, Affordable Child Care.” National Women’s Law Center, October 2019. Available at <https://nwlc.org/resource/principles-for-child-care-a-vision-for-investing-in-high-quality-affordable-child-care/#>
- 41 Mefferd, Eve, and Dawn Dow. “The US Child Care System Relies on Women of Color, but Structural Barriers Systematically Disadvantage Them.” Urban Institute, 14 June 2023. Available at <https://www.urban.org/urban-wire/us-child-care-system-relies-women-color-structural-barriers-systematically-disadvantage>.
- 42 Floyd, Ife, et al. “TANF Policies Reflect Racist Legacy of Cash Assistance.” Center on Budget and Policy Priorities, 4 August 2021. Available at <https://www.cbpp.org/research/income-security/tanf-policies-reflect-racist-legacy-of-cash-assistance>.
- 43 “Principles for Child Care: A Vision for Investing in High-Quality, Affordable Child Care.” National Women’s Law Center, 10 October 2019. Available at <https://nwlc.org/resource/principles-for-child-care-a-vision-for-investing-in-high-quality-affordable-child-care/>.
- 44 Hartley, Robert Paul, et al. “A Benefit-Cost Analysis of Child Care Subsidy Expansions: The New York State Case.” Center on Poverty and Social Policy at Columbia University, 29 August 2022. Available at <https://www.povertycenter.columbia.edu/publication/2022/child-care-subsidy-benefit-cost-nys>.
- 45 Lepage, Brooke. “The Child Care and Early Learning Workforce is Underpaid and Women are Paying the Price.” National Women’s Law Center, May 2023. Available at <https://nwlc.org/wp-content/uploads/2023/05/child-care-workers-5.25.23v3.pdf>.
- 46 Powell, Anna, et al. “Parent Preferences in Family, Friend, Neighbor, and Nanny Care: A Study of Family, Friend, Neighbor (FFN), and Nanny Care in California – Part One.” Center for the Study of Child Care Employment, 2 May 2023. Available at <https://csce.berkeley.edu/publications/report/parent-preferences-in-family-friend-neighbor-and-nanny-care/>.
- 47 Schilder, Diane, et al. “What Child Care Arrangements Do Parents Want During Nontraditional Hours: Insights from parents in Connecticut, the District of Columbia, and Oklahoma.” Urban Institute, 30 March, 2022. Available at <https://www.urban.org/research/publication/what-child-care-arrangements-do-parents-want-during-nontraditional-hours>.
- 48 Hollett, Karen Babbs, and Erica Frankenberg, “A Critical Analysis of Racial Disparities in ECE Subsidy Funding.” Education Policy Analysis Archives, 30(14), 8 February 2022. Available at <https://doi.org/10.14507/epaa.30.7003>.
- 49 “The Economics of Child Care Supply in the United States.” U.S. Department of Treasury, September 2021. Available at <https://home.treasury.gov/system/files/136/The-Economics-of-Childcare-Supply-09-14-final.pdf>.
- 50 Chung, Saras, et al. “Expanding Access to High-Quality Early Care and Education through a Racial Equity Lens.” Federal Reserve Bank of St. Louis. Available at <https://www.stlouisfed.org/community-development/publications/expanding-access-to-high-quality-early-care-education-through-racial-equity-lens>.
- 51 Simms, Margaret C., Karina Fortuny, and Everett Henderson. “Racial and Ethnic Disparities Among Low-Income Families.” Urban Institute, August 2009. Available at <https://www.urban.org/sites/default/files/publication/32976/411936-racial-and-ethnic-disparities-among-low-income-families.pdf>.
- 52 Ullrich, Rebecca, Stephanie Schmit, and Ruth Cosse. “Inequitable Access to Child Care Subsidies.” The Center for Law and Social Policy, April 2019. Available at [https://www.clasp.org/wp-content/uploads/2022/01/2019\\_inequitableaccess.pdf](https://www.clasp.org/wp-content/uploads/2022/01/2019_inequitableaccess.pdf).
- 53 “Transforming the Financing of Early Care and Education.” National Academies of Sciences, Engineering, and Medicine, 2018. Available at <https://nap.nationalacademies.org/catalog/24984/transforming-the-financing-of-early-care-and-education>.
