



CHILD CARE AND DEVELOPMENT FUND EQUITY ASSESSMENT

TOOLKIT

Child Care and Development Fund Equity Assessment Toolkit

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Table of Contents

CCDF Equity Assessment Toolkit.....	1
Introduction to the CCDF Equity Assessment Toolkit: Why do we need the Toolkit and how can it help?	2
What’s included in this Toolkit?	5
How T/TA Planners & Facilitators Can Use the Information in this Toolkit	6
Section 1: Learning.....	7
Section 2: Guide to key CCDF system factors for advancing equity	18
Section 3: Introduction to Equity Impact Assessments and Key Existing Resources.....	32
Section 4: T/TA Equity Assessment Planning Facilitation Tool for Use with CCDF Lead Agencies....	40
Section 5. CCDF Equity Assessment “Starter Kit”	42
References	58
Appendix.....	62
Key Resources to Support Racial Equity Impact Assessments of Federal CCDF Policies	62

CCDF Equity Assessment Toolkit

The purpose of the Child Care and Development Fund (CCDF) program is to help families with low incomes gain access to high-quality child care so adults can work and their children can be supported to reach their full potential (CCDF Program Final Rule, 2016).

Despite this aim there remain groups of children and families in the U.S. who are systematically left behind, as evidenced by persistent gaps in child development, school readiness and family economic security.

These gaps are a result of differences in the opportunities that children and families get, not the result of differences between people, and they provide a signal that our systems and policies can do more to ensure that families have fair and consistent—**equitable**—access to high-quality affordable child care and early education opportunities. More equitable access to affordable high-quality child care for working families with low incomes in turn can promote more equitable child development and family economic outcomes.

Motivated by the Executive Order on Advancing Racial Equity (Exec. Order No. [13985](#), 2021) and the Administration for Children and Families Office of Child Care’s (OCC) commitment to equity, OCC recognizes that an important step in advancing greater equity through CCDF systems is to provide Lead Agencies with the guidance and supports they need to proactively **assess** whether and how their current CCDF policies and practices could do more to advance equity.

Training and technical assistance (T/TA) providers in the Child Care Technical Assistance Network (CCTAN) can help State, Territory, and Tribal CCDF Lead Agencies take steps towards conducting equity assessments to inform policy design, planning, implementation, and monitoring.

T/TA providers can support CCDF Lead Agencies by:

- ▶ Providing Lead Agencies with a common roadmap for thinking about how CCDF systems can advance equitable child and family outcomes (i.e., a shared “theory of change”).
- ▶ Increasing Lead Agency knowledge about how key CCDF system factors or “policy levers” can advance (or hinder) equity. CCDF policy levers are the specific tools that Lead Agencies can use to direct resources, manage, and shape changes to their CCDF systems.
- ▶ Ensuring Lead Agencies are informed about the range of methods available for equity impact assessments and policy equity assessments.
- ▶ Facilitating discussions with CCDF Lead Agencies to support planning for and taking steps towards equity assessments.

EQUITY means that with fair and just treatment to all, children, families and those who support them have opportunities to reach their full potential.

Equity promotes consistent, systemic, and equitable access to comprehensive services and systems for:

African American, Black, Latino, Hispanic, Indigenous, American Indian Alaskan Native, Asian Americans and Pacific Islanders and other persons of color; members of religious minorities; LGBTQ+ persons; persons with disabilities; persons who live in rural areas; and persons otherwise adversely affected by persistent poverty or inequality.

-Consensus definition of the Equity, Inclusion & Culturally and Linguistically Responsive Practice (EI&CLRP) workgroup (September, 2021)

The purpose of the Toolkit is to equip training and technical assistance providers with the starter resources and tools needed to support CCDF Lead Agencies as they consider and plan for CCDF equity assessments.

Introduction to the CCDF Equity Assessment Toolkit: Why do we need the Toolkit and how can it help?



Photo credit: Edutopia, David Grossman / Alamy

Inequities are formidable...

In 2018—the most recent year for which data are available—more than 1 in 3 young children in the U.S. were eligible for CCDF child care assistance and not getting it (Exhibit 5.2.1). That means that one-third of our 35 million young children ages 0-9 (and their families) were denied access to an important public support for a vital set of services for their safety and development and for their parents' ability to work and thrive. And worse, roughly half of U.S. Black and Hispanic young children lacked access to CCDF assistance, a rate twice that of White and Asian young children in the U.S. (See Exhibit 5.2.1 in Section 5).

While current CCDF systems are working full tilt to facilitate access to quality child care for vulnerable children across the U.S., these large and persistent inequities require that we ask how CCDF systems can do more to advance equity.

The Child Care and Development Fund plays a crucial role in facilitating access to high quality child care and early education for children ages 0-12, particularly for children who belong to underserved communities and groups that have historically been denied fair access to basic opportunities. This includes: African American, Black, Latino, Hispanic, Indigenous, American Indian Alaskan Native, Asian Americans and Pacific Islanders and other persons of color; members of religious minorities; LGBTQ+ persons; persons with disabilities; persons who live in rural areas; and persons otherwise adversely affected by persistent poverty or inequality. As the largest public federal child care assistance support for historically underserved children and families, CCDF, by definition, has a crucial role to play in advancing equitable access to high quality child care in the U.S.

...Yet, CCDF Lead Agencies can make progress even within existing constraints. Equity assessments can help.

Progress can be made to reduce persistent inequities, both within the existing constraints and resources of current CCDF systems, and also as resources and systems expand over time.

Equity assessments are a foundational tool and a first step to supporting informed goal setting, planning, and prioritization of actions for advancing greater equity. Equity assessments can help to identify the groups of children and families facing increased barriers so that access for these groups can be prioritize

made more equitable (i.e., consistent and free from unfair barriers). These assessments can also help prioritize the CCDF policy levers and approaches that may have the greatest potential for impact.

As part of the work of disrupting and breaking cycles of persistent inequity in the U.S., CCDF Lead Agencies—along with other federally-supported human services agencies—are increasingly required to evaluate and demonstrate that their policies and practices are proactively advancing equity for underserved children and families (Exec. Order on Advancing Racial Equity No. [13985](#), 2021). OCC is committed to supporting CCDF Lead Agencies to conduct equity assessments that can help: (i) identify policies and practices that could do more to advance greater equity for underserved groups, (ii) ensure that current policies and practices do not inadvertently contribute to or perpetuate inequitable outcomes, and (iii) provide valuable insights about the limitations of current CCDF systems for advancing equity.



CCDF equity assessments help us (systematically) understand:

- ✓ where we are and how far we have to go to achieve greater equity for U.S. families
- ✓ specific ways that CCDF policies/practices can do more to advance greater equity

Photo credit: Unknown.

To make progress, CCDF Lead Agencies need support from T/TA providers, who in turn would benefit from tools designed for them→ This Toolkit is designed to support T/TA providers

The development of this Toolkit started with a scan and review of existing equity assessment tools and resources (See Section 3 and the Appendix for more information about the scan and review). While there are many valuable resources to build from, there is no “go-to” or “one-stop” reference tool to guide and support this work among CCDF Lead Agencies. This Toolkit is designed to address this gap in existing equity assessment tools and to equip T/TA providers with CCDF-focused resources.

There are two major gaps in existing equity assessment tools that this Toolkit aims to address:

First, there is a pressing need for a shared roadmap—or “theory of change”—to guide how administrators, policymakers, T/TA providers, and others discuss and examine key CCDF system factors that contribute to equity or present barriers to equity. A theory of change includes key factors that contribute to equity or present barriers to equity and would be important to measure at Federal, State/Territory/Tribal Area, and local levels within the CCDF system, providing a framework to support CCDF Lead Agencies in making and tracking progress. A shared roadmap is foundational to building a systematic and consistent approach to assessing issues of equity across CCDF systems, and for working together towards shared goals, planning, and monitoring over time.

CCDF Lead Agencies and T/TA providers currently lack a common roadmap, leaving them to develop or seek out their own individual approaches. The theory of change in the Toolkit (See Section 1) was designed to begin to fill this current gap in resources for T/TA providers and the CCDF Lead Agencies they support. It aims to provide an initial starting point that will evolve over time as T/TA providers and Lead Agencies work with it and come to identify ways to further tailor and refine it to meet their needs.

Second, in addition to a “theory of change”, CCDF Lead Agencies also need resources and tools to help them move from learning and knowledge-building to planning and action.

Exhibit I.1. Steps toward conducting CCDF equity assessments

1	Theory of change	CCDF Lead Agency stakeholders have a shared theory of change about how CCDF systems can advance equity for children and families
2	CCDF policy levers	CCDF Lead Agency decision-makers have knowledge of how key CCDF policy levers in their system may impact equity
3	Equity assessment methods	CCDF Lead Agency decision-makers are familiar with a range of race equity impact assessment and policy equity assessment approaches along a continuum
4	Assessment focus, priorities, & starting point	CCDF Lead Agency has identified priorities for assessment related to key equity goals, and determined desired focus, scope and starting point for assessment
5	Capacity assessment	CCDF Lead Agency has evaluated its own capacity (staff, data systems, analytics) for conducting an equity assessment
6	CCDF equity assessment plan	CCDF Lead Agency has selected priority areas, assessment methods, activities and approaches, and outlined resources and capacity that will be used to conduct the assessment

Designing and conducting equity assessments requires a multi-step process that begins with the **foundational learning steps (Exhibit I.1, Steps 1 and 2)** of developing a shared theory of change and gaining a detailed understanding of how specific CCDF system factors (i.e. CCDF policy levers) relate to equity. From there, to move from knowledge to action, CCDF Lead Agencies need to **become familiar with the menu of equity assessment approaches and activities that can help them study their systems (Exhibit I.1, Step 3)**. Equipped with foundational knowledge of equity issues and the role of specific CCDF policy levers *plus* familiarity with existing tools and approaches for equity assessment, CCDF Lead Agencies are better equipped to take **planning steps towards designing and conducting equity assessments (Exhibit I.1, Steps 4, 5 and 6)**.

Planning and start-up activities include: (i) determining the focus and starting point for equity assessment efforts, (ii) identifying the most relevant and effective equity assessment methods and activities based on the focus of the assessment (and that are doable within the Lead Agency's capacity), and (iii) formalizing these decisions in a CCDF equity assessment plan to guide the work of the assessment.

The overarching goal of this Toolkit is to provide a centralized set of starter resources and tools for T/TA providers to support CCDF Lead Agencies wherever they are on the knowledge-to-action continuum. This Toolkit aims to equip T/TA providers with a range of resources to support Lead Agencies wherever they are in their process of conducting CCDF equity assessments, understanding that Lead Agencies will be in different starting places, and will require support in different stages of the process of planning, designing, and conducting CCDF equity assessments.

What's included in this Toolkit?

This Toolkit contains five resources for T/TA providers. Each of these resources can be used individually or in combination as needed.



Equity Learning Resources:

1

Learning: Section 1 provides a definition of equity and related key concepts, and includes an overarching theory of change about how CCDF systems can advance equitable outcomes in children's development and family economic security.

2

Guide to key CCDF system factors for advancing equity: Section 2 describes the key CCDF system factors (i.e., CCDF policy levers) identified in the theory of change, explaining how each factor, or policy lever, can increase (or unintentionally hinder) equity.



Introduction to Equity Assessments and Key Resources:

3

Introduction to equity impact assessments and key existing resources: Section 3 describes the purpose, scope, and activities of equity assessments. It also describes six key existing resources that describe a range of methods, approaches, and activities that CCDF Lead Agencies can undertake to conduct different types of CCDF equity assessments.



Hands-on Resources to Get Started with CCDF Equity Assessments:

4

T/TA Equity Assessment Planning Facilitation Tool: Section 4 provides a resource designed to help T/TA providers support CCDF Lead Agencies in: (i) assessing where they are in the knowledge-to-action continuum of steps towards conducting CCDF equity assessments, and then (ii) working to identify different T/TA activities (supported by different resources in the Toolkit) that will help Lead Agencies make progress towards conducting CCDF equity assessments, depending on where they are on the continuum.

5

CCDF Equity Assessment "Starter Kit": Section 5 is designed to equip T/TA providers with hands-on resources for working with Lead Agencies as they progress into the planning and action stages of conducting equity assessments. This section includes a **decision roadmap** to help T/TA providers work with Lead Agencies to identify the focus, scope and starting point for CCDF equity assessment activities; **plus three accompanying "starter" tools** designed to help T/TA providers support Lead Agencies with various start-up activities depending on where and how a Lead Agency chooses to start.

How T/TA Planners & Facilitators Can Use the Information in this Toolkit

The CCDF Equity Assessment Toolkit is designed to equip T/TA providers with a range of tools and resources to support CCDF Lead Agencies in 1) learning more about how CCDF policies and practices relate to equitable outcomes, and about specific key CCDF system factors that can advance equity, 2) learning about methods and approaches for conducting assessments to identify factors that could advance equity, and 3) taking concrete steps towards implementing equity assessments, understanding that Lead Agencies are at different starting points, have different types and levels of capacity, and face different policy contexts and political conditions.

As described in more detail in Sections 4 and 5, T/TA Planners and Facilitators can use the resources in this Toolkit to support the following types of actions:

1. Develop and facilitate peer learning opportunities with CCDF Lead Agencies that support:
 - Shared learning experiences about how CCDF policies and practices relate to equitable outcomes for children and families (using the content in Section 1), and how specific CCDF system factors (i.e., CCDF policy levers) contribute (using Section 2),
 - Access to information about the range of methods and approaches that can be used to conduct CCDF equity assessments (using Section 3), and
 - Over the longer term (once Lead Agencies have applied the resources in the Toolkit): Peer learning sessions to share experiences and lessons with equity assessment-related activities and needs and challenges, including discussion of how Lead Agencies used resources in the Toolkit to make progress and what additional tools and supports they need.
2. Use the T/TA Equity Assessment Planning Facilitation Tool (Section 4) to support CCDF Lead Agencies take steps towards conducting equity assessments. T/TA providers can use the resources in the Toolkit to support Lead Agencies in several ways, including, for example:
 - Helping CCDF system leaders build consensus around a shared theory of change about how CCDF systems advance equity,
 - Supporting Lead Agencies as they work to identify key priority issues, outcome areas, and/or specific CCDF policy levers for equity assessment,
 - Providing guidance for Lead Agencies about the different equity assessment approaches, methods, and activities available, and identifying the assessment methods that best advance their goals, and
 - Assisting Lead Agencies as they evaluate the internal and external capacity and resources needed to undertake different equity assessment activities to meet their goals.
3. Encourage use of the various “starter” tools in the CCDF Equity Assessment Starter Toolkit (Section 5) with CCDF Lead Agencies.

One important tip for using this toolkit is that each of the five resources (i.e., sections) is designed to be used either independently, in combination, or as a full set, depending on CCDF Lead Agency needs. In addition, there is not set sequence or approach to doing this work with Lead Agencies. Each Lead Agency will be starting from a unique place regarding their knowledge of and readiness for implementing equity assessments. As such, it may be useful for T/TA providers to read through this entire document and then, based on their knowledge of each Lead Agency, select the most appropriate place to start.

Section 1: Learning

Purpose

There are two main purposes of the Section 1 Learning Resource.

The first purpose is to convey the overarching ‘equity’ goals that guide the work of OCC more broadly, since this is the set of end policy goals that CCDF systems are designed to advance. This provides a shared foundation for considering issues of equity in CCDF systems. These goals are grounded in the consensus definition of equity developed by the Equity, Inclusiveness, & Culturally and Linguistically Responsive Practices (EI&CLRP) Workgroup of the Early Childhood Training & Technical Assistance System and described below. The Toolkit uses this definition as a foundation for building a shared vocabulary and set of concepts for understanding and addressing equity through CCDF policies and practices.

The second purpose of this learning resource is to outline a **theory of change** that creates a framework for examining how key CCDF system factors, policies, and practices could do more to advance equity (or in some instances even inadvertently and unknowingly contribute to *inequities*). In order to assess how CCDF systems can advance equitable child development and family economic security, OCC, T/TA providers and CCDF Lead Agencies first need a common “theory of change” to support understanding of the factors both *outside* the system (that shape inequities for families), and factors *inside* the system that can address and overcome these inequities. Although factors inside the system are the ones that CCDF Lead Agencies have the ability to change and refine, and thus represent the focus of this document, it is also important to recognize that families’ interactions with the subsidy system are affected by factors beyond the control of either families or Lead Agencies.

Purpose 1: Defining Equity

The Equity, Inclusiveness, and Culturally and Linguistically Responsive Practices (EI&CLRP) Workgroup of the Early Childhood Training and Technical Assistance System developed a consensus definition of equity as follows:

EQUITY means that with fair and just treatment to all, children, families and those who support them have opportunities to reach their full potential.

Equity promotes consistent, systemic, and equitable access to comprehensive services and systems for:

African American, Black, Latino, Hispanic, Indigenous, American Indian Alaskan Native, Asian Americans and Pacific Islanders and other persons of color; members of religious minorities; LGBTQ+ persons; persons with disabilities; persons who live in rural areas; and persons otherwise adversely affected by persistent poverty or inequality.

Equity means ensuring:

Anti-bias nurturing settings

Resources to help every child reach highest potential

Program level protective and promotive supports

Commitment & voice to historically marginalized groups

--Consensus definition of the Equity, Inclusiveness, & Culturally and Linguistically Responsive Practices (EI&CLRP) workgroup (September 2021)

Following from this definition, equity will be achieved when children and families in the historically underserved groups named have consistent, systematic, and equitable access to comprehensive services and systems, including affordable high-quality child care and early education.

Therefore, the ultimate measure of whether equity has been achieved is the *absence* of systemic unfair and avoidable differences between population groups in opportunities for children ages 0-12 to access affordable high-quality child care and early education, including early care, early education, and school-age care.

The theory of change that is guided by this definition of equity considers how CCDF systems can play a role in bringing children and families from a place of inequity—where there are large differences between racial, ethnic and other identity groups in their levels of access to affordable high-quality child care—to a place of greater equity—where children and families across *all* groups have consistent and fair access, and where CCDF policies and practices are proactively prioritizing the needs of children and families from historically underserved and marginalized groups as a critical step to increasing equity.

Purpose 2: A Theory of Change

Assessments of any kind require a framework that outlines what is being assessed, and a rubric that indicates what factors to examine and look for. Consider other types of assessments, like early childhood developmental assessments designed to examine different aspects of a child's functioning. Child developmental assessments use common frameworks, approaches, and measures/indicators to assess children's social skills, cognition, or communication skills.

Similarly, in order to conduct equity assessments of CCDF systems a shared framework or "theory of change" is required to guide how to examine the functioning of CCDF systems, and how the functioning of different aspects of the system impacts equity. To serve as a conceptual framework that can guide CCDF equity assessments, the theory of change needs to describe how CCDF systems can move children and families from a place of inequity to a place of greater equity.

CCDF systems are made up of interrelated and interacting parts (resources, rules/policies, practices, and participating providers) that together help connect families with low incomes with assistance and facilitate access to quality child care services. CCDF systems are embedded in larger State, Territory and Tribal Areas' early care and learning systems and are also surrounded by their broader economic, social, cultural, and political environments. A useful theory of change needs to explain how components within the CCDF system interact and work together to shape outcomes for children and families, and show the boundaries of the system as well. In other words, the theory of change needs to identify factors inside the CCDF system's control (i.e., the specific CCDF policy levers), that can either advance, or in some cases hinder, greater equity, and *how*.

