



Date: October 25, 2023

To: Lydia B. Taghavi
Chief Data Officer
Office of Policy Development and Research
U.S. Department of Housing and Urban Development (HUD)

Attn: Anna Guido, Clearance Officer, REE, HUD

From: Local Initiatives Support Corporation (LISC)
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Re: 88 FR 65737
Notice of Proposed Information Collection (NPIC): Study of Child Care in Public Housing: PHA and ECE Center Interviews Data Collection, OMB Control No.: 2528

Local Initiatives Support Corporation (LISC) appreciates the opportunity to submit written comments on the Notice of Proposed Information Collection: Study of Child Care in Public Housing: Public Housing Authority (PHA) and Early Care and Education (ECE) Center Interviews Data Collection (88 FR 65737). Safe, affordable homes and equitable access to quality child care and early learning are essential to the health and well-being of children and families, and are the foundation for sustainable, economically vibrant and diverse neighborhoods.

Unfortunately, access to developmentally appropriate home and center-based child care facilities is often a significant obstacle to making quality care available and accessible.ⁱ LISC is encouraged that HUD is taking steps to better understand the ECE needs, preferences, and use of families in PHA-owned housing in order to better understand the factors that facilitate and/or obstruct co-locating PHA and ECE programs. We offer the following feedback based upon our experience with funding, coordinating, and supporting “co-location models” that seek to push the boundaries of ways that child care space has historically been thought of and developed, and our experience in providing direct facilities financing, technical assistance, and capacity building services to child care providers, states, and localities.

About LISC

Established in 1979, LISC is a non-profit and community development financial institution (CDFI) committed to forging resilient and inclusive communities of opportunity across America – great places to live, work, visit, do business and raise families. With offices in 38 cities throughout the country, and a rural network encompassing more than 140 partners across 49 different states, LISC's work supports a wide range of activities, including affordable housing, economic development, family income and wealth building, child care and early learning, community safety and justice, and community health. In 2022,

LISC invested approximately \$2.8 billion in local communities, which leveraged an additional \$7.2 billion. Through our signature Child Care & Early Learning Program, we have invested more than \$125 million in developing or improving more than 782 facilities serving 30,000 children annually in urban and rural neighborhoods across the country. That investment has leveraged an additional \$518 million in public and private resources for these early learning spaces.

LISC Feedback Re:

(1) Whether the proposed collection of information is necessary for the proper performance of the functions of the agency, including whether the information will have practical utility

Demand for Quality ECE Programs

Communities across the country have limited access to quality child care, with historically disinvested low-income communities, communities of color, and rural areas disproportionately affected. During the height of the COVID-19 pandemic, 63 percent of child care centers and 27 percent of family child care (FCC) homes shut their doors, and by 2021 an estimated 16,000 child care centers and licensed FCC programs had closed permanently.ⁱⁱ As we continue to recover from the pandemic, equitable access to quality child care and early learning has never been more essential to the health and economic vitality of families, communities and the nation.

Space Matters

Physical spaces play an important role in child care and early learning; the quality of buildings and indoor and outdoor spaces profoundly impacts child development, and directly influences program quality and the health and well-being of children and staff.ⁱⁱⁱ Despite what is known about the importance of ECE facilities, there is no dedicated, stand-alone federal funding to support their acquisition, construction, and/or renovation, and there are no comprehensive national data on their condition, quality and availability.^{iv}

PHA Role/ Practical Utility

High quality ECE programs are essential to healthy child development and provide working families with better job stability and overall economic security.^v Across the nation, there is need for more equitable access to affordable child care and early learning options, offered in facilities that support health, safety, growth and development. To our knowledge, there has been limited federal data collection the intersection between public housing supports and ECE, and we are unaware of any recent data on leveraging spaces in PHA developments to help meet the physical infrastructure needs of child care and early learning programs. Building a resilient ECE system requires exploration of how existing supports for low- and moderate-income individuals can be leveraged to develop space to meet a wide array of family and community needs.

Public housing provides a lifeline for low-income families that are unable to find or afford private market housing; many PHAs are a resource for low-income households, linking residents to important resources and services that they need.^{vi} PHAs and PHA-owned developments are well positioned to help support the healthy development of children, and the economic stability of PHA residents and the surrounding community by addressing a huge impediment – accessing safe, affordable, quality child care and early education programs in appropriate spaces. The data collected on the needs, preferences, and use of families in PHA-owned housing, and opportunities and challenges to co-location of PHA developments

and ECE programs have the potential to inform strategies to address the physical infrastructure needs of ECE programs and community access to high quality child care and early learning.