- 54 Hollett, Karen Babbs, and Erica Frankenberg. “A Critical Analysis of Racial Disparities in ECE Subsidy Funding.” Education Policy Analysis Archives, 30(14): 8 February 2022. Available at <https://epaa.asu.edu/index.php/epaa/article/view/7003>.
- 55 Mefferd, Eve, and Dawn Dow. “The US Child Care System Relies on Women of Color, but Structural Barriers Systematically Disadvantage Them.” Urban Institute, 14 June 2023. Available at <https://www.urban.org/urban-wire/us-child-care-system-relies-women-color-structural-barriers-systematically-disadvantage>.
- 56 Schneider, Allie, and Hailey Gibbs. “Disparities in Housing, Health Care, Child Care, and Economic Security Affect Babies for Life.” Center for American Progress, 7 December 2022. Available at <https://www.americanprogress.org/article/disparities-in-housing-health-care-child-care-and-economic-security-affect-babies-for-life/>.
- 57 LePage, Brooke. “The Child Care and Early Learning Workforce Is Underpaid and Women are Paying the Price.” National Women’s Law Center, May 2023. Available at <https://nwlc.org/wp-content/uploads/2023/05/child-care-workers-5.25.23v3.pdf>.
- 58 Isaac, Julia B., Erica Greenberg, and Teresa Derrick-Mills. “Subsidy Policies and the Quality of Child Care Centers Serving Subsidized Children.” Urban Institute, February 2018. Available at [https://www.urban.org/sites/default/files/publication/96361/subsidy\\_policies\\_and\\_the\\_quality\\_of\\_child\\_care\\_centers\\_serving\\_subsidized\\_children\\_2.pdf](https://www.urban.org/sites/default/files/publication/96361/subsidy_policies_and_the_quality_of_child_care_centers_serving_subsidized_children_2.pdf).
- 59 45 C.F.R. § 98.45(f)(2)(iii), introduced 17 January 2017. Available at <https://www.ecfr.gov/current/title-45/subtitle-A/subchapter-A/part-98>.

- 60 Karen Schulman. "Precarious Progress: State Child Care Assistance Policies 2022." National Women's Law Center, May 2023. Available at <https://nwl.org/wp-content/uploads/2023/06/State-of-Child-Care-2023-FINAL.pdf>.
- 61 Bassok, Daphna, Thomas S. Dee, and Scott Latham, "The Effects of Accountability Incentives in Early Childhood Education," *Journal of Policy Analysis and Management* 38(4): 838-866, 4 June 2018. Available at <https://doi.org/10.1002/pam.22149>.
- 62 Hollett, Karen Babbs, and Erica Frankenberg, "A Critical Analysis of Racial Disparities in ECE Subsidy Funding." *Education Policy Analysis Archives*, 30(14), 8 February 2022. Available at <https://doi.org/10.14507/epaa.30.7003>.
- 63 Yiran Zhang, "Subsidizing the Childcare Economy," *Stanford Law & Policy Review*, 34: 67-130, 2023. Available at <https://law.stanford.edu/publications/subsidizing-the-childcare-economy/>.
- 64 Progressive revenue sources such as taxes raised on wealthy individuals and big corporations can support public investment in children, families, and communities, advancing racial and gender equity. See Royce, Amy, and Amy Matsui. "Taxing the Rich Will Make the Tax Code More Equitable and Support Investments in Women and Families." National Women's Law Center, April 2023. Available at [https://nwl.org/wp-content/uploads/2023/03/UPDATED-APRIL-2023\\_nwlc\\_RevenueRaisers.pdf](https://nwl.org/wp-content/uploads/2023/03/UPDATED-APRIL-2023_nwlc_RevenueRaisers.pdf).
- 65 Isaac, Julia B., Erica Greenberg, and Teresa Derrick-Mills. "Subsidy Policies and the Quality of Child Care Centers Serving Subsidized Children." Urban Institute, February 2018. Available at <https://www.urban.org/research/publication/subsidy-policies-and-quality-child-care-centers-serving-subsidized-children>.
- 66 Hollett, Karen Babbs, and Erica Frankenberg, "A Critical Analysis of Racial Disparities in ECE Subsidy Funding." *Education Policy Analysis Archives*, 30(14), 8 February 2022. Available at <https://doi.org/10.14507/epaa.30.7003>.