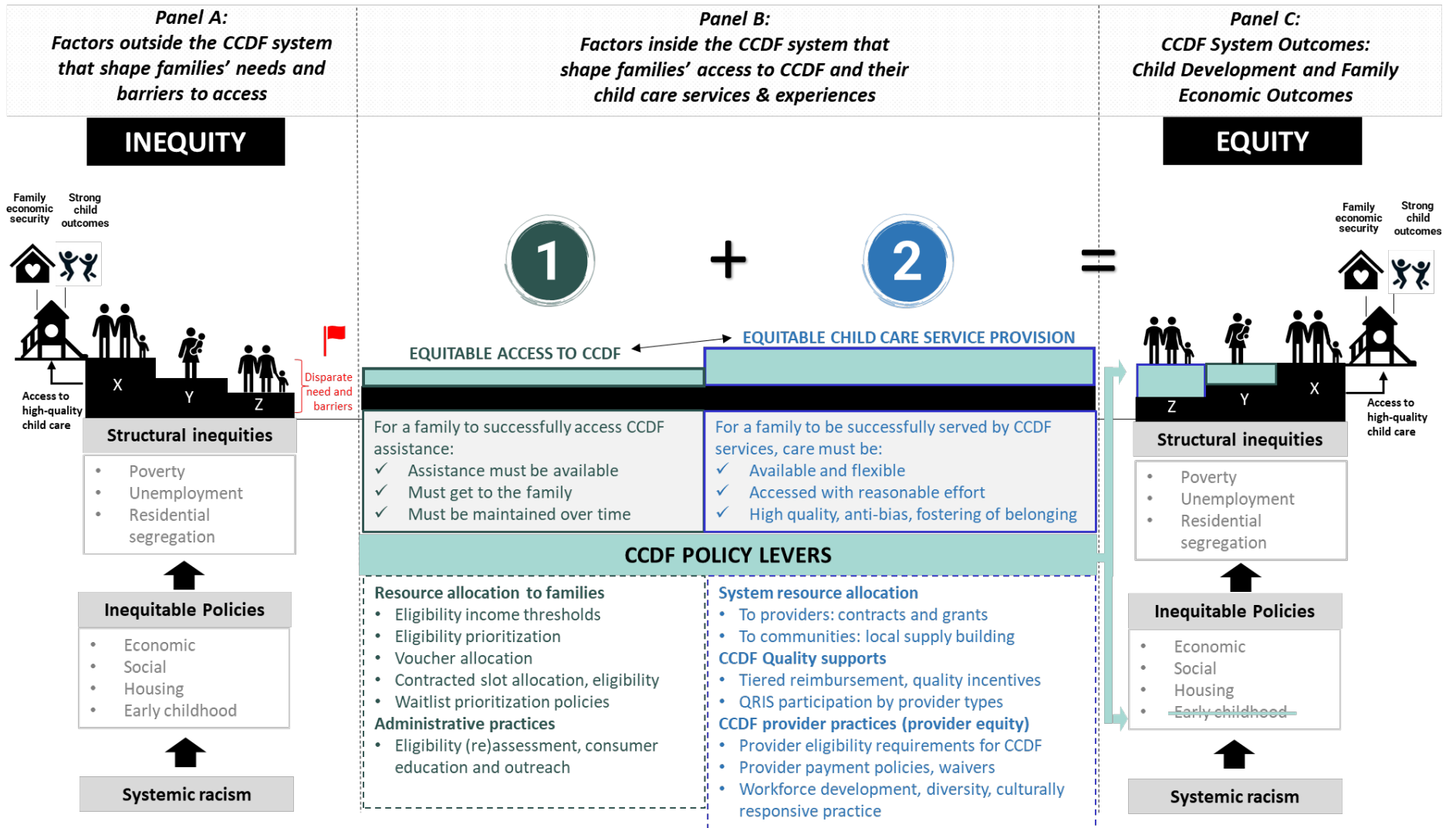
CCDF policy levers are the specific tools that Lead Agencies can use to direct resources, manage, and shape changes to their CCDF systems, and are critical components of CCDF systems that drive outcomes for children and families. Potential levers include CCDF policies and practices related to resource allocation to families, administrative practices, resource allocation approaches for providers, communities and families, quality improvement supports, and workforce and provider practices (See Exhibit 1.1, Panel B for detailed list of key CCDF policy levers related to equity; please note that this is not an exhaustive list of all levers but rather a starting point).

In this section, we provide a theory of change that breaks down CCDF systems into their key component parts and illustrates how CCDF policy levers can equitably support the two interrelated aims of the CCDF system, to 1) connect families to CCDF assistance, and 2) connect families to high-quality child care. This theory of change was developed by experts at NORC with input from federal staff at OCC and at the Office of Planning, Research and Evaluation. As such, this theory of change represents an initial attempt to convey the CCDF system; however, we expect that T/TA providers and Lead Agencies may expand or refine this theory of change as needed to better represent their context and needs.

The following section (Section 2: Guide to key CCDF system factors for advancing equity) describes key CCDF policy levers that a Lead Agency could examine in an equity assessment, and explains how each CCDF policy lever relates to creating more equitable access to CCDF assistance and high-quality affordable child care. Although this list provides a comprehensive account of key levers, it is not meant to be exhaustive. Lead Agencies may choose to focus their assessments on other levers that are of particular importance to their contexts.

Exhibit 1.1 provides a visual representation of a theory of change about how the policies and practices that shape CCDF systems can advance equitable outcomes for children's development and families' economic security.

Exhibit 1.1 Theory of Change: How can CCDF Systems Advance Equity for Children and Families?



Summary of Theory of Change:

The theory of change (Exhibit 1.1) shows how CCDF systems can move families from a place of inequity (see Panel A) to a place of equity (see Panel C). Panel B describes the key factors *within* CCDF systems that can advance equity (or can perpetuate inequity), and identifies specific CCDF policy levers that can work to produce more equitable system outcomes.

Panel A helps us to understand what underlies the inequities that families face—i.e., how the forces of systemic racism lead to inequitable policies that, in turn, generate structural inequities for children and families.

Panel B illustrates that while these structural inequities cannot be fully erased by the CCDF system alone, CCDF policies can compensate for some of the inequitable (i.e., unequal and unfair) barriers some groups of families face by connecting them to CCDF assistance and high-quality affordable child care.

Panel C reflects the end results of more equitable CCDF policies and practices: More equitable access to affordable high-quality child care for working families with low incomes promotes more equitable child development and family economic outcomes.

Explanation of Exhibit 1.1: Theory of Change

The purpose of the CCDF system is to help families with low incomes gain access to affordable high-quality child care so they can work to support their families, and so that their children can be supported to reach their full developmental potential.

CCDF policies target families with low incomes because they are most affected by child care affordability challenges, and because their children face the most risk of *not* having the early childhood experiences that help them reach their full potential. CCDF aims to break down the barriers related to affordability and access to high-quality child care that families with low incomes face.

The overarching idea of the theory of change is that families come to the CCDF system from a place of **inequity**, where families with low incomes face systemically unfair barriers to access to affordable high-quality care, which if not overcome leave the needs of many families and children unmet.

The overarching idea is that the CCDF system can help move families and children from a place of *inequity* to a place of *equity* where systemic and unfair barriers to affordable high-quality care have been successfully broken down, and where all families and children's specific care needs are met.

Let's now explain Exhibit 1.1

Panel A: Inequity

The entry point into this theory of change is the picture of the families depicted on the left who enter the CCDF system from a place of inequity. We see three groups of families: X, Y, and Z. In the picture, the black risers reflect the different levels and types of barriers that families in the different groups face. Families in groups X, Y, and Z face systematically different opportunities and barriers to access to high-

quality child care and early education, which is depicted by the tree house image that the different groups of families are trying to access or get to. Families in group X may face no systemic barriers, and even have advantages, while families in groups Y and Z face affordability and access challenges that if unaddressed will contribute to poor economic and child development outcomes for these families. The policy goals of CCDF include not only facilitating greater access to child care for families that are not on that top riser, but also ensuring that the families in those groups (i.e. groups Y and Z) receive care that is high quality.

It is important to note that these different sets of barriers that families face are not just unequal, they are considered **inequitable**. Unequal means “not the same”(i.e., a difference, and a difference can be benign). These differences are considered **inequitable** because they are not benign, i.e., they are the result of systemic (or what we call “structural”) barriers that fall outside of the control of any individual family or child, and that systematically harm some groups of children and families (while unfairly advantaging other groups).

Below the families in Panel A, the image depicts the forces of structural inequity that result in unfair circumstances and opportunities for families. “Structures” are the larger set of interrelated systems that families operate in, including the job and housing markets, and the transportation, education, and justice systems. These structures interact in ways that create barriers that make it more difficult for some families to access key opportunities, like affordable high-quality child care for their children.

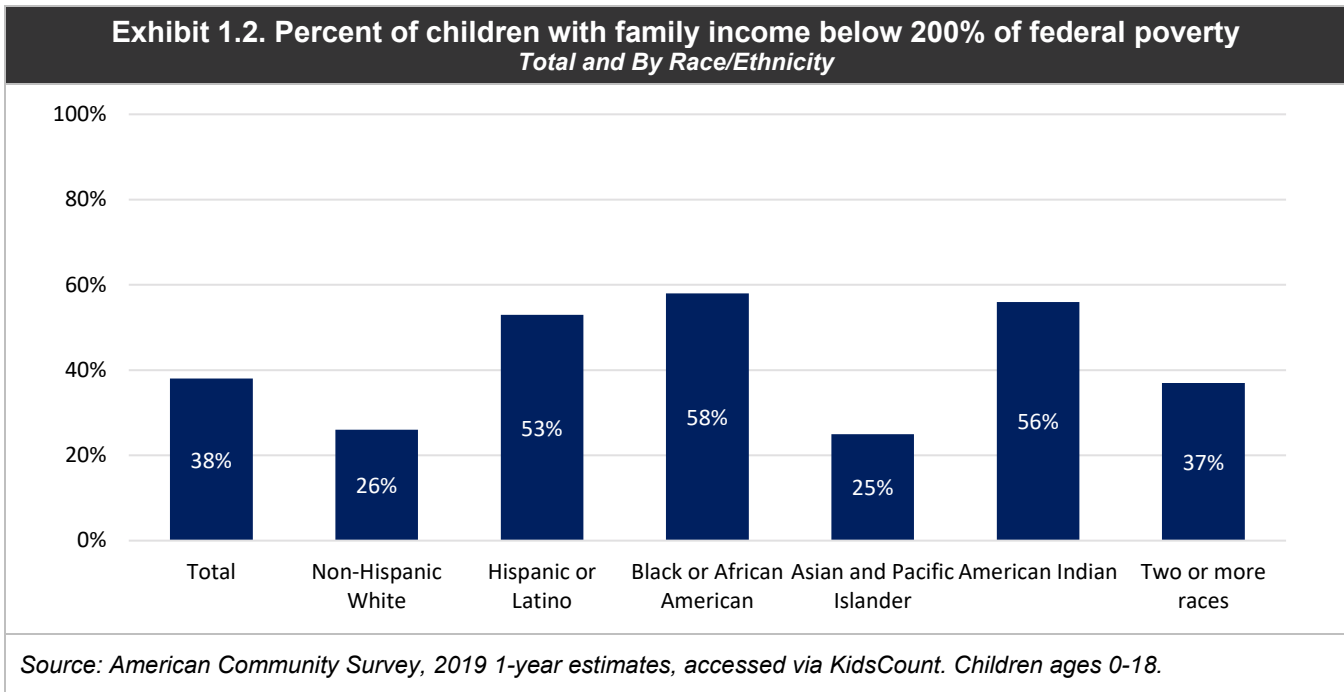
Underlying the structural inequities are inequitable policies--these are the drivers of the structural inequities that lead to high barriers to access for many families and children. Our past and existing economic, social, health, educational and housing policies have produced and reinforced structural inequities. However, the positive news is that if structural inequities are created by policies then they can also be *interrupted* by policies and programs that intentionally account for and work to offset and confront inequities for children and families, like CCDF policies have the potential to do.

Finally, driving inequitable policies and structural inequities are the forces of systemic racism, a form of racism that is embedded in our policies, practices, and norms, that results in exclusion and discrimination that negatively affects children and families on the basis of their race or ethnicity (or other aspect of identity), above and beyond other factors such as poverty.

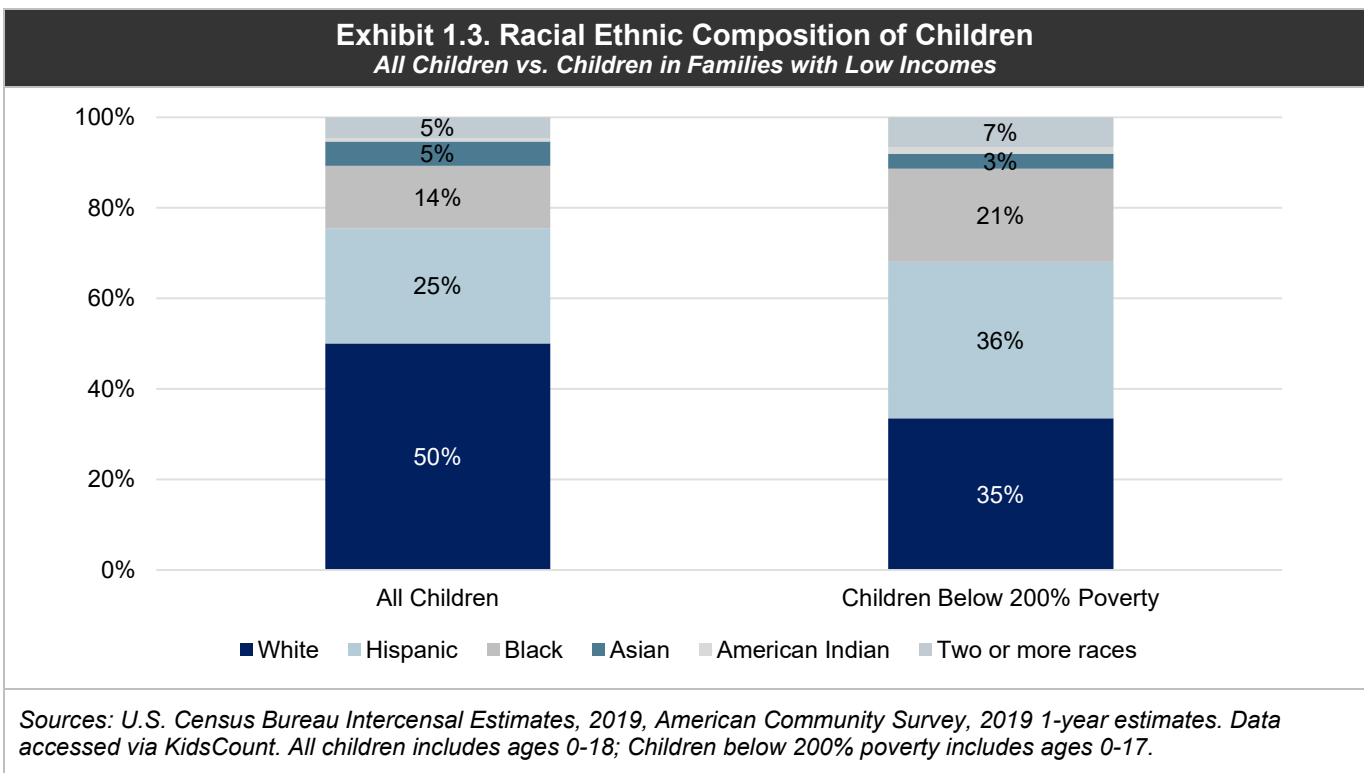
There are two ways that systemic racism factors into how families enter into the CCDF system that are depicted in the picture.

First, systemic racism shapes how likely families and children of different racial and ethnic groups are to be in each of the three groups of families (i.e., groups X, Y, or Z). African American, Black, Latino, Hispanic, Indigenous, American Indian Alaskan Native, Asian Americans and Pacific Islanders and other persons of color are more likely to fall into groups Y and Z facing higher structural barriers to accessing high-quality affordable child care.

Families in the groups named above are more likely to have low incomes and face care affordability and access challenges. National data depicted in Exhibit 1.2 show that Black, Hispanic, and American Indian and Alaskan Native children are much more likely to grow up in families with low incomes (incomes below 200% of the federal poverty level) compared to non-Hispanic White children in the U.S.



As a result, families in these groups represent a larger share of families in need of CCDF assistance than the share they represent in the broader population. Exhibit 1.3 shows that while 39% of all children in the U.S. overall are Black or Hispanic, 57% of all children in families with low incomes in the U.S. (those most likely to be eligible for CCDF) are Black or Hispanic.



When some population groups (for example, some racial or ethnic groups) are overrepresented among those in need of CCDF, this shapes what we define as **disparate need**: systematic differences in the

level of need across population groups, with some groups experiencing systematically greater need on the basis of their race, ethnicity or other marker of identity.

In addition to disparate need, there are also disparities in the number and nature of barriers that families in groups Y and Z face that also affect how families enter into the CCDF system. Families in the racial, ethnic and identity groups named above are likely to systematically face additional or unique barriers to accessing affordable high-quality child care. In order to advance equity, families’ needs must be consistently and systematically met, regardless of their different needs and barriers entering the system. These differences are **disparate barriers to access**.

Panel B: Factors in the CCDF system that shape families’ access to CCDF and their child care services & experiences

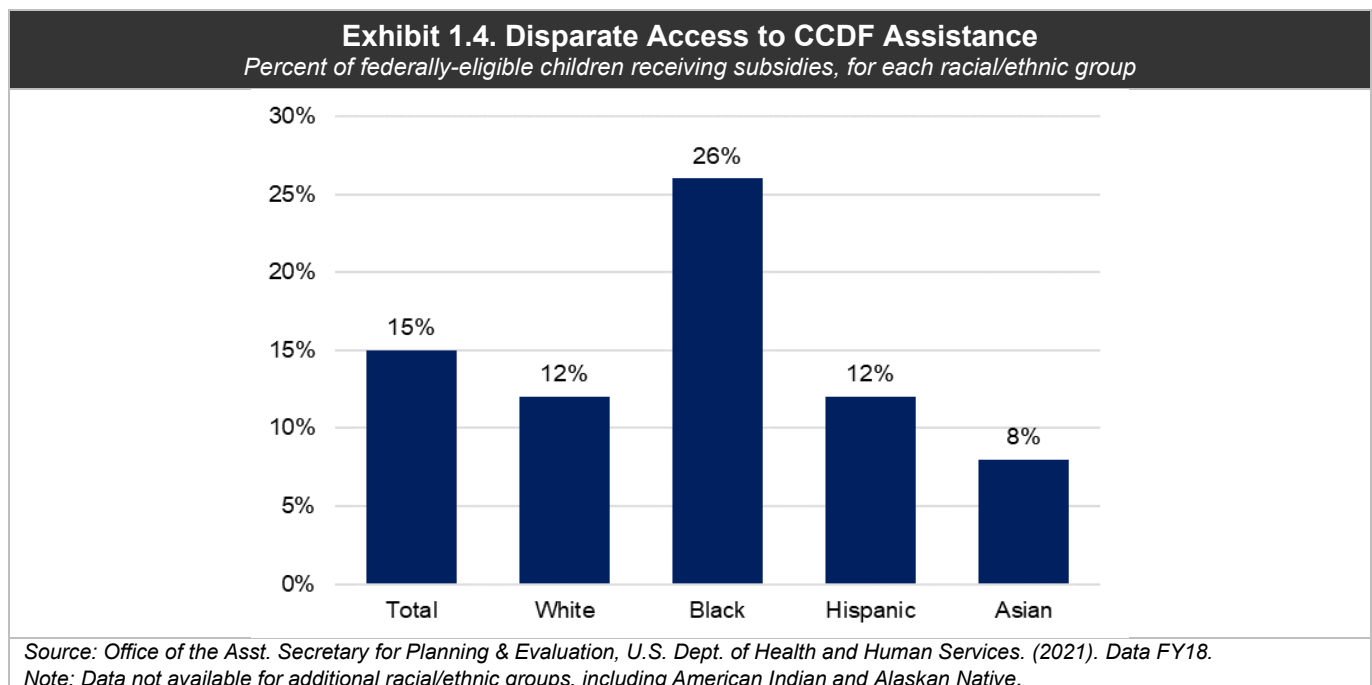
How can the CCDF system advance equity for children and families?