LISC Feedback re:

(3) Ways to enhance the quality, utility, and clarity of the information to be collected

Stakeholder Interviews

Often, ECE stakeholder landscape analyses have a blind spot for challenges that ECE providers face when attempting finance, design, and develop and indoor and outdoor spaces, and opportunities to leverage multi-sector resources to build out ECE facilities. LISC encourages you to include community development financial institutions (CDFIs) and intermediaries with experience in planning, developing, and financing high quality ECE facilities and business models in your stakeholder interviews. While not all communities have a CDFI with an explicit ECE focus, local CDFIs may interface with the child care sector in their geographies in a multitude of ways— through lending opportunities, local stakeholder engagement, targeted technical assistance and capacity building, small business supports, economic development strategies, and the design and implementation of plans for physical spaces.^{vii}

Topic #6: Proximity of ECE programs to PHA (e.g., whether the program is in a child care desert or location with many options available)

The issue of proximity of ECE programs to PHA developments is an important one, and LISC fully supports this line of information collection. We do, however, want to highlight the distinction between program accessibility, availability, and affordability – factors that influence the ability of families to connect with care. While the absence of proximate ECE programs may signal a lack of care options, the presence of an ECE program doesn't necessarily indicate that care is available, accessible, or affordable. For example, there may be ECE programs relatively close to a PHA development, but if those programs are at maximum enrollment capacity, care may not be available to families seeking to newly enroll their child. Similarly, a program in close proximity may have openings for enrollment but may be too costly for some families. We encourage you to ask questions that take proximity, accessibility, availability, and affordability into consideration if the data is going to be used to determine care options that are truly available to families.

Facilities Questions

There are no comprehensive national data on the condition, quality, and availability of ECE facilities. Utilizing existing data collection activities to ask pertinent questions about physical spaces can help fill important gaps in information. We recommend including questions about the condition and quality/performance of ECE indoor and outdoor spaces for ECE co-located with PHAs and for local ECE programs, and questions about whether ECE providers have access technical assistance or other supports related to facility design, facility best practices, and equipment and infrastructure financing.

Below are several examples of suggested/sample questions:

- Does your ECE program currently have facility needs?
 - Yes
 - No
- If yes, are the facilities needs related to:

- Quality (ex: Bathrooms adjacent to classrooms, accessible cubbies, and child-sized sinks, counters, furnishings and fixtures)
- Capacity (Do you need more space to serve a waiting list for additional children?)
- Auxiliary Spaces for Teaching Staff (teacher preparation/ resource storage space, teacher lounge, adult-sized toilet facilities)
- Health & Safety (ex: Lead paint, mold, electrical upgrades, ventilation, access to water / sinks for sanitation, etc.)
- All of the Above
- What type of improvement is needed?
 - More Space
 - Upgraded Space
 - Repairs
 - Playground Renovation
 - Other
- Can you estimate the total capital costs of addressing these needs?
 - Yes
 - No
- If yes, what is the estimated cost, and how did you arrive at that number?
- Do you have access to an entity that is able to provide financing, technical assistance and/or capacity building support for your facilities needs?

Resident Interviews

Creating a data collection environment that is sensitive to the preferences of families and participants is a cornerstone of authentic community engagement. We fully endorse the approach of collecting information from PHA residents in individual interviews, and recommend that you include questions about: whether they have expectations about the condition and quality of the indoor and outdoor spaces where ECE is provided; how the condition and quality of space factors into their care decisions; and what types of improvements (if any) they would like to see in ECE physical spaces.

Home Based ECE

Home-based child care providers are fundamental to our nation's child care and early learning infrastructure. Oftentimes, family child care (FCC) providers or family, friend, and neighbor (FFN) caregivers are the most accessible, approachable, and affordable child care option available. It's no surprise many parents prefer the familiarity, flexibility, and friendliness that home-based child care offers.^{viii}

The challenges that FCC and FFN caregivers face with respect to operating in quality, affordable housing are significant. We have heard anecdotal reports that FCC and FFN providers who are public housing residents feel that they need to operate clandestinely and have a significant fear of eviction or losing their public housing eligibility. Lack of clarity about the ability to operate FCC or FFN in public housing undermines the ability of providers to seek different forms of assistance to meet the needs of families and to improve the services that they offer.

In the past, HUD has explored the intersection of home based ECE and public housing. Efforts like the Public Housing Child Care Demonstration Program ("Demonstration") created under Section 117 of the Housing and Community Development Act of 1987 supported the remodel of residential units or

community centers within public housing developments to support child care. Sponsoring agencies used grant funds primarily for renovation, equipment and supplies, and staffing.^{ix} We believe that there is tremendous need for similar approaches to supporting FCC and FFN now.