- 67 "Code of Federal Regulations, Part 98." Child Care Development Fund. Available at <https://www.ecfr.gov/current/title-45/subtitle-A/subchapter-A/part-98>.
- 68 Schulman, Karen. "Precarious Progress: State Child Care Assistance Policies 2022." National Women's Law Center, May 2023. Available at <https://nwl.org/wp-content/uploads/2023/06/State-of-Child-Care-2023-FINAL.pdf>.
- 69 The income verification process can also prove difficult for parents with low-wage jobs where work schedules change frequently and movement between jobs is common. In addition, some states require hours of authorized care (i.e., when and for how long a child attends care) to match their parents' actual work hours, which is especially difficult for parents with unpredictable work schedules. These policies disproportionately harm families of color. See Ullrich, Rebecca, Stephanie Schmit, Ruth Cosse. "Inequitable Access to Child Care Subsidies." Center for Law and Social Policy, April 2019. Available at [https://www.clasp.org/wp-content/uploads/2022/01/2019\\_inequitableaccess.pdf](https://www.clasp.org/wp-content/uploads/2022/01/2019_inequitableaccess.pdf).
- 70 GAO-24-106258. "Child Care: Selected States Are Taking Steps to Sustain Program Changes Implemented with COVID-19 Funding." U.S. Government Accountability Office, 4 March 2024. Available at <https://www.gao.gov/products/gao-24-106258>.
- 71 Child Care and Development Fund (CCDF) Report on States' Priorities for Child Care Services." Office of Child Care, October 2021. Available at [https://www.acf.hhs.gov/sites/default/files/documents/occ/priorities\\_report\\_fy\\_2020.pdf#:~:text=An%20estimated%201.9%20million%20children%20under%20the%20age.53.1%20million%20children%20under%20the%20age%20of%2013](https://www.acf.hhs.gov/sites/default/files/documents/occ/priorities_report_fy_2020.pdf#:~:text=An%20estimated%201.9%20million%20children%20under%20the%20age.53.1%20million%20children%20under%20the%20age%20of%2013).
- 72 Matthews, Hannah. "Immigrant Eligibility for Federal Child Care and Early Education Programs." Center for Law and Social Policy, August 2017. Available at <https://clasp.org/sites/default/files/public/resources-and-publications/publication-1/Immigrant-Eligibility-for-ECE-Programs.pdf>.
- 73 Schulman, Karen. "Precarious Progress: State Child Care Assistance Policies 2022." National Women's Law Center, May 2023. Available at <https://nwl.org/wp-content/uploads/2023/06/State-of-Child-Care-2023-FINAL.pdf>.
- 74 Adams, Gina, and Eleanor Pratt. "Assessing Child Care Subsidies through an Equity Lens." Urban Institute, September 2021. Available at <https://www.urban.org/sites/default/files/publication/104777/assessing-child-care-subsidies-through-an-equity-lens.pdf>.
- 75 Ibid.
- 76 For more concrete recommendations, see Gina Adams and Eleanor Pratt. "Assessing Child Care Subsidies through an Equity Lens: A Review of Policies and Practices in the Child Care and Development Fund." Urban Institute, September 2021. Available at <https://www.urban.org/sites/default/files/publication/104777/assessing-child-care-subsidies-through-an-equity-lens.pdf> and Wilensky, Rachel, et al. "Expanding Access to Child Care Assistance: Opportunities in the Child Care and Development Fund." Center for Law and Social Policy, June 2023. Available at [https://www.clasp.org/wp-content/uploads/2023/06/6.8.2023\\_Expanding-Access-to-Child-Care-Assistance.pdf](https://www.clasp.org/wp-content/uploads/2023/06/6.8.2023_Expanding-Access-to-Child-Care-Assistance.pdf).