The CCDF system can advance equity by addressing disparate need and disparate barriers to access to high-quality child care through two sets of equitable practices:

- 1) Providing equitable (fair, consistent) access to CCDF assistance
- 2) Providing equitable (fair, consistent) child care services

In practice, what does that mean?

For #1- Providing equitable (fair, consistent) access to CCDF assistance: This means breaking down the barriers to access to CCDF assistance. Assistance needs to be available, needs to make its way to families, and needs to be maintained over time. Equitable access means that all families in need have access to assistance, and there are no group disparities in the percentage of families in need who gain access to assistance. Exhibit 1.4 shows that children who are equally income-eligible for CCDF assistance are not currently equally likely to receive CCDF assistance. These patterns point to differences in access to CCDF assistance on the basis of race and ethnicity among those who are likely to be eligible.



For #2 - Providing equitable (fair, consistent) child care services: This means ensuring that child care service provision is even, fair, and consistent for all groups of families and children. It means that families of different groups receive care that is not only available, and accessed with reasonable effort, but that children are spending their days in high-quality, developmentally stimulating, nurturing and anti-bias settings where they feel a strong sense of belonging--i.e., settings where their social, emotional, linguistic, and cultural needs are met, and where their strengths/assets are activated. Equitable access would mean that all families/children have access to care that meets these criteria, and we find no group disparities in the services provided/experienced across groups.

Across both of these practices, it is the case that the places in the system that can advance equity are the places in the system where inequities can emerge or be perpetuated. In other words, inequities will show up when assistance and services are not available to all families/children in need, when there are systematic differences in which families are or are not able to access assistance and services, and when there are systematic differences in how different groups of families are able to maintain their assistance and services. Moreover, inequities will show up when families have differential access to and use of high-quality care that supports children's development and allows families to work and thrive.

CCDF systems can use the CCDF policy levers they have to ensure equitable access and service provision. CCDF systems have many levers that can be activated to advance equity. In Panel B, key levers are identified and grouped into those that facilitate equitable access to CCDF assistance and those that facilitate equitable service provision.

The specific ways that each lever can advance equity (or contribute to inequity) will be described in the next section (Section 2 - Guide to key CCDF system factors for advancing equity).

Panel C:

In Panel C, we see the three groups of families that started from a place on inequity are now on more equitable footing. In this place, more equitable access to affordable high-quality child care drives greater family economic security and improved child development outcomes. The CCDF system has helped families in groups Y and Z to overcome the structural barriers they faced (that were outside of families' individual control but within CCDF system control) to access high-quality affordable child care.

We also notice in Panel C that systemic racism, inequitable policies, and structural inequities are still present. The CCDF system alone cannot remove those—they will still persist, but the CCDF system has meaningfully helped children and families to largely offset key risks and challenges they face to achieving stronger economic and developmental outcomes and has advanced equity overall.

Glossary of Key Terms & Concepts

Equity

“Equity means that with fair and just treatment to all, children and families and those who support them have opportunities to reach their full potential. Equity promotes consistent, systemic, and equitable access to comprehensive services and systems for African American, Black, Latino, Hispanic, Indigenous, American Indian Alaskan Native, Asian Americans and Pacific Islanders and other persons of color; members of religious minorities; LGBTQ+ persons; persons with disabilities; persons who live in rural areas; and persons otherwise adversely affected by persistent poverty or inequality.

Equity means ensuring:

- An anti-bias and nurturing environment where children, families, and staff feel seen, heard, acknowledged, and have a sense of belonging and a connection to their community.
- Resources, opportunities, systems, policies, and supports that enable each child to reach their highest learning and life potential; and enable all providers, staff, and every family to reach their highest life potential.
- Program-level protective, promotive, and supportive factors are in place, including employing effective and inclusive program leadership and governance practices with a social justice lens; providing culturally sensitive parent and family engagement; using teaching, learning, and developmentally, culturally and linguistically appropriate practices; and facilitating access to high quality health and behavioral health services for children and families.
- A commitment to meaningfully engage the voices of the communities who have been historically marginalized, who we serve across early childhood and school-age care systems. These systems include local Early Head Start; Head Start; Migrant and Seasonal Head Start, American Indian Alaskan Native Head Start; child care in all systems, including state, territory, and tribal systems; and child care in all settings, including family child care homes and family, friend, and neighbor care.”

(Equity, Inclusiveness & Culturally and Linguistically Responsive Practices (EI&CLRP) Joint Workgroup of the Administration for Children and Families, 2021)

Equity (vs. equality)

Children and families can access the opportunities (i.e., services, treatment, educational and work experiences) they need to reach their full potential, free from bias or discrimination. Equity is distinct from the notion of equality which emphasizes receiving the same (i.e., equal) opportunities, regardless of differing needs.

Child care and early education

Child care and early education (CCEE) refers to care for children ages 0-12 including early care, early education, and school-age child care. The term ‘child care’ is used for brevity throughout this Toolkit to refer to all forms of child care and early education.

Access to child care

‘Access’ to high quality child care depends on four factors: 1) affordability, 2) ‘reasonable’ effort to find, enroll and attend a program, 3) alignment with parents’ needs (e.g., hours of operation), and 4) programs/services that support a child’s developmental needs (e.g., linguistic needs) (U.S. Office of Planning, Research & Evaluation, 2017).

Equitable access

Equity is not about ‘equal’ treatment, rather that all children have their specific needs met. Equitable access to child care means the *absence* of systematic unfair and avoidable differences in opportunities to access high-quality child care that supports child development and family economic security between population groups defined socially, economically, demographically or geographically (adapted from World Health Organization, “WHO” definition of Health Equity) (WHO, 2010).

Glossary of Key Terms & Concepts (continued)

Structural factors (or “structures”)

“Structures” are the larger set of interrelated systems that families operate in, including the job and housing markets, and the transportation, education, and justice systems. These structures interact in ways that create barriers that make it more difficult for some families to access key opportunities, like affordable high-quality child care for their children. Structural factors fall outside of the control of any individual family or child.

Inequity (vs. unequal)

Unequal means “not the same” (i.e., a difference), which can be benign. Inequities are differences that are unfair, avoidable, or remediable. They are the result of systemic (or what we call “structural”) barriers that fall outside of the control of any individual family or child, and that systematically harm some groups of children and families while unfairly advantaging other groups. Inequitable can apply to inequitable outcomes or inequitable opportunities (that shape inequitable outcomes). A disparity (i.e., a harmful difference) is another term for an inequity.

Systemic racism

Systemic racism is a form of racism that is embedded in our policies, practices, and norms that results in exclusion and discrimination that negatively affects children and families on the basis of their race or ethnicity (or other social or demographic factors), above and beyond other factors such as poverty.

Disparate need

Systematic differences in the level of need across population groups, with some population groups experiencing systematically greater need on the basis of their race, ethnicity or other social or demographic factors.

Disparate barriers to access

The presence of systematic differences between population groups in the number and nature of structural barriers to access, where groups of families on the basis of race, ethnicity or other social or demographic factors systematically face additional or unique barriers to accessing affordable, high-quality child care.

CCDF Lead Agency

The agency within a State, Territory or Tribal Area that is designated to administer the Child Care and Development Fund Program in the agency’s jurisdiction in accordance with applicable Federal laws and regulations and within provisions of the jurisdiction’s CCDF plan.

CCDF System

CCDF systems are made up of interrelated and interacting parts (resources, rules/policies, practices, and participating providers) that together help connect low-income families with assistance and facilitate access to quality child care services. CCDF systems are embedded in larger State, Territory and Tribal Areas’ child care and early learning systems, and are also surrounded by their broader economic, social, cultural, and political environments.

CCDF Policy Lever

CCDF policy levers are the specific tools that Lead Agencies can use to direct resources, manage, and shape changes to their CCDF systems. See Exhibit 1.1 for CCDF policy levers related to equitable access to high-quality child care, and Section 2 for an explanation of how CCDF policy levers can be used to advance greater equity.

CCDF Plan

The CCDF Plan serves as the Lead Agency’s application for CCDF funds by providing a description of how the program will be administered in accordance with CCDF law and regulations to provide high-quality child care services to eligible families. The CCDF Plan also presents an opportunity for States, Territories, and Tribes to demonstrate the activities and services they are providing to meet the needs of low-income children and families.

Section 2: Guide to key CCDF system factors for advancing equity

This section focuses on the key CCDF system factors (i.e., CCDF policy levers) identified in the theory of change, explaining how each factor can potentially increase (or even unintentionally hinder) equity. As described in the theory of change, CCDF Lead Agencies have a set of policy levers at their disposal that they can use to work towards greater equity in families' access to 1) CCDF assistance, and to 2) high-quality child care services. The tables in this section are meant to provide an initial guide for thinking about the different components of the CCDF system that could possibly be used to advance equitable access to high-quality affordable child care for families. Although this section provides a comprehensive account of key levers, the list of levers is not meant to be exhaustive.

Tables 2.1 and 2.2 list CCDF policy levers and explain how each lever may contribute to equity (or inequity). Table 2.1 outlines the set of CCDF policy levers related to access to CCDF assistance itself (#1 in the theory of change, See Exhibit 1.1, Panel B) and Table 2.2 addresses the set of CCDF policy levers related to access to high-quality child care services (#2 in the theory of change, See Exhibit 1.1, Panel B). Specifically, each table includes:

- A description of what the CCDF policy lever is
- The related section in the CCDF Plan for State/Territories (the “CCDF Plan”)
- How the lever is expected to relate to (in)equitable access and outcomes
- How CCDF Lead Agencies could consider utilizing the lever to advance equity
- Initial assessment (reflective) questions, and
- Considerations for CCDF Lead Agencies that T/TA providers could use to assist with prioritizing areas for equity assessment

Descriptions of how each lever is expected to relate to (in)equitable access and outcomes are based on informed hypotheses about how various factors support equity; however, researchers have not yet tested direct relations between these levers and equitable outcomes. As the field accumulates evidence about equity in the CCDF system, Lead Agencies can use this new information to refine their approach.

Based on the theory of change (see Exhibit 1.1 above), successfully accessing CCDF assistance is defined by the following three dimensions:

- ✓ Assistance must be available
- ✓ Assistance must get to the family
- ✓ Assistance must be maintained over time

For a family to be successfully served by child care services, the following three dimensions are key:

- ✓ Care must be available and flexible
- ✓ Care must be accessed with reasonable effort (in other words, close by)
- ✓ Care must be high quality, anti-bias, and foster belonging

The column labeled “Dimension of Access” in Tables 2.1 and 2.2 identifies how each policy lever could help families meet one or more of these dimensions of equitable access to affordable, high-quality child care.

Note: All CCDF Plan References in Table 2 refer to 2022-2024 CCDF Plans, which can be accessed at: [https://www.acf.hhs.gov/sites/default/files/documents/occ/FFY2022-2024 CCDF Plan Preprint for States and Territories.pdf](https://www.acf.hhs.gov/sites/default/files/documents/occ/FFY2022-2024%20CCDF%20Plan%20Preprint%20for%20States%20and%20Territories.pdf)

Table 2.1: CCDF Policy Levers for Advancing Equity – Equitable Access to CCDF Assistance

CCDF Policy Lever	What is it?	Dimension of access	How does this lever relate to (in)equitable access and outcomes?	How could CCDF Lead Agencies consider using this lever to advance equity?	Initial assessment (reflective) questions	Considerations for prioritization
Table 2.1 Section 1: Resource allocation to families						
<p>Eligibility income threshold</p>	<p>Within federal requirements, CCDF Lead Agencies can determine the income threshold for CCDF eligibility.</p> <p>→ <i>CCDF Plan Section 3.1 (Eligible Children and Families)</i></p>	<p>✓ Assistance must be available</p>	<p>If there are families above the current income threshold that face high affordability challenges and are in need of CCDF assistance but ineligible, there is unmet need.</p> <p>Due to systemic racism and structural inequities, some groups of families, on the basis of their race/ethnicity, nativity, and other markers of identity, are systematically more likely to have low incomes, and therefore are over-represented among families facing unmet need.</p> <p>Unaddressed unmet need that systematically harms certain groups of families will perpetuate inequitable family economic and child outcomes.</p>	<p>Raising the income threshold to expand the pool of eligible families could differentially benefit families of color, immigrant, differently abled, LGBTQ+ families, and those affected by persistent poverty.</p> <p>If groups of families facing greater systemic barriers benefit most from this action, equity will increase.</p>	<p>Are certain groups overrepresented among families that are above the income threshold but still in need of CCDF?</p> <p>Are the groups that stand to benefit most groups that experience disparate access to CCDF assistance?</p>	<p>Ensure there is room to increase threshold within federal rules.</p> <p>Consider feasibility of garnering additional resources to expand access to CCDF assistance.</p> <p>If system has unmet need at current income thresholds, consider whether to expand/increase first or to address unmet need under existing income thresholds first.</p>

<p>Service prioritization</p>	<p>Lead Agencies are required to prioritize the needs of children experiencing homelessness, children with special needs, and children in families with very low incomes, <u>and</u> are allowed to identify additional priority groups.</p> <p><i>→CCDF Plan Section 3.3 (Increasing Access for Vulnerable Children and Families)</i></p>	<p>✓ Assistance must get to the family</p>	<p>Even among working families with low incomes eligible for CCDF on the basis of income, some groups of families may face increased systemic unfair barriers to access to CCDF assistance on the basis of race/ethnicity, culture, language, nativity, ability, sexuality, or experiences of persistent poverty. For example, families who have experienced poverty over a prolonged period may have greater challenges accessing information about child care subsidies due to constrained access to technology.</p> <p>One way to improve access and advance equity is to identify additional priority groups of families that face unfair barriers to accessing the CCDF system.</p>	<p>Granting priority status to specific racial/ethnic, culture, linguistic, ability, or sexuality groups may result in greater access to CCDF assistance for those groups.</p> <p>Lead Agencies can consider supporting priority groups by prioritizing them for enrollment, allowing them to bypass or gain priority on wait lists, waiving co-payments, paying higher payments for high quality care, using grants or contracts to reserve slots, and other strategies.</p>	<p>Beyond existing priority groups, what additional groups could benefit most from service prioritization?</p> <p>For example, are there groups that are persistently overrepresented on wait lists?</p>	<p>Ensure required groups are sufficiently prioritized for services first.</p> <p>This lever may be less relevant in undersubscribed CCDF systems (i.e. systems with excess assistance), and more salient in oversubscribed systems that can leave families unserved or on waitlists for long periods of time.</p>
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CCDF Policy Lever	What is it?	Dimension of access	How does this lever relate to (in)equitable access and outcomes?	How could CCDF Lead Agencies use this lever to advance equity?	Initial assessment (reflective) questions	Considerations for prioritization
Table 2.1 Section 1: Resource allocation to families (continued)						
<p>Voucher allocation</p>	<p>CCDF Lead Agencies have 'broad authority to administer (i.e., establish rules) and operate (i.e., implement activities of) the CCDF program.</p> <p>Under this authority, Lead Agencies develop approaches and formulas for allocation of vouchers based on child/family criteria (e.g., allocation of vouchers across eligibility categories), and also often on geographic criteria (local allocations based on local need).</p> <p>For example, while some agencies allocate vouchers State or Territory wide, others allocate by sub-regions, such as counties or Child Care Resource and Referral regions.</p> <p>→CCDF Plan: Section 1.2 (CCDF Policy Decision Authority).</p>	<p>✓ Assistance must get to the family</p>	<p>As mentioned above, some groups of families can face increased barriers to access to CCDF that are outside their individual control (structural barriers).</p> <p>A Lead Agency’s approach to allocating vouchers does not always account for the ways that barriers differ by racial/ethnic group, nor by geographic areas throughout the State, Territory or Tribal area—two closely related dynamics.</p> <p>When voucher allocation formulas have a geographic dimension—for example, when vouchers get allocated by CCDF service region or county based on need in those areas—the concern is that families <i>within</i> allocation areas may not have equitable access to vouchers.</p> <p>For example, high levels of racial segregation across the U.S. means that—even <i>within</i> smaller areas like counties and cities/towns-- families with low incomes of different race/ethnicities are segregated by neighborhood/ community. This means that allocating more vouchers to a high-need county overall will not, alone, guarantee that vouchers get to the highest need families <i>within the</i> county. This will perpetuate disparate access to CCDF resources.</p>	<p>CCDF Lead Agencies may incorporate child, family and geographic criteria that work to potentially increase the likelihood that vouchers are allocated more intentionally to the groups of families facing greater systemic barriers to access, and/or to groups that are concentrated in very localized geographic areas (e.g., neighborhoods within counties or cities/towns) where barriers may be higher.</p> <p>For CCDF Lead Agencies that allocate subsidies through sub-state, sub-territory or sub-tribal area regions, consider the benefits of increasing allocations in areas that are home to larger concentrations of children facing increased barriers to access to CCDF assistance.</p> <p>Note: The smaller the geographic areas targeted, the greater the chance that equitable access will be achieved. (To learn more see: Hardy, et al., 2021).</p> <p>Moreover, Lead Agencies that do not currently allocate by sub-areas may consider geographic/localized approaches to voucher allocation as a way to more directly target children concentrated in very localized areas that may face increased barriers to access.</p>	<p>What child, family and geographic criteria are used to guide voucher allocation?</p> <p>Are there imbalances in the voucher allocation approach that may favor some groups while disadvantaging others?</p> <p>Consider this:</p> <p><i>Imagine a county with a large subsidy eligible population – half of eligible families are White and just below the subsidy threshold (assume it is near 200% FPL), and the other half are Black and lower income-- just above 100% FPL. The county overall has the largest concentration of subsidy eligible families in the state and gets a larger allocation of subsidies than other counties.</i></p> <p><i>If this county gets a high voucher allocation and then families within the county have a random chance of getting a subsidy (assume the system is oversubscribed and families are randomly selected from waitlist), this approach will not ensure that vouchers are being prioritized to the highest need families to advance equity.</i></p>	<p>Using geography in voucher allocation may be most impactful in areas with high levels of subgroup (e.g., racial/ethnic, linguistic) diversity.</p> <p>Almost all areas across the U.S. that are racially diverse face high levels of segregation (Acevedo-Garcia et al., 2020), making this approach a prime area to consider for equity assessment in most jurisdictions.</p> <p>This lever may be less relevant in undersubscribed CCDF systems (i.e., systems with excess assistance), and more salient in oversubscribed systems.</p> <p>In undersubscribed systems, geography can be used in other ways to expand access to groups facing higher barriers. For example, through increased recruitment and targeting in areas where CCDF need is high and participation rates are low (See consumer education and outreach below).</p>