We inferred from title of this information collection that the focus of this particular data collection effort is on PHA and ECE Centers. We encourage you to expand your collection activities to include perspectives on co-location of FCC and FFN care.

Conclusion

Quality child care and early learning programs are essential for healthy children and families, and for robust local economies – now and in the future. In the fields of early childhood facility policy, financing, and practice, LISC has been an advocate, thought leader and resource for more than two decades. We are not attempting to fix every piece of the complex ECE puzzle, but we are uniquely positioned to help place an essential piece of that puzzle: developing and financing quality physical spaces and building the capacity of ECE providers. These actions are essential to building a robust quality child care and early learning system and thriving local communities. We are eager to use our experience to promote systems-level change and be a resource to the Department. Please do not hesitate to contact Bevin Parker-Cerkez, LISC National Director of Child Care and Early Learning (bparkercerkez@lisc.org) or Nicole Barcliff, LISC Sr. Policy Director (nbarcliff@lisc.org) if we can be a resource to you on these issues.

ⁱ i Treder, J. (2021, February 6). Childcare deserts in rural Minnesota. Northland Access to Justice.

<https://www.northlandproject.org/childcaredeserts>.

Bipartisan Policy Center. (2018). Early Learning Facilities Policy Framework.

<https://bipartisanpolicy.org/download/?file=/wp-content/uploads/2019/06/Early-Childhood-Early-LearningFacilities-Policy-Framework.pdf>.

ⁱⁱ Lin, Y.; McDoniel, M. (2023). *Understanding child care and early education program closures and enrollment during the first year of the COVID-19 pandemic*. OPRE Report #2023-237. Office of Planning, Research, and Evaluation, Administration for Children and Families, U.S. Department of Health and Human Services.

<https://www.acf.hhs.gov/sites/default/files/documents/opre/2023-237%20COVID%20Highlight.pdf>

Child Care Aware of America. (2023). *Demanding Change, Repairing our Child Care System*.

[https://info.childcareaware.org/hubfs/2022-03-FallReport-FINAL%20\(1\).pdf?utm_campaign=Budget%20Reconciliation%20Fall%202021&utm_source=website&utm_content=22_demandingchange_pdf_update332022](https://info.childcareaware.org/hubfs/2022-03-FallReport-FINAL%20(1).pdf?utm_campaign=Budget%20Reconciliation%20Fall%202021&utm_source=website&utm_content=22_demandingchange_pdf_update332022)

ⁱⁱⁱ Sussman, C.; Gillman, A. (2007). *Building Early Childhood Facilities: What States Can Do to Create Supply and Promote Quality*. https://www.lisc.org/media/filer_public/14/1e/141eb5aa-b07e-48bf-b1de-d1ef558330b4/2007_nieer_cick_facilities_brief.pdf

^{iv} With the exception of Tribal Nations, Child Care Development Block Grant resources cannot be used to support the acquisition, construction, or major renovation of child care facilities. The demand for Head Start facilities funding outstrips available resources.

https://www.acf.hhs.gov/sites/default/files/documents/occ/ccdf_acf_pi_2020_02.pdf

<https://childcareta.acf.hhs.gov/construction-and-major-renovation>

<https://nhsa.org/wp-content/uploads/2022/03/2021-Facility-Infrastructure-Brief.pdf>

^v First Five Years Fund. *Why It Matters: Support For Working Families*. <https://www.ffyf.org/why-it-matters/support-working-families/>

^{vi} https://www.hud.gov/topics/rental_assistance/phprog

^{vii} Child Care Aware of America; Local Initiatives Support Corporation (LISC). (2021). *Capitalizing on the Capabilities of Child Care Resource and Referral Agencies & Community Development Financial Institutions to Stabilize and*

Increase the Supply of High-quality Child Care. <https://info.childcareaware.org/hubfs/2021-CCRR%20and%20CDFI%20Intermediaries%20PaperFINAL-1.pdf>

^{viii} Patterson, A. (2023, September 12). *Parents Choose Quality When They Use Family, Friend and Neighbor Care.* <https://homegrownchildcare.org/parents-choose-quality-when-they-use-family-friend-and-neighbor-care/>

^{ix} Sextant Consultants, Inc. (1992, April). *Public Housing Child Care Demonstration Program: Program Assessment: First Round.* Office of Policy Development and Research U.S. Department of Housing and Urban Development. <https://www.huduser.gov/portal/Publications/pdf/HUD%20-%205999.pdf>