- 77 Gina Adams and Eleanor Pratt. "Assessing Child Care Subsidies through an Equity Lens: A Review of Policies and Practices in the Child Care and Development Fund." Urban Institute, September 2021. Available at <https://www.urban.org/sites/default/files/publication/104777/assessing-child-care-subsidies-through-an-equity-lens.pdf>. Wilensky, Rachel, et al. "Expanding Access to Child Care Assistance: Opportunities in the Child Care and Development Fund." Center for Law and Social Policy, June 2023. Available at [https://www.clasp.org/wp-content/uploads/2023/06/6.8.2023\\_Expanding-Access-to-Child-Care-Assistance.pdf](https://www.clasp.org/wp-content/uploads/2023/06/6.8.2023_Expanding-Access-to-Child-Care-Assistance.pdf).
- 78 Pratt, Eleanor, and Heather Hahn. "What Happens When People Face Unfair Treatment or Judgment When Applying for Public Assistance or Social Services?" Urban Institute, August 2021. Available at [https://www.urban.org/sites/default/files/publication/104566/what-happens-when-people-face-unfair-treatment-or-judgment-when-applying-for-public-assistance-or-social-services\\_0.pdf](https://www.urban.org/sites/default/files/publication/104566/what-happens-when-people-face-unfair-treatment-or-judgment-when-applying-for-public-assistance-or-social-services_0.pdf).
- 79 Hirillal, Ashley, et al. "Five Steps for State and Community Leaders to Increase Equitable Access to Early Care and Education." *Child Trends*, September 2023. Available at [https://cms.childtrends.org/wp-content/uploads/1980/09/EquitableAccessCaseStudies\\_ChildTrends\\_Sept2023.pdf](https://cms.childtrends.org/wp-content/uploads/1980/09/EquitableAccessCaseStudies_ChildTrends_Sept2023.pdf).
- 80 In this brief, we refer to "child care providers" as those running center-based or home-based child care programs. This section specifically focuses on the early care and education staff who are typically called "childcare workers." We refer to them as "early childhood educators" to differentiate from "child care providers" (although the two groups overlap).
- 81 Mefferd, Eve, and Dawn Dow. "The US Child Care System Relies on Women of Color, but Structural Barriers Systematically Disadvantage Them." Urban Institute, 14 June 2023. Available at <https://www.urban.org/urban-wire/us-child-care-system-relies-women-color-structural-barriers-systematically-disadvantage>.
- 82 Full-time, year-round work is defined by the BLS as 2,080 hours per year. See "Occupational Employment and Wage Statistics." U.S. Bureau of Labor Statistics, May 2022. Available at <https://www.bls.gov/oes/current/oes399011.htm#nat>.
- 83 "Family, Friend, and Neighbor Care." National Women's Law Center, March 2018. Available at <https://nwl.org/wp-content/uploads/2018/03/family-friend-neighbor-care-fact-sheet-final.pdf>. "Child Care Providers Face Housing Challenges." Stanford University Center on Early Childhood, March 2023. Available at [https://static1.squarespace.com/static/5e7cf2f62c45da32f3c6065e/t/64075f6801451c180f48becf/1678204776265/housing\\_challenges\\_factsheet\\_mar2023.pdf](https://static1.squarespace.com/static/5e7cf2f62c45da32f3c6065e/t/64075f6801451c180f48becf/1678204776265/housing_challenges_factsheet_mar2023.pdf).
- 84 Khattar, Rose, and Maureen Coffey. "The Child Care Sector is Still Struggling to Hire Workers." Center for American Progress, 19 October 2023. Available at <https://www.americanprogress.org/article/the-child-care-sector-is-still-struggling-to-hire-workers/>.
- 85 Grunewald, Rob, Ryan Nunn, and Vanessa Palmer. "Examining Teacher Turnover in Early Care and Education." Federal Reserve Bank of Minneapolis. Available at <https://www.minneapolisfed.org/article/2022/examining-teacher-turnover-in-early-care-and-education>.
- 86 "A Vision for Financing Early Care and Education." New America. Available at <https://www.newamerica.org/education-policy/reports/transforming-financing-a-vision-for-financing-early-care-and-education/>.
- 87 Wolfe, Julia, et al. "Domestic Workers Chartbook." Economic Policy Institute, May 2020. Available at <https://files.epi.org/pdf/194214.pdf>.
- 88 "Addressing the Decreasing Number of Family Child Care Providers in the United States." National Center on Early Childhood Quality Assurance, October 2019. Available at [https://childcareta.acf.hhs.gov/sites/default/files/addressing\\_decreasing\\_fcc\\_providers\\_revised\\_final.pdf](https://childcareta.acf.hhs.gov/sites/default/files/addressing_decreasing_fcc_providers_revised_final.pdf).