CCDF Policy Lever	What is it?	Dimension of access	How does this lever relate to (in)equitable access and outcomes?	How could CCDF Lead Agencies use this lever to advance equity?	Initial assessment (reflective) questions	Considerations for prioritization
Table 2.1 Section 1: Resource allocation to families (continued)						
Contracted slots	<p>CCDF Lead Agencies can use grants or contracts to reserve slots for priority populations.</p> <p>→ <i>CCDF State Plan: Section 3.3 (Increasing Access for Vulnerable Children and Families)</i></p>	<p>✓ Assistance must get to the family</p>	<p>As mentioned above, under ‘Service Prioritization’, some groups of families systematically face increased barriers to access to CCDF assistance.</p> <p>Lead Agencies have both requirements and also flexibility to determine how to prioritize services, and have multiple tools (including reserving contracted or grant-supported slots) to prioritize services to specific groups of families.</p> <p>A Lead Agency’s current service prioritization approaches may or may not be designed to work to offset systemic unfair disparate barriers to access to CCDF assistance on the basis of race/ethnicity, culture, language, nativity, ability, sexuality, or experiences of persistent poverty.</p>	<p>This lever can potentially be used by Lead Agencies to advance greater equity by prioritizing services for families who face increased unfair structural barriers (outside their individual control) to access to CCDF assistance.</p> <p>Consider whether contracted slots can be reserved to expand access to CCDF-supported child care services for specific racial/ethnic, culture, linguistic, ability, religious minority or sexuality groups that may have lower rates of and face increased barriers to access to CCDF assistance.</p>	<p>How are contracted/grant slots currently allocated, reserved, and prioritized?</p> <p>Does this approach systematically favor or disadvantage particular groups of children and families?</p>	<p>CCDF Lead Agencies that already have contracting systems established may be best positioned to make use of this policy lever.</p> <p>Lead Agencies that have not historically used contracting systems can consider how implementation of a contracting system could be used as a tool for prioritizing services in ways that intentionally offset inequities.</p> <p>For Lead Agencies with existing contracting/grant systems can consider the feasibility of modifying allocation of contracted/grant-supported slots, and/or securing additional resources to expand slots for additional priority groups.</p>
Waiting list policies	<p>Lead Agencies have broad authority to develop waiting list policies that rank eligible families in a priority order, or that allow families that meet specific criteria to bypass waitlists all together.</p> <p>→ <i>CCDF plan Section 1.2 (CCDF Policy Decision Authority)</i></p>	<p>✓ Assistance must get to the family</p>	<p>When Lead Agencies do not have the resources to serve all eligible families, they may rely on waiting lists to help them decide how to allocate assistance as soon as it becomes available.</p> <p>Waiting list policies are among the tools that Lead Agencies have to prioritize services to specific groups of families that may face additional barriers to access to CCDF assistance.</p>	<p>In oversubscribed CCDF systems (i.e., systems where there are more families who have applied for CCDF assistance than there is CCDF assistance available), Lead Agencies may consider implementing waiting list policies designed to affirmatively benefit groups that face increased barriers to access to CCDF assistance.</p>	<p>Does your system maintain a CCDF assistance waiting list?</p> <p>How are families ranked on waiting lists – on a first come, first serve basis, by eligibility category, child age, other criteria?</p> <p>Does the current approach systematically facilitate or hinder access for particular groups?</p>	<p>Waiting lists are most relevant in jurisdictions that experience oversubscription (i.e., eligible applicants in excess of subsidies available).</p> <p>Consider how multiple service prioritization tools (e.g., contracted slots and waitlists) might be used in coordination to facilitate greater access to CCDF assistance to groups that face additional barriers.</p>

CCDF Policy Lever	What is it?	Dimension of access	How does this lever relate to (in)equitable access and outcomes?	How could CCDF Lead Agencies use this lever to advance equity?	Initial assessment (reflective) questions	Considerations for prioritization
Table 2.1 Section 2 Administrative practices and consumer information						
<p>Consumer education and outreach</p>	<p>Lead Agencies are required to develop procedures to clearly communicate about CCDF assistance (e.g., eligibility information) and child care provider information to families of all backgrounds.</p> <p>Lead Agencies are required in CCDF Plans to describe outreach approaches to Limited English Proficiency (LEP) families and Persons with Disabilities.</p> <p><i>→CCDF Plan Section 2.1 (Outreach to Families with Limited English Proficiency and Persons with Disabilities)</i></p>	<p>✓ Assistance must get to the family</p>	<p>In order for CCDF assistance to get to families in need, families must become aware of the program, and learn of their potential eligibility, and how to apply for assistance.</p> <p>There can be systematic group differences in access to information about CCDF assistance, and this can impact participation in CCDF assistance programs.</p> <p>For example, some racial/ethnic groups may be more affected by information barriers if they have larger shares of families with Limited English Proficiency (LEP); or large shares of immigrant families, who may be less socially and geographically connected to networks of other families with low incomes currently accessing CCDF assistance, and/or hesitant to pursue social assistance based on their immigration status. (Haley et. al., 2021) (Gelatt & Koball, 2016)</p> <p>Groups with systematically less access to information about CCDF may be less likely to successfully obtain assistance, perpetuating disparities in access.</p>	<p>Lead agencies may develop procedures and policies that prioritize outreach and engagement with groups facing increased barriers to information about the CCDF program and their potential eligibility.</p> <p>Targeted strategies could potentially extend information to LEP families, families with disabilities, immigrant families, and racial/ethnic and other identity groups that may have less information about CCDF that they can readily access.</p> <p><i>See CCDF state plan, Section 2.1 for example strategies.</i></p>	<p>Could families of different race/ethnicities have systematically different levels of access to and types of information about CCDF?</p> <p>Are there targeted outreach approaches in place to ensure information is proactively reaching groups of families that face increased barriers to accessing information about CCDF?</p>	<p>Targeted outreach may be of particular concern/priority for Lead Agencies with racial/ethnic groups with substantial variation in terms of linguistic status and nativity, and in states experiencing rapid growth in low-income immigrant families.</p> <p>In these contexts, consider how information support and strategies may need to differ <i>within</i> racial/ethnic groups.</p>

CCDF Policy Lever	What is it?	Dimension of access	How does this lever relate to (in)equitable access and outcomes?	How could CCDF Lead Agencies use this lever to advance equity?	Initial assessment (reflective) questions	Considerations for prioritization
<p>Table 2.1 Section 2 Administrative practices and consumer information (continued)</p>						
<p>Administrative practices</p>	<p>CCDF Lead Agencies are required to have policies for verifying eligibility at the time of redetermination.</p> <p>There are no federal requirements for procedures, providing CCDF Lead Agencies with flexibility to develop administrative processes for families to apply and re-certify their eligibility for assistance.</p> <p>→CCDF Plan Section 3.1.8 (Documenting eligibility), 3.1.7 (Documenting fluctuation in earnings), Section 2.1 (Outreach to Families with Limited English Proficiency and Persons with Disabilities)</p>	<ul style="list-style-type: none"> ✓ Assistance must get to the family ✓ Assistance must be maintained over time 	<p>Applying for and maintaining child care assistance can be a complex process for many families. If a family cannot obtain and maintain assistance, it cannot access consistent, stable high-quality care to support their children and their ability to work.</p> <p>Families that are already balancing work, children, and the dynamics of raising children in poverty need to learn how the application process works, confirm their eligibility, attend appointments, and gather paperwork to apply initially and to maintain their eligibility over time. These processes can create barriers and lead to families never obtaining a subsidy in the first place, or losing access to it prematurely.</p> <p>This administrative ‘burden’ has been found to be disparate on the basis of race/ethnicity, nativity, language, and disability—i.e. the burden is systematically higher for some groups of families, including, for example, immigrant families who may be unsure of their eligibility or face documentation barriers; families with Limited English Proficiency who may not have access to interpreters or adequate support throughout the administrative process; and/or families that work in multiple jobs, and/or informal or shift arrangements that can create challenges with uneven income and employment status, and paperwork challenges. (Office of Management and Budget, 2021)</p>	<p>CCDF Lead Agencies have the flexibility to create family-friendly administrative practices that directly confront disparate administrative burden for particular groups, and have been shown in research to improve stability of access to CCDF. (Ha et al.) (Gennetian et al., 2019)</p> <p>Lead Agencies may break down administrative barriers that likely contribute to disparities in access to CCDF assistance by using strategies like:</p> <ul style="list-style-type: none"> • Extending eligibility redetermination policies beyond the minimum 12 months for priority groups, • Ensuring families have equitable supports and opportunities to apply and re-certify eligibility for CCDF assistance (ample locations and times for appointments, virtual and phone appointments, reduced paperwork burden, translation services, information in multiple languages). 	<p>Does the current application and/or recertification process present greater barriers to access to CCDF for specific groups of families?</p> <p>Could more be done to facilitate access to groups that face higher administrative burden?</p> <p>Do practices and procedures vary locally? If so, are some localities implementing more family-friendly practices than others? Are some groups benefiting more/less from these family-friendly practices based on where they live?</p>	<p>Many CCDF systems face staffing and resource constraints to improve administrative practices.</p> <p>Consider whether there are ample staff and organizational resources, or the potential to secure additional staff and resources to implement more equitable administrative procedures.</p>

Table 2.2: CCDF Policy Levers for Advancing Equity - Equitable Access to High-Quality Child Care Services

CCDF Policy Lever	What is it?	Dimension of access	How does this lever relate to (in)equitable access and outcomes?	How could CCDF Lead Agencies use this lever to advance equity?	Initial assessment (reflective) questions	Considerations for prioritization
Table 22 Section 1: System resource allocation						
<p>To providers: contracts and grants</p>	<p>In addition to vouchers, Lead Agencies can provide child care services through contracted or grant-supported slots.</p> <p>Lead agencies can use contracts to increase the supply of slots and/or quality of slots among providers that serve specific groups of children.</p> <p><i>→CCDF Plan Section 4.1.6 (Child care services available through grants and contracts)</i></p>	<ul style="list-style-type: none"> ✓ Care must be available and flexible ✓ Care must be high-quality, anti-bias, fostering of belonging 	<p>Many CCDF systems experience shortages in the supply of high-quality child care providers that meet parents' needs. These shortages can contribute to inequities in service provision.</p> <p>Contracts that are used to increase supply/quality of supply may create inequities if their requirements for participation (e.g., must be center-based, must be part of a family child care network) unfairly advantage/disadvantage families of different racial/ethnic groups.</p> <p>For example, if Black children statewide are more likely to attend independent family child cares (FCCs), but contracted providers must be part of an FCC network, then contracts are disadvantaging the types of providers more likely to be used by Black families and fostering an inequitable supply of providers.</p> <p>Usage differences in type of care are less about preferences, and more about structural factors that shape families' constraints (Mendez et al., 2018). For example, segregation in labor markets causes parents' work constraints (and their child care needs) to systematically differ by race/ethnicity—some groups have larger shares of parents working in irregular shift jobs or evenings, requiring non-traditional hours care (which independent FCCs may offer more of).</p>	<p>Consider whether contracts can be targeted towards providers that serve children in racial/ethnic and other identity groups that are experiencing systematically lower access to high-quality child care that supports children's development and families' ability to work and function.</p> <p>Lead Agencies have full flexibility to determine criteria for contracting/grant-making, and can contract with a variety of entities (e.g., shared services alliances, FCC networks, community based alliances, etc.) to reach priority populations of children and families.</p> <p>Lead Agencies can therefore use contracts/grants to create more equitable access to quality services for groups of children disproportionately impacted by shortages or lower access to quality services.</p>	<p>How are contracts and grants currently allocated to providers? Could changing the allocation approach improve racial/ethnic equity?</p> <p>How are contracts promoted/oriented towards different types of providers (e.g., center-based vs. home-based), and how might this facilitate (or hinder) access to care for children of different race/ethnicities?</p> <p>Do contract and grant allocation procedures directly offset supply shortages that disproportionately harm children of certain racial/ethnic groups?</p>	<p>CCDF Lead Agencies that already have contracting/grant systems established may be best positioned to make use of this policy lever.</p> <p>However, Lead Agencies that do not have contracting/grant systems can consider how implementing a contract/grant system could provide a tool for allocating resources to providers in ways that advance equity.</p> <p>For states with existing contracting/grant systems, consider the feasibility of modifying how contracts/grants are allocated across providers.</p>

CCDF Policy Lever	What is it?	Dimension of access	How does this lever relate to (in)equitable access and outcomes?	How could CCDF Lead Agencies use this lever to advance equity?	Initial assessment (reflective) questions	Considerations for prioritization
<p>Table 2.2, Section 1: System resource allocation (continued)</p>						
<p>To communities: local supply-building</p>	<p>Lead Agencies ‘must employ strategies to improve the supply and quality of child care services, especially in underserved areas’.</p> <p>→CCDF Plan Section 4 (Ensure Equal Access to Child Care for Low-Income Children), Section 4.1.8 (Supply-building strategies to meet needs of certain populations)</p>	<p>✓ Care must be accessible with reasonable effort</p>	<p>As described above, shortages in the supply of high-quality care can disproportionately harm children of some race/ethnic groups.</p> <p>When supply shortages have a geographic dimension to them (i.e., when entire neighborhoods or communities are in short supply of high-quality providers), racial/ethnic inequities can be exacerbated because children of different race/ethnicities, even if of similar low income, live in separate neighborhoods due to high and consistent levels of residential segregation across the U.S. When the neighborhoods where children of color are concentrated are the same neighborhoods where supply shortages are concentrated, local supply differences translate into racial/ethnic differences in access to high-quality care at the local level.</p> <p>When a family lacks high-quality providers within a reasonable distance of home they are less likely to use a high-quality provider, perpetuating disparities in service provision.</p>	<p>Embedding a local dimension into supply-building strategies may advance racial/ethnic equity. In the context of high levels of residential segregation, local inequities often mean racial inequities.</p> <p>Supply-building strategies may target a combination of racial/ethnic groups of children more impacted by supply shortages statewide <i>and</i> local shortages in areas where children of color are concentrated.</p> <p>For example, grant and contract resources can be allocated to providers that serve racial/ethnic groups of children most impacted by shortage areas statewide <i>and</i> providers in specific shortage areas where children of color are concentrated.</p> <p>Other supply-building approaches (e.g., building FCC networks, technical assistance, provider recruitment, tiered payment rates, business supports and start-ups), can similarly take this two-prong approach of targeting groups impacted statewide <i>and</i> specific areas where impacted groups are most concentrated.</p> <p>Also, note that the more local the focus (i.e., a focus on neighborhoods or zip codes instead of counties or cities/towns), the more likely these strategies may help advance racial/ethnic equity, since segregation occurs at such a localized level (To learn more, see Hardy et al., 2021).</p>	<p>How are children of different race/ethnicities segregated by locality?</p> <p>Are children of particular racial, ethnic, and other groups more concentrated in local child care shortage areas?</p> <p>Do existing supply-building strategies have a local dimension embedded that considers groups of families more impacted by local supply shortages?</p>	<p>CCDF Lead Agencies that are already targeting specific underserved areas with supply-building strategies may be (knowingly or unknowingly) advancing racial/ethnic equity.</p> <p>For Lead Agencies with local supply-building efforts in progress, consider assessing the expected racial/ethnic impacts of these ongoing efforts? Are these differentially benefitting groups most harmed by local supply shortages?</p> <p>If yes, consider expanding equity-advancing approaches, and/or modifying approaches that could do more to advance racial/ethnic equity in local access to high-quality care.</p>

CCDF Policy Lever	What is it?	Dimension of access	How does this lever relate to (in)equitable access and outcomes?	How could CCDF Lead Agencies use this lever to advance equity?	Initial assessment (reflective) questions	Considerations for prioritization
Table 2.2, Section 2: Quality supports						
<p>Tiered rates, quality incentives</p>	<p>States can use tiered or differential reimbursement rate strategies where they reimburse certain subsidized child care providers at higher rates (based on chosen criteria, such as providing child care outside of traditional 8 am to 6 pm hours).</p> <p>→CCDF Plan Section 4.3.3 (Tiered reimbursement or differential rates)</p>	<p>✓ Care must be high-quality, anti-bias, fostering of belonging</p>	<p>Tiered rate strategies create incentives for providers to serve particular groups of children (e.g., children with special needs, infants/toddlers), or to provide specific types of services (e.g., non-traditional hours care).</p> <p>Under tiered rate strategies that pay higher rates to higher quality providers, inequities can result if higher quality providers disproportionately serve children of particular racial/ethnic groups.</p> <p>A recent study of tiered rates in Pennsylvania found that higher-quality providers (who receive higher rates), were significantly less likely to serve Black and Hispanic children (Babbs Hollett and Frankenburg, 2022). These tiered rate policies are unintentionally resulting in limited resources being provided to the providers who serve Black and Hispanic children while simultaneously expanding resources to White children and providers in predominately White communities.¹</p> <p>If children/families of different race/ethnicities differentially benefit from these additional investments in high-quality providers, the tiered rate strategies could exacerbate (rather than confront) inequities.</p>	<p>CCDF Lead Agencies have the authority and flexibility to design tiered rate programs that advance equity.</p> <p>Tiered rate policies that invest resources in providers serving racial/ethnic groups facing increased barriers to access to high-quality care may in turn advance equity. Consider the example of tiered rate programs aimed at providers offering non-standard hours care.</p> <p>However, tiered rate policies tied to systems with inequities in them—for example, tiered rates tied to a QRIS rating system that excludes categories of providers more likely to serve children of color—are likely to reinforce racial inequities.</p> <p>Tiered rate systems that direct resources at providers <i>working towards</i> certain criteria (e.g., financial resources to support providers working towards higher quality) may also have the potential to promote greater equity in child care service provision.</p>	<p>Do certain racial/ethnic groups of families and/or communities benefit differentially from tiered rate policies in the jurisdiction?</p> <p>Do these differential benefits accrue to families facing the greatest barriers to access to high-quality care?</p> <p>Are there different or additional criteria that could be used to develop tiered rates that could do more to advance equity?</p> <p>Are there types of providers (e.g., high-quality family, friend, neighbor care), that may currently be excluded from tiered rate policies and that are disproportionately delivering quality child care to children of color?</p>	<p>Tiered rate policies tied to systems with underlying racial inequities (e.g., QRIS systems) are likely to exacerbate inequities, making them a priority for equity assessment.</p> <p>Consider the feasibility of re-allocating tiered rate funds to other approaches that may better advance racial equity (e.g., increased base rates for all providers, or for provider types disproportionately serving children of color with quality care).</p>

¹ Note that since November 2021 the state of Pennsylvania has taken steps towards more equitable rate policies, increasing base rates from the 25th percentile to the 40th and 60th over time, increasing base rates for relative and neighbor caregivers, and not increasing tiered funding rates to higher levels.