- 89 “Addressing the Decreasing Number of Family Child Care Providers in the United States.” National Center on Early Childhood Quality Assurance, October 2019. Available at [https://childcareta.acf.hhs.gov/sites/default/files/addressing\\_decreasing\\_fcc\\_providers\\_revised\\_final.pdf](https://childcareta.acf.hhs.gov/sites/default/files/addressing_decreasing_fcc_providers_revised_final.pdf).
- 90 Ibid.
- 91 Schochet, Leila. “The Child Care Crisis Is Keeping Women Out of the Workforce.” Center for American Progress, 28 March 2019. Available at <https://www.americanprogress.org/article/child-care-crisis-keeping-women-workforce/>.
- 92 Ferrette, Tiffany, Alycia Hardy, and Alyssa Fortner. “Centering Black Families: Equitable Discipline Through Improved Data Policies in Child Care.” Center for Law and Social Policy, February 2023. Available at [https://www.clasp.org/wp-content/uploads/2023/02/2.28.2023\\_Centering-Black-Families-Equitable-Discipline-through-Improved-Data-Policies-in-Child-Care.pdf](https://www.clasp.org/wp-content/uploads/2023/02/2.28.2023_Centering-Black-Families-Equitable-Discipline-through-Improved-Data-Policies-in-Child-Care.pdf).
- 93 Allen Rosemarie, et al. “A Holistic Approach to Ending Exclusionary Discipline for Young Learners.” Children’s Equity Project, September 2022. Available at <https://cep.asu.edu/sites/default/files/2022-09/exclusionary-discipline-093022-1.pdf>.
- 94 Schilder, Diane, and Heather Sandstrom. “How Supporting Early Care and Education Supports a Stronger Economy.” Urban Institute, 14 May 2021. Available at <https://www.urban.org/urban-wire/how-supporting-early-care-and-education-supports-stronger-economy>.
- 95 “Improving Child Care Access, Affordability, and Stability, in the Child Care and Development Fund (CCDF).” Federal Register, 13 July 2023. Available at <https://www.federalregister.gov/documents/2023/07/13/2023-14290/improving-child-care-access-affordability-and-stability-in-the-child-care-and-development-fund-ccdf>.
- 96 “Home-Based Child Caregivers Provide More than the Essentials for Parents Who Don’t Work 9 – 5.” Home Grown, 11 January 2022. Available at <https://homegrownchildcare.org/home-based-caregivers-provide-more-than-the-essentials-for-parents-who-dont-work-9-5/>.
- 97 Ibid.
- 98 Lally, J.R. “The Impact of Child Care Policies and Practices on Infant/toddler Identity Formation.” *Young Children*, 51(1): 58-67, 1995. Available at <https://eric.ed.gov/?id=EJ513982>.
- 99 Wilensky, Rachel, et. al. “Expanding Access to Child Care Assistance: Opportunities in the Child Care and Development Fund.” Center for Law and Social Policy, June 2023. Available at [https://www.clasp.org/wp-content/uploads/2023/06/6.8.2023\\_Expanding-Access-to-Child-Care-Assistance.pdf](https://www.clasp.org/wp-content/uploads/2023/06/6.8.2023_Expanding-Access-to-Child-Care-Assistance.pdf).
- 100 Mefferd, Eve, and Dawn Dow. “The US Child Care System Relies on Women of Color, but Structural Barriers Systematically Disadvantage Them.” Urban Institute, 14 June 2023. Available at <https://www.urban.org/urban-wire/us-child-care-system-relies-women-color-structural-barriers-systematically-disadvantage>.
- 101 Ewen, Danielle, Lauren Hogan, and Christine Johnson-Staub. “How States Can Spend \$10 Billion for Child Care Well, Wisely & With Urgency.” National Association for the Education of Young Children, 27 January 2021. Available at [https://www.clasp.org/sites/default/files/publications/2021/01/policy\\_10billion\\_for\\_ccdbg.pdf](https://www.clasp.org/sites/default/files/publications/2021/01/policy_10billion_for_ccdbg.pdf).