CCDF Policy Lever	What is it?	Dimension of access	How does this lever relate to (in)equitable access and outcomes?	How could CCDF Lead Agencies use this lever to advance equity?	Initial assessment (reflective) questions	Considerations for prioritization
<p>Table 2.2, Section 2: Quality supports (continued)</p>						
<p>Quality Rating and Improvement System (QRIS) participation by provider type</p>	<p>States have authority to use CCDF funds to develop and operate a Quality Rating and Improvement System.</p> <p>QRIS systems can target one or multiple types of child care providers, including licensed center-based and family child care providers, license-exempt providers, and a range of other program types.</p> <p><i>→CCDF Plan Section 7.3 (Quality Rating and Improvement System (QRIS) or Another System of Quality Improvement)</i></p>	<p>✓ Care must be high-quality, anti-bias, fostering of belonging</p>	<p>In many states, participation in QRIS can come with important benefits to participating providers, and the children they serve. Children benefit from provider participation in QRIS that fosters improved quality over time and adherence to high quality standards that are monitored over time. Also, participation in QRIS can open up important opportunities for providers (that in turn benefit the children they serve). For example, some states require QRIS participation to participate in CCDF; some states provide higher subsidy rates for higher quality providers (as discussed above).</p> <p>QRIS systems are largely voluntary, and there are often notable differences in participation by provider type, with center-based providers generally participating at higher rates. QRIS participation comes with many requirements and requires that providers invest time and money. Moreover, QRIS indicators may not equally recognize the unique attributes of all types of providers.</p> <p>When the providers that face higher barriers to QRIS participation are the same providers who serve children who face higher barriers to access to high-quality care, QRIS participation inequities can perpetuate inequities in access to quality care.</p>	<p>Lead Agencies can work to increase QRIS participation among providers serving children in racial/ethnic groups that face increased barriers to access to high-quality care.</p> <p>Child care service quality may become more equitable by removing or lowering barriers to QRIS participation (e.g. exclusionary participation criteria) and providing equitable supports that facilitate participation amongst providers of a range of types serving children and families with the lowest levels of access to high-quality care.</p>	<p>Are there restrictions on the types of providers that can participate in QRIS?</p> <p>Are any excluded provider types more likely to serve children of particular racial/ethnic/identity groups?</p> <p>What types of providers participate at the highest rates in QRIS?</p> <p>Are lower-participating provider types more likely to serve children of particular racial/ethnic/identity groups?</p>	<p>QRIS systems with broadly inclusive criteria for a range of provider types, and with intentional supports for providers may have less room for progress than QRIS systems that currently exclude large groups of providers that serve racial/ethnic groups of children with high barriers to access.</p> <p>Consider the feasibility of increasing QRIS participation among providers serving (or best positioned to serve) the highest-need groups of children. Different provider types may be more/less likely to participate in QRIS, even with encouragement/supports as some providers have more barriers to overcome.</p> <p>Consider: <i>If many of the non-participating providers are informal, family, friend, and neighbor care providers, what is the likelihood that participation can meaningfully be increased?</i></p>

CCDF Policy Lever	What is it?	Dimension of access	How does this lever relate to (in)equitable access and outcomes?	How could CCDF Lead Agencies use this lever to advance equity?	Initial assessment (reflective) questions	Considerations for prioritization
Table 22 Section 3: CCDF provider practices (provider equity)						
<p>Provider eligibility requirements for CCDF</p>	<p>CCDF Lead Agencies determine the CCDF eligibility criteria for providers—i.e., which providers are eligible to serve children supported by CCDF assistance, and what health and safety standards providers must meet.</p> <p>→CCDF Plan Section 5 (Establish Standards and Monitoring Processes to Ensure the Health and Safety of Child Care Settings)</p>	<p>✓ Care must be available and flexible</p>	<p>As described above, in some child care systems, usage of different provider types can differ systematically by child race/ethnicity.</p> <p>Usage patterns are less driven by differential preferences by race/ethnicity, and more driven by structural economic and housing inequities that lead to differences in the neighborhoods where children of different race/ethnicities live, what types of care are available nearby, and what work constraints their parents face.</p> <p>CCDF provider eligibility requirements shape the universe of providers that CCDF-supported children can use. If that universe is restricted in such a way that families of some racial/ethnic are less able to utilize child care assistance for care that meets their needs within a reasonable distance of home, then disparities in child care service provision will persist.</p>	<p>CCDF provider eligibility requirements may advance equity by facilitating the inclusion of quality providers serving children of racial/ethnic groups with low levels of access to affordable care. As noted above, quality can be a nuanced topic that requires a thoughtful, equitable approach.</p> <p>When more inclusive provider eligibility requirements differentially benefit children of these racial/ethnic groups, racial equity may be increased.</p>	<p>Are there restrictions on the types of providers that can participate in CCDF?</p> <p>Do some types of providers participate in CCDF at higher (lower) rates?</p> <p>Even if there are no formal exclusions, do participation requirements like background checks and health and safety requirements, create cost and logistical barriers that exclude some groups of providers?</p> <p>Do those types of providers serve racial/ethnic groups of children with lower access to affordable quality care?</p>	<p>This area may be of high priority for CCDF systems that exclude (even unintentionally) groups of providers that largely serve children in racial/ethnic groups facing higher barriers to access to affordable quality child care.</p> <p>Consider the feasibility of and resources available for supporting these providers in meeting CCDF requirements.</p>

CCDF Policy Lever	What is it?	Dimension of access	How does this lever relate to (in)equitable access and outcomes?	How could CCDF Lead Agencies use this lever to advance equity?	Initial assessment (reflective) questions	Considerations for prioritization
<p>Table 2.2 Section 3: CCDF provider practices (provider equity), continued</p>						
<p>Provider payment policies, waivers</p>	<p>CCDF Lead Agencies establish payment policies, including maximum rates, and rate setting practices (e.g., based on local market rates) or paying ‘fixed costs’ (e.g., absences).</p> <p>→CCDF Plan Section 4.3 (Establish Adequate Payment Rates), Section 4.4 (Implement Generally Accepted Payment Practices and Ensure Timeliness of Payments)</p>	<ul style="list-style-type: none"> ✓ Care must be flexible and available ✓ Care must be high-quality, anti-bias, fostering of belonging 	<p>Subsidy payment policies play a central role in shaping the supply of, quality of, and access to subsidized child care.</p> <p>Payment policies influence whether providers:</p> <ul style="list-style-type: none"> • Can and do participate in CCDF • Can sustain their businesses and livelihoods • Can provide stable child care arrangements over time • Can support the costs of providing high-quality care <p>Payment generosity, rate caps, tiered rates (see above), and administrative practices (i.e. how easy/hard it is for providers to get accurate and timely payments) all create incentives or barriers to provider participation in CCDF. Incentives and barriers are not always even or fair across providers serving different racial/ethnic groups of children.</p> <p>For example, payment policies often tie subsidy rates to local market rates, which may reflect how much families are able to pay rather than the cost of care. This can create a barrier to provider participation in CCDF if subsidy rates fail to cover the cost of care.</p> <p>Because children are racially segregated by neighborhood and community, local differences in subsidy rates could benefit providers in areas serving some racial/ethnic groups of children, while disadvantaging providers serving other groups. Specifically, providers in lower-price markets may receive less assistance to cover the costs of providing high-quality care.</p>	<p>Payment policies that intentionally aim to ensure even, balanced and fair incentives to providers of different types (center and home-based, for example), and across geographic and market areas across a CCDF jurisdiction may advance equity by breaking down barriers to CCDF provider participation that negatively impact some racial/ethnic groups, while benefiting others.</p>	<p>Do current payment policies create disparate barriers or uneven incentives for different groups of providers?</p> <p>Do these increased barriers/incentives have greater impact for providers serving children of particular racial/ethnic groups?</p>	<p>Consider availability of resources to increase generosity of subsidy payments and rate caps.</p> <p>Consider the capacity within administrative systems to make material changes to subsidy administrative practices such that barriers for providers would be reduced. Some Lead Agencies may have additional administrative capacity, while others may be restricted in their staff and resources to expand or improve administrative functions.</p>

CCDF Policy Lever	What is it?	Dimension of access	How does this lever relate to (in)equitable access and outcomes?	How could CCDF Lead Agencies use this lever to advance equity?	Initial assessment (reflective) questions	Considerations for prioritization
<p>Table 2.2 Section 3: CCDF provider practices (provider equity), continued</p>						
<p>Workforce development, diversity, and culturally responsive practice</p>	<p>CCDF Lead Agencies can use CCDF quality funds to support the training and development of the early childhood workforce.</p> <p>→CCDF Plan Section 6.3 (Supporting Training and Professional Development of the Child Care Workforce with CCDF Quality Funds)</p>	<p>✓ Care must be high-quality, anti-bias, fostering of belonging</p>	<p>The early childhood workforce is the backbone of the child care system. High-quality care requires a skilled and effective workforce.</p> <p>However, the early childhood workforce is undercompensated and undervalued in many jurisdictions, making recruitment, retention and supporting meaningful career pathways a challenge in many States, Territories and Tribal Areas (Vogtman, 2017).</p> <p>There are at least two ways these circumstances can perpetuate racial inequities:</p> <p>1) People of color and women are overrepresented in the early childhood workforce, and in lower-paying roles (within an already low-wage sector). This perpetuates family economic inequities for workers, the majority of whom have young children of their own (Gould & Essrow, 2015).</p> <p>2) If there are racial inequities in compensation, and access to support for training and professional development that disadvantage workers of color, this could disproportionately harm children of color (who are more likely to be served by workers of color) (Guzman et. al., 2018).</p>	<p>Prioritizing workforce equity can play an important role in creating more equitable access to higher-quality child care services for children of different race/ethnicities.</p> <p>Policies that use CCDF quality funds to affirmatively support groups of providers with lower access to fair wages, professional development and trainings, career pathways, and financial supports for pursuing training and advancement in the field may disproportionately benefit not only workers of color, but also children of color (who are disproportionately served by early childhood workers of color).</p> <p>Also, policies that ensure that the early childhood workforce are trained and supported to serve children and families of different race, ethnicities and cultures may advance equity by improving quality for all children, in particular quality of services for minoritized groups of children.</p>	<p>Are there groups of providers (by type of locality) with better/worse access to high-quality professional development opportunities, trainings, career pathways/ connections to local institutions of higher learning, and financial supports for advancing in the field?</p> <p>Are the groups of providers facing greater barriers more likely to be workers of color? Are the groups of providers facing greater barriers more likely to serve children of color or other groups of children facing increased barriers to access?</p>	<p>Consider whether there are opportunities to expand/build on existing programs and initiatives to offer professional development, training and additional financial supports (via higher wages, benefits, tuition supports) to additional segments of providers and workers.</p>

Section 3: Introduction to Equity Impact Assessments and Key Existing Resources

As previously stated, the purpose of this Toolkit is to provide T/TA providers with resources that can help them support CCDF Lead Agencies take steps towards conducting racial equity impact assessments related to their CCDF policies. In the preceding **Section 2 - Guide to key CCDF system factors for advancing equity** – we identified different aspects of CCDF policies that could be contributing to inequities, or alternatively, could be used to advance greater equity. In this section we identify existing resources for performing equity impact assessments.

The core purpose of a CCDF equity assessment is to examine whether and how the different components of the CCDF system (i.e., the policy levers) may be contributing to greater equity, or even contributing to inequities. Because there is no one “go-to” CCDF equity assessment resource, we provide a summary of the relevant tools and resources that can help T/TA providers facilitate planning and implementation of equity assessments by CCDF Lead Agencies. Based on a scan of existing tools, there are two sets of related, yet distinct types of equity assessments:

The goal of this section is to equip T/TA providers with resources to help move Lead Agencies from identifying priorities for equity assessments to planning for equity assessments.

- **Racial equity impact assessment (RE-IA):** “A systematic examination of how a proposed action or decision will likely affect different racial and ethnic groups. A useful tool for assessing the actual or anticipated effect of proposed policies, institutional practices, programs, plans and budgetary decisions. RE-IAs can be a vital tool to reduce, eliminate and prevent racial discrimination and inequities and prevent institutional racism.” (Casey, 2015).
- **Racial equity policy impact assessments (RE-PIA):** “Policy analysis methods that evaluate the effectiveness of policies and programs and analyze key policy components (intended goals, access to and quality of services, and impacts for different racial and ethnic groups), and that have an explicit emphasis on racial/ethnic equity or a policy’s impact on reducing racial/ethnic inequities in the population.” (Joshi et al., 2014).

These two types of assessments are related, but they are distinct in important ways. Racial equity (RE) impact assessments are not just about assessing policies. They provide generalized approaches for assessing RE impacts of a broad range of actions, including general organizational decision-making, organizational practices, and budget/business decisions. In contrast, RE policy equity assessments are policy-centric by design. They incorporate traditional policy analysis and assessment methods that embed an equity lens. An equity lens means going beyond evaluating policy efficiency and effectiveness, and examining equity **by systematically exploring what works, for whom, and under what conditions.**

Key insights from the review of existing racial equity assessment resources:

- 1 We find that **RE impact assessments** may be most useful for guiding the overall planning, framing and approach to an equity assessment, and will highlight best practices, like engagement of diverse stakeholders in all steps of the assessment. These tools may not go as deep into policy analysis methodologies needed to gather evidence of policy equity impacts, but can likely be conducted using existing agency capacity, and can yield valuable insights to support more equitable policy planning, evaluation, design and implementation.
- 2 **RE policy impact assessments** provide an in-depth policy analysis lens and methodology, but may lack the emphasis on goal setting, framing, consensus building, and diverse engagement practices that are of high value in the RE impact assessment tools. Undertaking an RE-PIA requires data, analytic, and research capacity.
- 3 **There are key existing resources to draw from that can help T/TA providers facilitate planning for a range of equity assessment activities by CCDF Lead Agencies with different levels of capacity and different end purposes.**

Table 3.1 below (see next page) presents a snapshot of Key Resources relevant to conducting RE impact assessments of CCDF policies. The first few resources offer frameworks, approaches, and methods for conducting assessments. The last three resources present findings from equity assessments of CCDF policies that contain relevant findings about how different CCDF policy levers may contribute to inequity or could be used to advance more equitable access to CCDF assistance and high-quality child care services.

Table 3.2 (immediately following Table 3.1) provides a description of each of the Key Resources discussing how each resource could inform CCDF Lead Agency planning for equity assessments, any key limitations, and describes whether the resource is oriented/helpful for examining future/proposed policies, existing policies, or both.

Table 3.1: Key Resources at a Glance

	Racial equity impact (RE-IAs) and racial equity policy impact (RE-PIAs) assessment frames/methods	Racial equity reviews/ analyses of CCDF policies
Annie E. Casey Race Equity & Inclusion Action Tools - 3 resources: <ul style="list-style-type: none"> Annie E. Casey Foundation (AECF) Race Equity and Inclusion Guide AECF: Using Racial Equity Impact Assessments for Effective Policymaking Center for the Study of Social Policy's REIA tool for assessing child welfare policies 	X (RE-IA)	
Policy Equity Assessment Tool (diversitydatakids.org)	X (RE-PIA)	
Children's Equity Project Early Childhood Equity Strategic Plan Template	X (RE-PIA)	
Urban Institute's CCDF Policy Equity Review		X
CLASP's Equity Starts Early Policy Review		X
Neighborhood-informed Early Childhood Policies (diversitydatakids.org)		X

Table 3.2: Detailed Table of Key Resources

Resource category	Resource type	Key Resource	Description	How is it helpful for RE-IA or RE-PIA of CCDF policies?	Main limitations	Helps examine future policies, existing, or both?
<p>RE (policy) impact assessment frameworks, rubrics, and methods</p>	<ul style="list-style-type: none"> RE impact assessment guide and framework 	<ul style="list-style-type: none"> Annie E. Casey Foundation (AECF) Race Equity and Inclusion Guide AECF: Using Racial Equity Impact Assessments for Effective Policymaking 	<ul style="list-style-type: none"> Racial equity impact assessments 101 Provides 7 steps to embed a race equity lens into organizational practice and policymaking (e.g., establish an understanding of race equity and inclusion principles) Provides case studies, examples of REIAs 	<ul style="list-style-type: none"> Provides high-level framework to inform goals, planning, and design of race equity impact assessments Provides guiding questions for framing a RE policy impact assessment in Step 6: Conduct Race Equity Impact Assessment for All Policies and Decision Making Provides definitions of key concepts and info about the value and purpose of REIAs Emphasizes best practices in assessment, including diverse engagement in all stages 	<ul style="list-style-type: none"> Generalized framework to inform planning and design, but not an assessment methodology Not specifically focused on <u>policy</u> (although policy is one part of it) 	<ul style="list-style-type: none"> Both

Table 3.2: Detailed Table of Key Resources (continued)

Resource category	Resource type	Key Resource	Description	How is it helpful for RE-IA or RE-PIA of CCDF policies?	Main limitations	Helps examine future policies, existing, or both?
RE (policy) impact assessment frameworks, rubrics, and methods (cont'd)	<ul style="list-style-type: none"> RE policy equity assessment rubric 	<ul style="list-style-type: none"> Center for the Study of Social Policy's REIA tool for assessing child welfare policies 	<ul style="list-style-type: none"> Assessment tool built on AECF Race and Inclusion Guide that is tailored to child welfare policy decision-making 	<ul style="list-style-type: none"> The assessment tool could be adapted to create a similar tool tailored specifically to CCDF 	<ul style="list-style-type: none"> Provides assessment steps and questions but is not an assessment methodology 	<ul style="list-style-type: none"> Both
	<ul style="list-style-type: none"> RE policy equity assessment framework and method 	<ul style="list-style-type: none"> Policy Equity Assessment (PEA) Tool, diversitydatakids.org 	<ul style="list-style-type: none"> Methodology for assessing a policy's impact on reducing racial/ethnic inequities in the population organized around three pillars: logic, capacity, effectiveness 	<ul style="list-style-type: none"> Provides a comprehensive methodology designed for this specific purpose (see OMB comment) Has applied examples that could serve as models to follow (e.g., Head Start, FMLA) 	<ul style="list-style-type: none"> Research-intensive to implement Does not cover RE-PIA best practices (goal-setting, diverse engagement) like REIAs do 	<ul style="list-style-type: none"> More often used for existing policies Could be used for future/proposed policies (see OMB comment)

Table 3.2: Detailed Table of Key Resources (continued)

Resource category	Resource type	Key Resource	Description	How is it helpful for RE-IA or RE-PIA of CCDF policies?	Main limitations	Helps examine future policies, existing, or both?
<p>RE (policy) impact assessment frameworks, rubrics, and methods (cont'd)</p>	<ul style="list-style-type: none"> RE <u>policy</u> equity assessment framework and method 	<ul style="list-style-type: none"> Children’s Equity Project: <u>Start with Equity – Early Childhood Equity Strategic Plan Template</u> 	<ul style="list-style-type: none"> Comprehensive assessment, planning, and monitoring tool for states and tribes for supporting more equitable ECE systems Organized around 14 key priorities (e.g., disseminate public funds equitably) for dismantling systemic racism in ECE (from <u>prior report</u> by same project) Emphasis is on comprehensive ECE mixed delivery system 	<ul style="list-style-type: none"> The assessment components of the tool (what they term “landscapes”) are the most relevant aspect of this tool. Tool introduces the method of “landscaping” – a streamlined process for scanning and identifying existing policies/data, rather than conducting in-depth policy assessments (may be an applicable approach for consideration) State/tribe policy and data questions under each of the 14 priorities could be analyzed to consider the federal CCDF policy levers most directly impacting states and tribes. 	<ul style="list-style-type: none"> Not specific to CCDF as the focus is on state ECE systems more broadly Relevant policy landscape questions would have to be adapted and linked to specific CCDF policy levers 	<ul style="list-style-type: none"> Both The focus of this tool is on assessment to support strategic planning It provides guidance on how to assess existing policies in ways that directly inform future planning/policies

Table 3.2: Detailed Table of Key Resources (continued)

Resource category	Resource type	Key Resource	Description	How is it helpful for RE-IA or RE-PIA of CCDF policies?	Main limitations	Helps examine future policies, existing, or both?
RE analyses/ equity reviews of CCDF policies	<ul style="list-style-type: none"> Policy review with equity lens 	<ul style="list-style-type: none"> Urban Institute’s 2021 Assessing Child Care Subsidies through an Equity Lens: A Review of 	<ul style="list-style-type: none"> In-depth review of the child care subsidy system through an equity lens Brings together what we know about how CCDF policies may differentially impact families on the basis of race/ethnicity Focus is on how states are implementing CCDF (via state policies and service delivery practices and implementation) and how that impacts equity 	<ul style="list-style-type: none"> Findings provide insights into dimensions of CCDF policies that could be the subject of a racial equity policy impact assessment. 	<ul style="list-style-type: none"> Not a comprehensive assessment tool or methodology 	<ul style="list-style-type: none"> Focus is examining existing policies Findings could inform policy proposals, but not a method for policy analysis (existing or future)
	<ul style="list-style-type: none"> Policy review with equity lens 	<ul style="list-style-type: none"> CLASP’s Equity Starts Early Addressing Racial Inequities in Child Care and Early Education Policy 	<ul style="list-style-type: none"> An equity review of the public ECE system in the U.S. including: CCDBG, Head Start, and State Pre-K Includes policy history analysis, patterns of differential access to ECE by race/ethnicity and nativity, and analysis of barriers 	<ul style="list-style-type: none"> The recommendations provide insights/direction into dimensions of CCDF policies that could be the subject of a racial equity policy impact assessment 	<ul style="list-style-type: none"> Not a comprehensive assessment methodology 	<ul style="list-style-type: none"> Focus is on examining existing policies Findings could inform policy proposals, but not a method for policy equity analysis

Table 3.2: Detailed Table of Key Resources (continued)

Resource category	Resource type	Key Resource	Description	How is it helpful for RE-IA or RE-PIA of CCDF policies?	Main limitations	Helps examine future policies, existing, or both?
RE analyses/ equity reviews of CCDF policies (cont'd)	<ul style="list-style-type: none"> Policy review with equity lens 	<ul style="list-style-type: none"> diversitydatakids.org's Advancing Racial Equity Through Neighborhood-informed Early Childhood Policies: A Research and Policy Review 	<ul style="list-style-type: none"> Policy review that examines how specific federal early childhood policies (including CCDF) currently account for children's neighborhood factors and related equity implications Describes how neighborhood-informed approaches could be used more to advance equity both within existing policies, or if policies were modified 	<ul style="list-style-type: none"> The 5 specific CCDF levers identified in the report, and the recommendations related to federal CCDF policies could serve as the subject of a racial equity policy impact assessment 	<ul style="list-style-type: none"> Not a comprehensive assessment tool or methodology Only addresses CCDF policy levers related to neighborhoods 	<ul style="list-style-type: none"> Focus is on examining existing policies Findings could inform policy proposals, but not a method for analysis of future or existing policies

Section 4: T/TA Equity Assessment Planning Facilitation Tool for Use with CCDF Lead Agencies

OCC recognizes that an important first step to advancing equity within the CCDF system is to provide Lead Agencies with the supports they need to plan for and conduct CCDF equity assessments.

There is a series of foundational steps that Lead Agencies can take to get on the path to conducting equity assessments as shown in Exhibit 4.1. below.

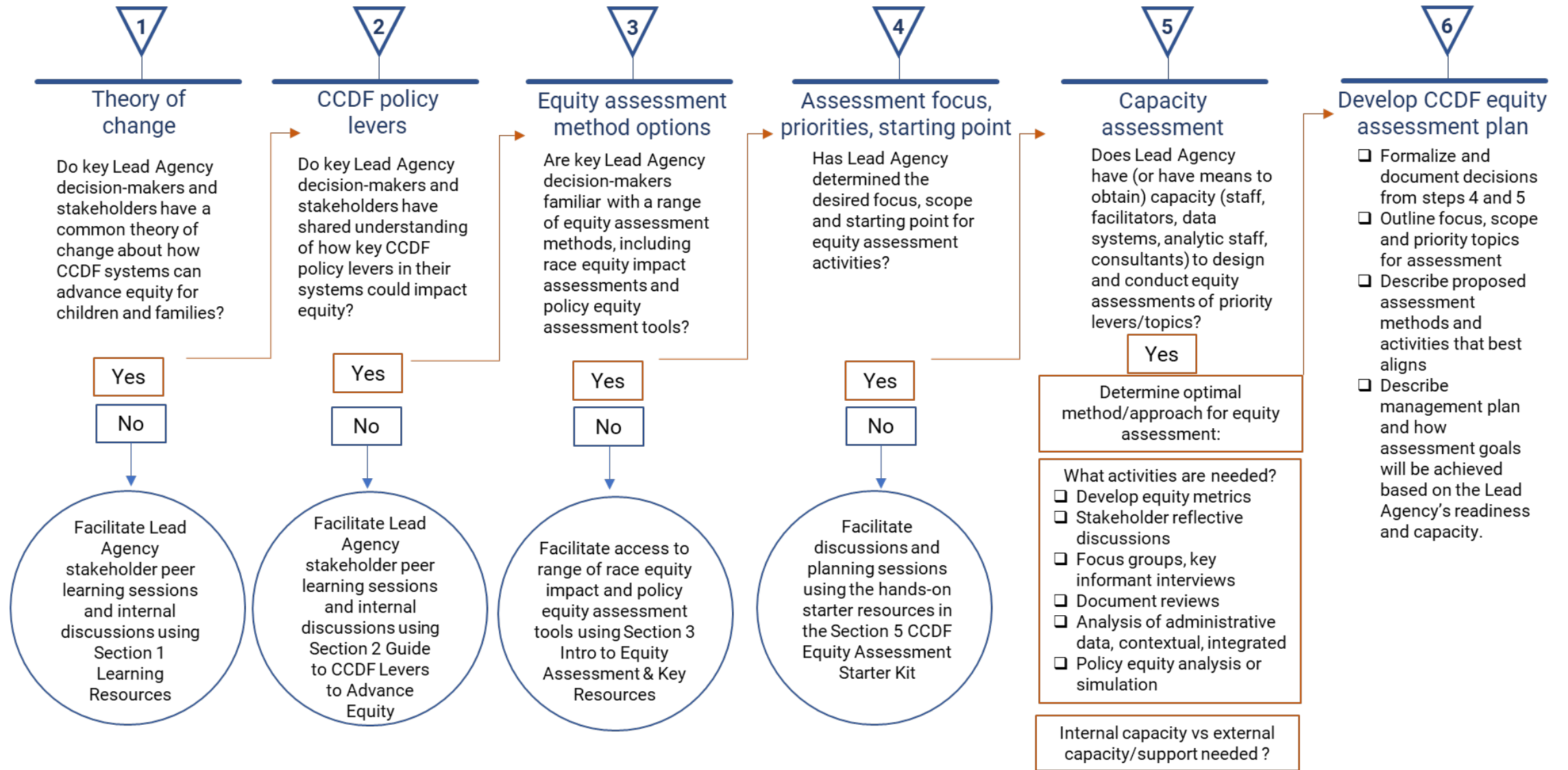
T/TA providers can support Lead Agencies at different points along the path, and also can help identify where Lead Agencies are right now – as Lead Agencies will be starting from different points, will have different capacities, priorities and goals, and will be operating in different policy and political contexts.

Exhibit 4.2. “Supporting Lead Agencies to take steps towards conducting CCDF equity assessments” (see next page) describes a series of key foundational steps that CCDF Lead Agencies can take to plan for and conduct equity assessments to inform better policies, practices and more equitable decision-making, and identifies opportunities in those foundational steps for T/TA providers to support CCDF Lead Agencies in taking these steps, meeting CCDF Lead Agencies where they are (understanding that will vary).

Exhibit 4.1. Steps toward conducting CCDF equity assessments

1	Theory of change	CCDF Lead Agency stakeholders have a shared theory of change about how CCDF systems can advance equity for children and families
2	CCDF policy levers	CCDF Lead Agency decision-makers have knowledge of how key CCDF policy levers in their system may impact equity
3	Equity assessment methods	CCDF Lead Agency decision-makers are familiar with a range of race equity impact assessment and policy equity assessment approaches along a continuum
4	Assessment focus, priorities, & starting point	CCDF Lead Agency has identified priorities for assessment related to key equity goals, and determined desired focus, scope and starting point for assessment
5	Capacity assessment	CCDF Lead Agency has evaluated its own capacity (staff, data systems, analytics) for conducting an equity assessment
6	CCDF equity assessment plan	CCDF Lead Agency has selected priority areas, assessment methods, activities and approaches, and outlined resources and capacity that will be used to conduct the assessment

Exhibit 4.2 Supporting Lead Agencies to take steps to conduct CCDF equity assessments



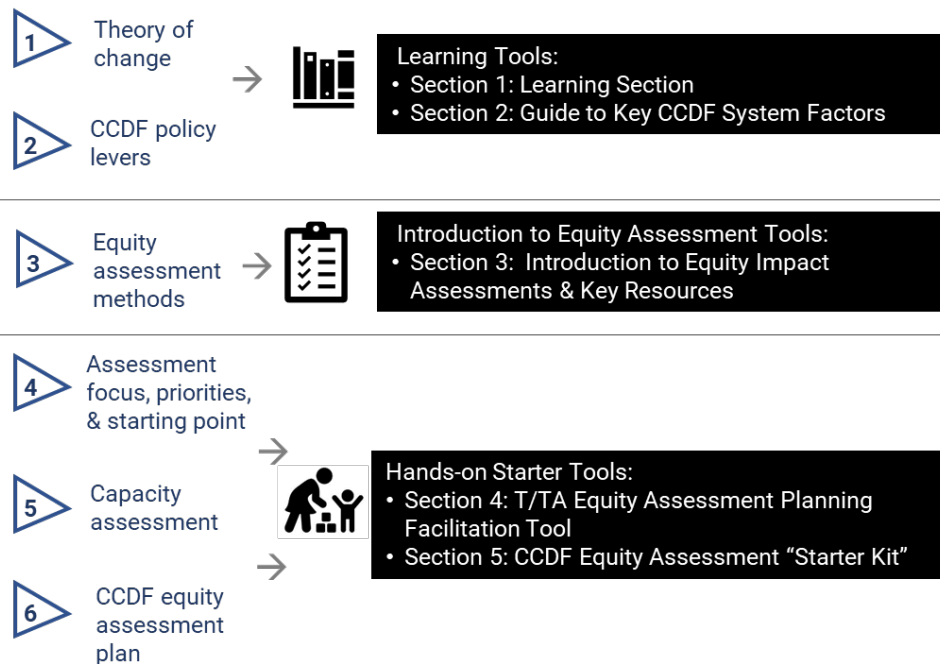
Section 5. CCDF Equity Assessment “Starter Kit”



This CCDF Equity Assessment “Starter Kit” is designed to equip T/TA providers with hands-on tools for working with Lead Agencies in the planning-to-action stages of conducting CCDF equity assessments (Exhibit 5.1: Steps 4, 5 and 6).

Starter Kit tools include a decision roadmap to help T/TA providers work with Lead Agencies to identify the focus, scope, and starting point for their CCDF equity assessment activities, and three accompanying starter tools designed to help T/TA providers support Lead Agencies in taking initial steps based on where they choose to start.

Exhibit 5.1 : Equity Assessment Steps → Related Toolkit Resources



Tools in the Starter Kit include:

- **Starter Tool 5.1: Equity Assessment Decision Roadmap** to help T/TA providers work with Lead Agencies to identify a focus, scope, and starting point for their CCDF equity assessment activities
- **Starter Tool 5.2: Assessing Equity in CCDF Outcomes - Three Key Indicators**
- **Starter Tool 5.3: Landscaping and Prioritizing Assessment of CCDF Policy Levers**
- **Starter Tool 5.4: Example equity assessment ideas/approaches for two selected CCDF policy levers**



Starter Tool 5.1: Equity Assessment Decision Roadmap

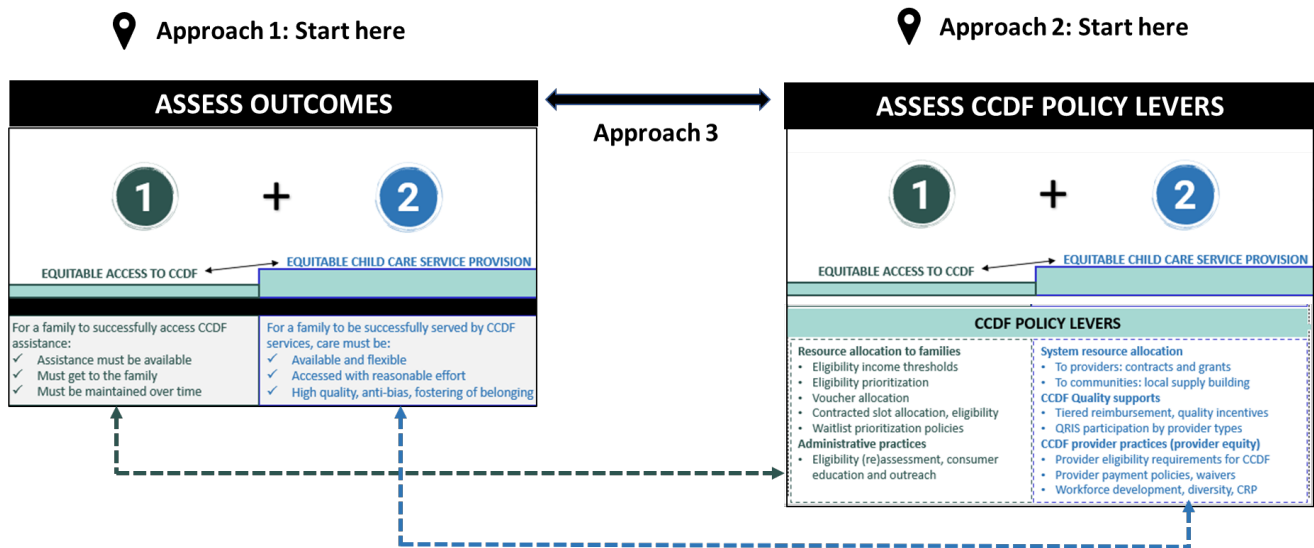
This tool is designed to help T/TA providers work with Lead Agencies to identify a focus, scope, and starting point for their CCDF equity assessment activities. Since there is no one “right” way to determine the appropriate focus, scope, and starting point for a CCDF equity assessment, many CCDF Lead Agencies may need support in considering where to start and how to take initial steps.

The theory of change described in Section 1 illustrates how specific CCDF policy levers relate to outcomes of interest in CCDF (namely, #1 - access to CCDF assistance and #2 - provision of quality child care services). CCDF equity assessments, described in Section 3, seek to understand and identify inequities in outcomes, and the factors within the CCDF system that may be contributing to inequities in outcomes or that could be used to advance greater equity in outcomes. However, there is no single entry or starting point for equity assessment (See Exhibit 5.1.1. below), nor is there a set scope or focus. Rather, the focus, priorities, and starting point are key first decisions that a Lead Agency needs to make in determining where to direct its equity assessment efforts.

For example, some Lead Agencies may be interested in conducting a comprehensive CCDF systemwide equity assessment that could include many components, including assessment of a range of policy outcomes, plus investigations of multiple CCDF policy levers that may relate to or contribute to equity in those outcomes. Another Lead Agency may be interested in assessing a specific outcome area (e.g., access to CCDF assistance, or access to high-quality child care and early education for families supported by assistance). Others may wish to start by examining a specific CCDF policy lever or set of levers, or even assessing proposed policies or practices they are considering implementing.

This resource describes three potential approaches to determining the starting point, focus, scope, and direction of a CCDF equity assessment, and identifies the resources in the Toolkit that T/TA providers could use to support Lead Agencies with taking first steps with each of these approaches. With this resource, T/TA providers can support Lead Agencies to choose the focus, scope, and starting point for their equity assessment activities, and from there, help CCDF Lead Agencies take initial steps towards conducting an assessment, depending on their chosen approach.

Exhibit 5.1.1. Inter-Relationship of Outcomes and Policy Levers & Contrasting Starting Points for CCDF Equity Assessments



Approach 1: Start by Assessing Equity in CCDF Outcomes



→ Related tools/resources:

- **Starter Tool 5.2: Assessing Equity in CCDF Outcomes – Three Key Indicators**

Assessing equity in CCDF-related outcomes can provide insights into:

- The ways that unmet need for CCDF assistance impacts different population groups
- Potential patterns of disparate access to CCDF assistance
- Disparate rates of usage of high-quality child care services

CCDF Lead Agencies may find it useful to examine one or multiple of these outcome areas to understand and identify inequitable outcomes that are present and/or persistent in their jurisdiction. Inequities in outcomes are a function of inequitable opportunities to access high-quality affordable child care for different groups of children and families.

Understanding patterns in outcomes can provide warning flags that CCDF systems can do more to advance equity. Analysis of outcomes can also provide a valuable baseline reference point for goal setting and monitoring over time, and also may provide clues about which CCDF policy levers may be high priority for assessment. For example, consider a scenario where there are no racial/ethnic differences in access to CCDF assistance, but usage of high-quality child care is unequal by race. Consider patterns in outcomes where White children supported by subsidies are much more likely to attend a high-quality provider than Black children supported by subsidies. These patterns in outcomes may encourage the Lead Agency to consider conducting an assessment of CCDF policy levers related to equitable provision of high-quality child care services.

It is important to note that assessing CCDF-related outcomes alone will not be sufficient to inform CCDF Lead Agencies' understanding of *which particular CCDF policy levers* could be used improve equity in particular outcomes. Rather, the Lead Agency would need to examine related CCDF policy levers to understand whether they are driving or contributing to disparate outcomes, and to assess how adjustments or use of different levers may advance greater equity.

See Starter Tool 5.2 in this Starter Kit for an overview of three key indicators related to CCDF policy outcomes that may be a helpful starting point for CCDF equity assessments.

Approach 2: Landscape and Prioritize Assessment of CCDF Policy Levers



→ Related tools/resources:

- **Starter Tool 5.3: Landscaping and Prioritizing Assessment of CCDF Policy Levers**
- **Starter Tool 5.4: Equity assessment ideas/approaches for two selected CCDF policy levers**

Equity assessments of CCDF policy levers provide insights into:

- The role of one or a set of CCDF policy levers in shaping equitable (or in some cases contributing to inequitable) outcomes
- Design and implementation features of particular policies and practices that could be adjusted/changed to create more equitable access and provision of services

CCDF Lead Agencies may find it useful to direct their equity assessment efforts towards examining a particular CCDF policy lever or set of levers. This could include CCDF policy levers that are already in

place or levers being considered for implementation. There may also be practical reasons for focusing an equity assessment on a particular CCDF policy lever. For example, consider a CCDF Lead Agency that is in the midst of implementing a new workforce development initiative supported by a recent investment. There may be ongoing policy initiatives or changes that may be ripe for equity assessment.

While there is no perfect science for choosing which CCDF policy lever (or set of levers) to assess, T/TA providers can use resources in the Toolkit and Starter Kit when working with CCDF Lead Agencies to facilitate a systematic planning and prioritization process.

Starter Tool 5.3—Landscaping and Prioritizing Assessment of CCDF Policy Levers—provides a worksheet that T/TA providers could use to facilitate discussions and planning sessions with CCDF Lead Agencies to help identify the most salient CCDF policy levers for equity assessment. This worksheet can provide a landscaping of the CCDF Lead Agency’s knowledge of how CCDF system factors relate to equity, and can help identify key considerations for prioritizing assessment of a specific CCDF policy lever (or set of levers).

Starter Tool 5.4—Equity assessment ideas for two selected CCDF policy levers— is also a relevant resource for CCDF Lead Agencies choosing to focus their equity assessment activities on specific CCDF policy levers. T/TA providers can use Starter Tool 5.4 to facilitate discussions and planning sessions with CCDF Lead Agencies interested in focusing on assessment of either of the selected policy levers highlighted in the resource, which include: *Eligibility Income Thresholds* (relates to equitable access to CCDF assistance through resource allocation strategies for families), and *Provider Eligibility Requirements for CCDF* (relates to equitable provision of quality child care services through provider-equity related strategies)

Approach 3: Comprehensive CCDF systemwide assessments



→ Related tools/resources:

- **Section 3: Introduction to Equity Assessments and Existing Key Resources**
- **Starter Tool 5.2: Assessing Equity in CCDF Outcomes – Three Key Indicators**
- **Starter Tool 5.3: Landscaping and Prioritizing Assessment of CCDF Policy Levers**

While assessments that follow either Approach 1 or Approach 2 have a specific focus and starting point, CCDF systemwide assessments incorporate many components to comprehensively assess a range of policy outcomes and to investigate multiple (or even all of the) CCDF policy levers that may relate to or contribute to equity in those outcomes. The starting point for these assessments may vary, sometimes starting with analysis of outcomes, and sometimes with analysis of policy levers, or even both simultaneously. The race equity impact assessment and policy equity assessment resources summarized in Section 3 of the Toolkit provide useful frameworks for conducting comprehensive systemwide assessments. Moreover, T/TA providers could use a combination of resources in the Toolkit and Starter Kit, in combination with the resources and methodologies in Section 3, to help CCDF Lead Agencies plan for and design a framework for a comprehensive systemwide equity assessment.



Starter Tool 5.2: Assessing Equity in CCDF Outcomes

This tool is intended to help T/TA providers work with CCDF Lead Agencies to identify outcomes of focus and develop key outcome indicators for assessing the state of equity issues in their CCDF systems.

In this starter tool, we present definitions and national data for three key CCDF outcome indicators related to equitable access and service provision in CCDF. These key indicators relate to three core equity issues discussed throughout the Toolkit, including:

- The ways that unmet need for CCDF assistance impacts different population groups
- Disparate access to CCDF assistance
- Disparate rates of usage of high-quality child care services

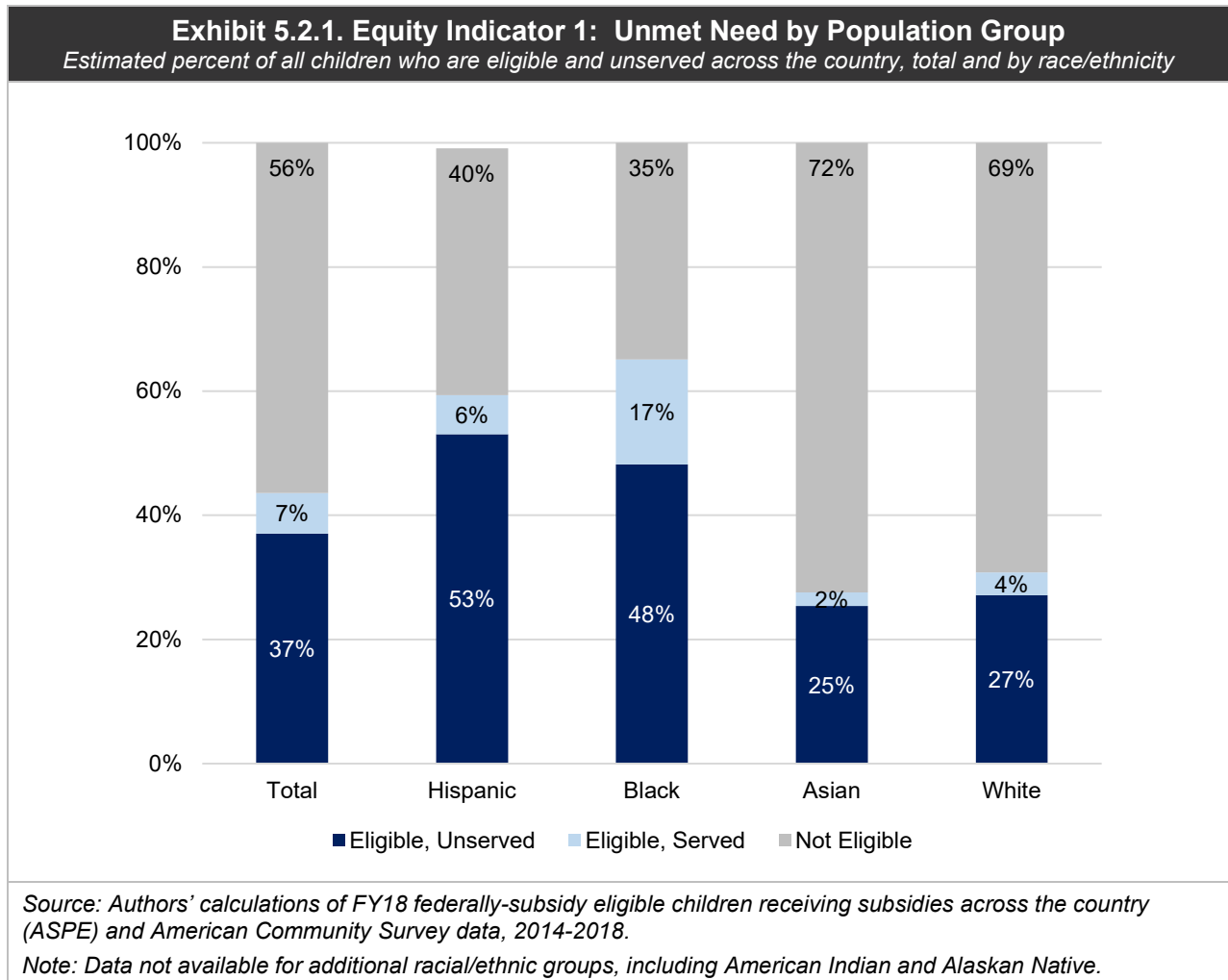
Disparities across any of these three areas may serve as a warning signal to Lead Agencies that the CCDF system could do more to advance equity. These indicators can also point the Lead Agency in the direction of highest priority and bring attention to groups of families and children negatively impacted by inequities within the CCDF system.

We provide definitions and explanations of these indicators below, and also show patterns in national data. CCDF Lead Agencies could develop similar indicators to examine equity issues using data specific to their jurisdiction.

[SEE NEXT PAGE]

Equity Indicator 1: Population Impacts of Unmet Need

In many States, Territories, and Tribal Areas there are working families with low incomes that are likely income-eligible and in need of CCDF assistance but are not served by CCDF. Equity is reached when all children and families have their needs met, and when there is an absence of disparities (i.e., harmful differences) in met need between population groups. It is therefore crucial to understand which population groups are negatively impacted *most* by high levels of unmet need in a particular State, Territory, or Tribal Area (as patterns are expected to vary place to place).



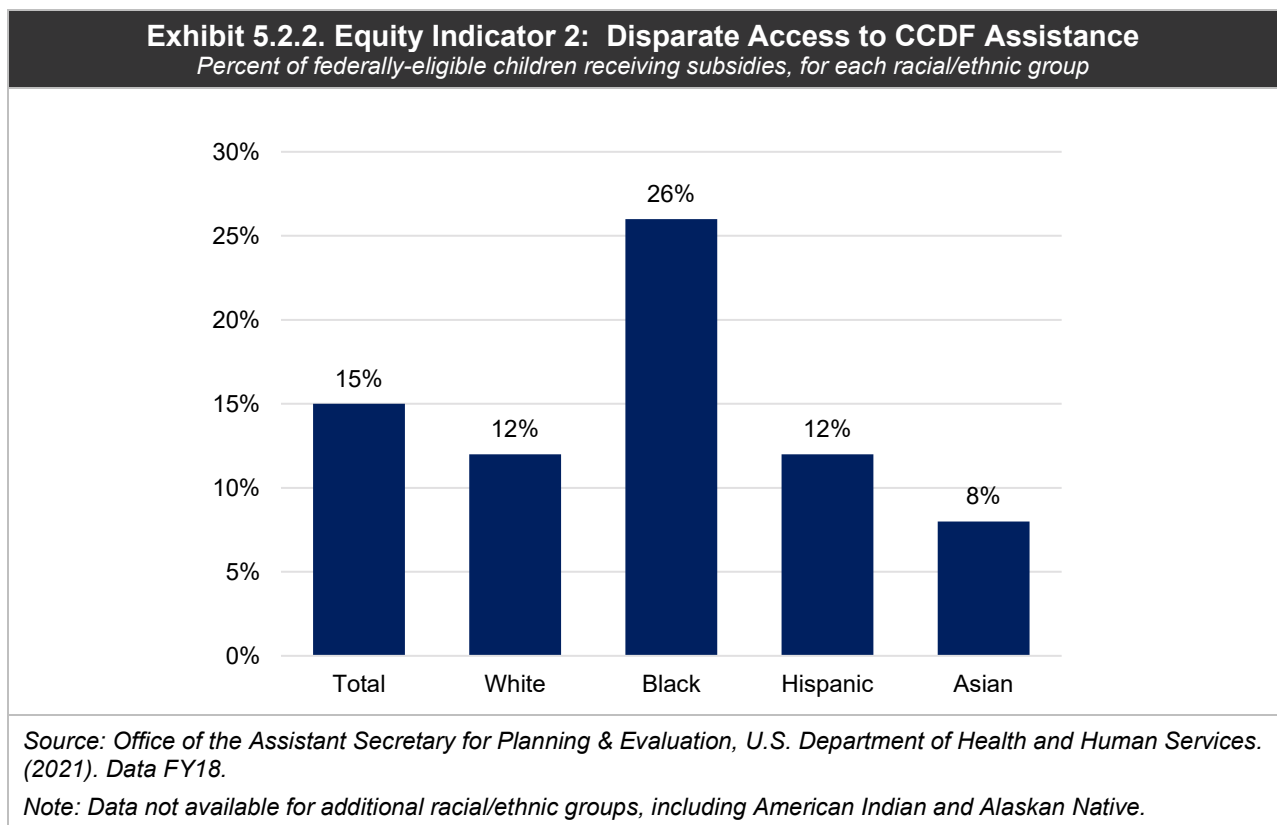
We define a key equity indicator (Equity indicator 1) of Unmet Need by Population Group as the percent of children who are likely income-eligible for CCDF assistance and not reached by CCDF assistance. Please note that the author who produced these estimates relied on federal eligibility rules rather than state-specific eligibility rules (for more information, please see Chien, 2019). Exhibit 5.2.1 shows that, nationally, the proportion of eligible children who receive CCDF assistance is much lower than the proportion of eligible children who do not receive assistance, yielding high levels of unmet need. Further, rates of unmet differ by group. About half of Hispanic and Black children are eligible but not served. (Note: these data are current as of fiscal year 2018 (FY18), prior to recent CCDBG funding expansions). Among White and Asian children, we see that 1 in 4 children are eligible and unserved. This compares to about 2 out of 4 Black and Hispanic children in the U.S., which is more than double the rate of White and Asian children.

This indicator reflects the racially unequal implications of underfunded programs at the population level. While this indicator presents data by racial/ethnic group for illustrative purposes, this indicator can be developed for other identity groups as well.

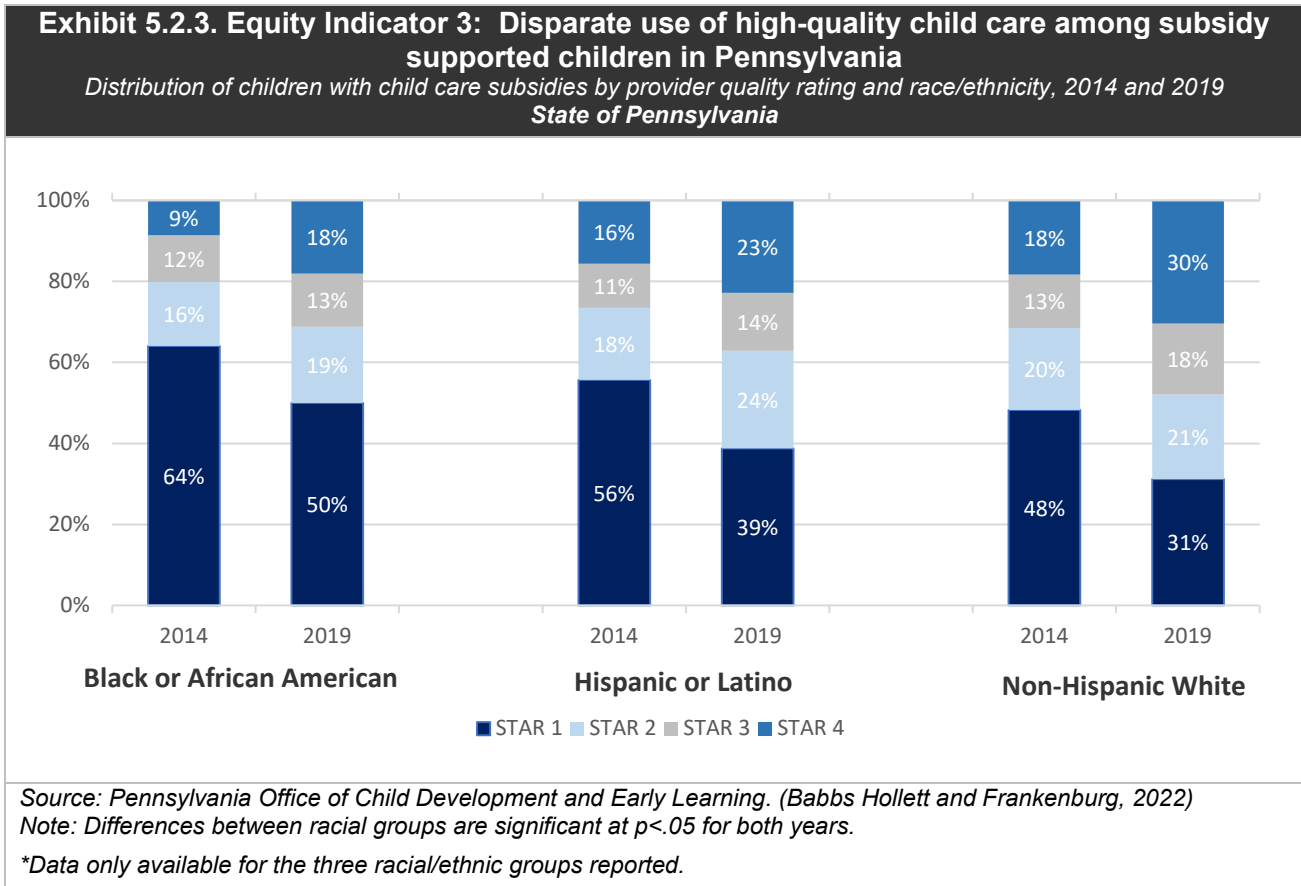
Equity Indicator 2: Disparate access to CCDF assistance

U.S. federal child care assistance policies have historically provided access to child care to no more than 15% of federally-eligible children (note: data current as of FY18, prior to recent CCDBG funding expansions). From a racial equity perspective, it is concerning that children of some racial and ethnic groups have even lower levels of access.

As Exhibit 5.2.2 shows, 15% of federally-eligible children in FY18 received child care subsidies. Rates of subsidy receipt are low across all groups, although they do vary by race/ethnicity: Roughly 12% of federally-eligible White and Hispanic children received subsidies in FY18 compared with 26% of Black children. Rates for Asian federally-eligible children were the lowest (8%).



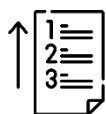
Equity Indicator 3: Disparate usage of high-quality care (among children in families with low incomes)



As outlined in the theory of change, equitable access to affordable high-quality child care and early education via the CCDF system requires not only equitable access to CCDF assistance, but equitable access to *high-quality* child care services that meet parents’ needs and support child development. While Equity Indicators 1 and 2 reflect issues of equity in access to CCDF assistance, this indicator examines the level of quality of child care services accessed by children in families with low incomes.

This example relies on data from the state of Pennsylvania to examine the distribution of children with child care subsidies using care with different quality levels (Star 1=lowest quality rating to Star 4=highest quality rating). While access to higher quality care improved for all groups between 2014 and 2019, in 2019, roughly 31% of Black children attended a Star 3 or 4 provider compared with 37% of Hispanic children and 48% of White children. Also, it is notable that half of Black children and nearly 40% of Hispanic children are with lower quality Star 1 providers, compared with less than one-third of White children (which is also a high share of White children in low income families, just relatively lower than for Black and Hispanic children).

High-quality child care may advance more equitable child developmental outcomes, making it essential that CCDF Lead Agencies not only track access to affordable child care and early education, but child care and early education that is both affordable *and* high-quality.



Starter Tool 5.3: Landscaping and Prioritizing Assessment of CCDF Policy Levers

Equity assessments of CCDF policy levers provide insights into:

- The role of one or a set of CCDF policy levers in shaping equitable (or in some cases contributing to inequitable) outcomes
- Design and implementation features of particular policies and practices that could be adjusted/changed to create more equitable access and provision of services

As explained in Starter Tool 5.1 (Equity Assessment Decision Roadmap), CCDF Lead Agencies may find it useful to direct their equity assessment efforts towards examining a particular CCDF policy lever, or set of levers. This could include CCDF policy levers that are already in place, or levers being considered for implementation. There may also be practical reasons for focusing an equity assessment on a particular CCDF policy lever

Starter Tool 5.1 also explains that while there is no perfect science for choosing which CCDF policy lever (or set of levers) to assess, T/TA providers can use the detailed guide provided in Section 2 of the Toolkit along with this starter tool when working with CCDF Lead Agencies to facilitate discussions and planning sessions with CCDF Lead Agencies to help identify the most salient CCDF policy levers for equity assessment.

This worksheet is designed to provide a guide for T/TA providers to support Lead Agencies with initial exploration and landscaping across CCDF policy levers, and to weigh different factors that may support decision-making about which lever or set of levers to focus their assessments on.

The tables below provide a summary of the key CCDF Policy Levers discussed in Section 2: Guide to Key CCDF Policy Levers to Advance Equity. These tables can be used by T/TA providers to help CCDF Lead Agencies as they build knowledge of how different CCDF policy levers may impact equitable outcomes, evaluate the potential for a particular lever to make positive change within their specific context/jurisdiction, determine highest priorities for assessment and investigation, and to organize thoughts and information related to responses to initial reflect assessment questions, and as they work through different considerations for prioritizing specific levers for assessment.

How to use the tables/worksheets: In Columns 1, 2, and 3, the goal is to record a summary assessment or score (low, medium, high) of the Lead Agency's knowledge of how the CCDF policy lever relates to equity, and the relevance or priority of a particular lever for advancing the equity goals of the agency. In Columns 4 and 5, the T/TA provider and/or CCDF Lead Agency can track notes from reflective discussions and learning sessions related to the various CCDF policy levers explained in detail in Section 2 of the Toolkit: Guide to Key CCDF Policy Levers to Advance Equity.

Lead Agencies that work through multiple levers in the worksheet will gain an initial landscape map of where their knowledge, interests, and priorities lie, which can inform planning and preparation for a CCDF equity assessment.

CCDF Policy Levers: Landscaping and Prioritization Worksheet

<div style="display: flex; align-items: center; justify-content: center;"> <div style="border: 2px solid black; border-radius: 50%; width: 40px; height: 40px; display: flex; align-items: center; justify-content: center; margin-right: 10px;"> 1 </div> <div> <h3 style="margin: 0;">EQUITABLE ACCESS TO CCDF</h3> </div> </div>						
		Record a self-assessment of where your Lead Agency falls in each of the following (you can use a scale such as Low, Medium, High)			Record notes from discussions of prompts in Section 2 (Guide to Levers)	
CCDF Policy Lever	Dimension of access	(1) Knowledge of how lever relates to equitable outcomes	(2) Potential for lever to advance CCDF Lead Agency's equity goals	(3) Priority for assessment	(4) Initial reflective questions	(5) Considerations for prioritization
Table 2.1 Section 1: Resource allocation to families						
Eligibility income threshold	✓ Assistance must get to the family					
Service prioritization	✓ Assistance must get to the family					
Voucher allocation	✓ Assistance must get to the family					
Contracted slots	✓ Assistance must get to the family					
Waiting list policies	✓ Assistance must get to the family					
Table 2.1 Section 2: Administrative practices and consumer information						
Consumer education and outreach	✓ Assistance must get to the family					
Administrative practices	✓ Assistance must get to the family ✓ Assistance must be maintained over time					

CCDF Policy Levers: Landscaping and Prioritization Worksheet

2

EQUITABLE CHILD CARE SERVICE PROVISION

		Record a self-assessment of where your Lead Agency falls in each of the following (you can use a scale such as Low, Medium, High)			Record notes from discussions of prompts in Section 2 (Guide to Levers)	
CCDF Policy Lever	Dimension of access	(1) Knowledge of how lever relates to equitable outcomes	(2) Potential for lever to advance CCDF Lead Agency's equity goals	(3) Priority for assessment	(4) Initial reflective questions	(5) Considerations for prioritization
Table 2.2 Section 1: System resource allocation						
To providers: contracts and grants	<ul style="list-style-type: none"> ✓ Care must be available and flexible ✓ Care must be high-quality, anti-bias, fostering of belonging 					
To communities: local supply-building	<ul style="list-style-type: none"> ✓ Care must be accessible with reasonable effort 					
Table 2.2 Section 2: Quality supports						
Tiered rates, quality incentives	<ul style="list-style-type: none"> ✓ Care must be high-quality, anti-bias, fostering of belonging 					
QRIS participation by provider type	<ul style="list-style-type: none"> ✓ Care must be high-quality, anti-bias, fostering of belonging 					

[TABLE CONTINUED ON NEXT PAGE]

		Record a self-assessment of where your Lead Agency falls in each of the following (you can use a scale such as Low, Medium, High)			Record notes from discussions of prompts in Section 2 (Guide to Levers)	
CCDF Policy Lever	Dimension of access	(1) Knowledge of how lever relates to equitable outcomes	(2) Potential for lever to advance CCDF Lead Agency's equity goals	(3) Priority for assessment	(4) Initial reflective questions	(5) Considerations for prioritization

Table 2.2 Section 3: CCDF provider practices (provider equity)

Provider eligibility requirements for CCDF	<ul style="list-style-type: none"> ✓ Care must be available and flexible 					
Provider payment policies, waivers	<ul style="list-style-type: none"> ✓ Care must be flexible and available ✓ Care must be high-quality, anti-bias, fostering of belonging 					
Workforce development, diversity, and culturally responsive practice	<ul style="list-style-type: none"> ✓ Care must be high-quality, anti-bias, fostering of belonging 					



Starter Tool 5.4: Example equity assessment ideas/approaches for two selected CCDF policy levers

This resource is intended to support T/TA providers in two different ways, including:

- (i) For T/TA providers working with Lead Agencies ready to begin assessments in either of two selected policy lever areas (Eligibility Income Thresholds or CCDF Provider Eligibility Requirements), this starter tool lays out ideas for a step-wise assessment process, and identifies data sources and methods that could be used to start conducting assessments of these two CCDF policy levers; and
- (ii) For T/TA providers working with Lead Agencies that are in the early planning stages of conducting equity assessments, these step-wise processes and approaches can serve as models or previews of the types of activities the Lead Agency may wish to undertake in connection with equity assessments of these or other CCDF policy levers. This can equip T/TA providers with useful information for helping Lead Agencies assess the capacity they would need and types of activities they may conduct related to an equity assessment.

Table 5.4.1 below provides starter steps for conducting an equity impact assessment of two CCDF policy levers:

- Eligibility Income Thresholds (a lever for expanding equitable access to CCDF assistance), and
- CCDF Provider Eligibility Requirements (a lever for expanding equitable access to quality child care services).

The table below outlines some key reflective questions that may be used to inform and guide planning, and the types of data sources and methods to consider in thinking through each of these questions. These are not exhaustive, rather they offer a starting point for thinking about next steps in an equity assessment for these two selected levers. These levers were selected as examples to help provide a more detailed picture of the types of activities and steps that may be involved in an equity assessment. These starter steps could be put to use by T/TA providers supporting Lead Agencies that are prioritizing these particular topics and have capacity to take initial steps. They can also be put to use by T/TA providers supporting Lead Agencies in the planning phases to consider parallel steps for equity assessments of other CCDF policy levers.

Note that the first section of the table is color coded green to correspond with #1 (Equitable access to CCDF assistance) in the theory of change (see Exhibit 1.1), and the second section is coded blue to corresponding with #2 (Equitable child care service provision).

Table 5.4.1: CCDF Equity Assessment Ideas/Approaches for Selected CCDF Policy Levers

CCDF Policy Lever	Dimension of access	Reflective questions	Related indicators and metrics	Data sources	Possible REI assessment ideas
Resource allocation to families					
Eligibility income thresholds	✓ Making assistance available to families in need	<ul style="list-style-type: none"> Do we have unmet need based on our existing threshold? 	<ul style="list-style-type: none"> Unmet need indicators based on current income threshold: Total income-eligible children served / estimated number of income-eligible children 	<ul style="list-style-type: none"> Total served: state administrative data or 801 data Total eligible: American Community Survey or Current Population Survey [e.g. Urban Institute TRIM]; CLASP/ KidsCount may have state level proxy measures available 	<ul style="list-style-type: none"> Race equity impact assessment ideas: Discuss reflective questions with key stakeholders, focus groups, gather perspectives; Assess availability of resources to implement a different income threshold. Policy equity assessment ideas: <ul style="list-style-type: none"> Analyze related indicators and metrics Conduct race equity policy impact assessment / simulation of raising the income threshold: What would the income threshold have to be for there to be no racial differences in unmet need?
		<ul style="list-style-type: none"> Do we believe there are families with low incomes above the current income threshold facing high affordability barriers? 	<ul style="list-style-type: none"> Child care cost burden indicators for families at different income levels: Percent of income families pay for child care (actual or projected) for families in income bands above the current income threshold 	<ul style="list-style-type: none"> Child care cost burden-estimated: Child care costs can be estimated based on local market prices using market rate survey data, and local median income data. Child care cost burden-actual: Actual household-level child care costs and income data can be collected in household surveys, and for some or all states may be available from state representative surveys (e.g. National Survey of Early Care and Education, Current Population Survey, Survey of Income Participation). 	
		<ul style="list-style-type: none"> Are there systematic group differences in affordability barriers? i.e. do some groups face more consistent and/or higher barriers? 	<ul style="list-style-type: none"> Cost burden indicators by race/ethnicity 	<ul style="list-style-type: none"> Child care cost burden-estimated: The estimated cost burden metrics above can be analyzed with local racial/ethnic population data. Note: These may provide information about descriptive local-level patterns, but are not based on household-level information. Child care cost burden-estimated: Estimate the cost burden metrics above for racial/ethnic and other population groups of interest. 	
		<ul style="list-style-type: none"> Are some groups more negatively affected overall by affordability challenges? 	<ul style="list-style-type: none"> Unmet need by race/ethnicity: Share of total group population that has a low income, facing high affordability barriers, and unreached by CCDF 	<ul style="list-style-type: none"> Calculate the percent of estimated income-eligible with estimated high cost burden served by CCDF. Denominator: Use child care cost burden estimates (household level) to estimate number of children/families likely income-eligible for CCDF with high cost burden (e.g. above 7% affordability threshold). Numerator: Number of children/families served, total and for racial/ethnic groups of interest. 	

CCDF Policy Lever	Dimension of access	Reflective questions	Related indicators and metrics	Data sources	Possible REI assessment ideas
CCDF provider practices (provider equity)					
Provider eligibility requirements for CCDF	<ul style="list-style-type: none"> ✓ Making care: • Available and flexible • Accessible with reasonable effort • High-quality, anti-bias 	<ul style="list-style-type: none"> • Which providers are eligible for CCDF (licensed-only? QRIS-participating only?) 	<ul style="list-style-type: none"> • Percent of children in families with low incomes estimated to be served by providers outside of the licensing/QRIS system 	<ul style="list-style-type: none"> • State surveys • NSECE state samples for large states • State administrative data • Qualitative information 	<p>Race equity impact assessment ideas:</p> <ul style="list-style-type: none"> • Use stakeholder discussions to consider how changing CCDF provider eligibility and requirements may increase subsidized child care capacity <p>Policy equity assessment ideas:</p> <ul style="list-style-type: none"> • If subsidy requires QRIS participation, assess the licensed capacity of including additional licensed providers in CCDF under different expanded eligibility criteria using state administrative data • If subsidy requires licensing, assess the capacity of including additional license-exempt or unlisted providers in CCDF (note: this is a challenge to measure)
		<ul style="list-style-type: none"> • Are there systematic group differences in children served by providers outside the CCDF/subsidy system? 	<ul style="list-style-type: none"> • Percent of children in families with low incomes estimated to be served by providers outside of the licensing/QRIS system by racial/ethnic group 	<ul style="list-style-type: none"> • State surveys • NSECE state samples for large states • Qualitative information 	<p>Policy equity assessment ideas:</p> <ul style="list-style-type: none"> • For additional licensed providers outside of QRIS, estimate expected benefits of CCDF eligibility for children of different racial/ethnic groups • For additional providers outside of licensing, estimate expected benefits for children of different race/ethnic groups (note: this is a challenge to measure)

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Appendix:

Key Resources to Support Racial Equity Impact Assessments of Federal CCDF Policies

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Table of Contents

Introduction	1
Purpose and Scope	1
Document Roadmap	2
Section 1. Organization of Key Resources	2
Section 2. Key Definitions	3
Section 3. Tables of Findings	5
Section 4a: SUMMARIES -- Racial Equity (Policy) Impact Assessments, Rubrics, Methods	14
Section 4b: SUMMARIES -- Racial Equity Policy Reviews & Analyses.....	23
Appendix A. Related Resources.....	27
Studies.....	27
Data Resources	27
Additional Racial Equity Impact Assessment Tools	28
Works Cited.....	29

Introduction

Purpose and Scope

In connection with its equity action plan under the Executive Order on Advancing Racial Equity, it is our understanding that the Office of Child Care (OCC) proposes to conduct a racial equity (RE) impact assessment of federal Child Care Development Fund (CCDF) policies.

While the science and practice of social policy equity impact analyses is a growing field, there is currently no established or standard set of policy equity analysis frameworks or methods that have been widely used in the field of early care and education policy, nor are there specific federal standards or requirements directing these assessments (OMB Report, 2021). Moreover, to our knowledge, to date there have been no agency- or researcher-led comprehensive racial equity impact assessments of federal CCDF policies similar to those conducted for other federal early childhood policies¹ (e.g., see a policy equity assessment of the federal Head Start program, Joshi et al., 2014).

In light of the lack of established methodologies available to OCC for this purpose, an early step for OCC in conducting a racial equity policy impact assessment is to develop a tailored approach, scope, and set of methods to meet the agency's goals. And while there is no "one-stop-shopping" tool that provides a comprehensive framework and set of methodologies tailored for this purpose, there are several high-value resources that can support OCC, the Administration for Children and Families (ACF), and the Office of Planning, Research & Evaluation (OPRE) to inform the planning, design, and ultimate implementation of a racial equity impact assessment of federal CCDF policies.

The purpose of this document is to

1. provide an overview of several high-value resources identified collectively by our team, our OCC, ACF and OPRE team members, and key informants,
2. categorize and describe each of these resources, and
3. detail how each resource is helpful (or limited) for informing planning, design and implementation of a racial equity impact assessment of federal CCDF policies.

¹ A recent comprehensive review of CCDF policies with an equity lens was conducted by the Urban Institute in 2021 with a primary focus on state CCDF policies and implementation factors, rather than an explicit focus on the CCDF federal regulatory structure. Given that state and federal policy structures are linked in CCDF, this Urban Institute CCDF review provides relevant insights for an assessment of federal CCDF policies, and is one of the key resources discussed in this memo.

Document Roadmap

This document is organized as follows:

In **Section 1** we describe how the 12 key resources are categorized and organized throughout this document.

In **Section 2** we provide definitions for key terms and concepts that will help the reader to better understand how each resource can be helpful (or limited) for informing planning, design, and implementation of a racial equity impact assessment of federal CCDF policies.

In **Section 3** we report our main findings in two tables as follows:

- **Table 1: Resources at a Glance** shows the titles of the 12 identified resources and indicates which category each resource falls under.
- **Table 2: Detailed table of key resources** provides additional information about each resource, including: a description, an explanation of why/how the resource is helpful for a RE policy impact assessment of CCDF policies, and notes on the limitations of each resource. We also note whether the resource addresses impacts on child/family outcomes², and whether the resource is helpful for analysis of existing policies, future (proposed) policies, or both.

In **Section 4**, we provide a series of short narrative summaries--one for each resource (except for the disparate policy access indicators for which summaries are not relevant). Please note that the page number for each resource's corresponding summary is listed in Table 1 "Resources at a Glance".

Section 1. Organization of Key Resources

For purposes of this memo, we have identified and summarized 12 key resources for supporting the planning, design and implementation of a racial equity policy impact assessment (RE-PIA) of federal CCDF policies. The list includes the following 3 categories of resources:

1. Indicators of disparate policy access related to CCDF policies
2. Racial equity (policy) impact assessment frameworks, rubrics, and methodologies
3. Racial equity analyses/equity reviews of CCDF policies

² We distinguish between resources that focus on assessing proximal policy impacts (e.g. access to CCDF services, CCDF resource allocation, stability of subsidy receipt) vs. more distal child and family outcomes (e.g. parental employment outcomes, child school readiness). A comprehensive RE policy impact assessment would ideally support analysis of specific policy factors that are directly linked to specific child and family outcomes, so we assess the extent to which existing resources identify these linkages, both conceptually and/or empirically.

Key definitions and concepts that help to explain these categories and how they relate to policy equity impact assessments of federal CCDF policies can be found in Section 2 “Key Definitions”.

We also provide a list of related resources that we have encountered in our searches thus far in Appendix A that fall into two additional categories:

- Equity-centered research studies relating to specific CCDF policies and practices (e.g., administrative practices), or specific racial/ethnic differences or groups (e.g. immigrant families).
- Data resources

Please note that a detailed description and explanation of each of these additional related resources is beyond the scope of this task. Therefore, the lists provided in Appendix A should be considered “starter lists” as they are not systematic or comprehensive. However, we wanted to include these as helpful additional resources that we have identified that may support later steps in an assessment process (e.g., literature review and/or data analyses).

Please note that we put “policy” in parentheses in the title of category 2 since some of the resources relate to general racial equity impact assessments (REIAs), and others are specifically focused on policy (RE-PIAs). We note whether the resource is a general REIA resource or a policy-focused resource in the “resource type” column. These definitional issues are explained more in Section 2, Key Definitions.

Section 2. Key Definitions

Racial equity policy impact assessment (RE-PIA): While there is no standard definition of this term, the two definitions below are closely related and together inform a definition of a racial equity policy impact assessment:

- **Racial equity impact assessment (REIA):** “A systematic examination of how a proposed action or decision will likely affect different racial and ethnic groups. A useful tool for assessing the actual or anticipated effect of proposed policies, institutional practices, programs, plans and budgetary decisions. REIAs can be a vital tool to reduce, eliminate and prevent racial discrimination and inequities and prevent institutional racism.” (Casey, 2015).
- **Racial equity policy equity assessments:** “Policy analysis methods that evaluate the effectiveness of policies and programs and analyze key policy components (intended goals, access to and quality of services, and impacts for different racial and ethnic groups), and that have an explicit emphasis on racial/ethnic equity or a policy’s impact on reducing racial/ethnic inequities in the population.” (Joshi et al., 2014).

These two types of assessments are related, but they are distinct in important ways. Racial equity impact assessments are not just about assessing policies. They provide generalized approaches for assessing RE impacts of a broad range of actions, including general organizational decision-making,

organizational practices, and budget/business decisions. In contrast, RE policy equity assessments are policy-centric by design. They incorporate traditional policy analysis and assessment methods that embed an equity lens.

Key insight from review of existing resources:

For purposes of a racial equity policy impact assessment of federal CCDF policies, we find that RE impact assessments may be most useful for guiding the overall planning, framing and approach to an assessment, and will highlight best practices, like engagement of diverse stakeholders in all steps of the assessment. These tools, however, may not go as deep into the policy analysis methodologies needed to gather evidence of policy equity impacts. RE policy impact assessments provide this in-depth policy analysis lens and methodology, but may lack the emphasis on goal setting, framing, consensus building and diverse engagement practices that are of high value in the RE impact assessment tools. Therefore, we find that multiple key resources offer specific valuable components that together could be used to shape a comprehensive approach to a RE policy impact assessments of federal CCDF policies.

Indicators of racially disparate policy access: Quantifiable measures that indicate potential systematic differential impacts of policies by race and ethnicity. For example, indicators of racially disparate participation in CCDF policies/programs amongst eligible children, or evidence of differential effectiveness of CCDF policies by race/ethnicity (e.g., systematic racial/ethnic differences in subsidized children’s access to high-quality child care).

These indicators can function as warning flags that provide signals about whether CCDF policies may be contributing (even if unintentionally) to inequities, and/or whether CCDF policies could do more to address equity. These are outputs/outcomes related to CCDF policies and are a first line of information for racial equity policy impact assessments as they may provide direction about which aspects of CCDF policies may shape or contribute to (in)equity. This definition also encompasses policy access indicators related to child care providers and the ECE workforce (e.g., wage disparities), and indicators that capture racial disproportionalities in need for CCDF policies (e.g., affordability disparities).

Equity: Equity is not about equal treatment, rather that all children have their individual needs met and are supported to reach their full potential, free from systematic unfair barriers, biases, or discrimination on the basis of race, ethnicity and other markers of identity. (diversitydatakids.org project).

Equitable access: The *absence* of systematic unfair disparities between population groups in access to opportunities for healthy development (diversitydatakids.org project).

Equitable policies address the ways that structural factors (e.g., segregation) shape both children’s access *and* their needs/opportunities differentially along racial/ethnic lines. There are two main dimensions to equitable CCDF policies (Urban Institute, 2021). Equitable CCDF policies:

- “Effectively offset systemic barriers that families face due to structural discrimination, and
- “Ensure equitable delivery and administration of services”

Section 3. Tables of Findings

Table 1. Resources at a glance

	Disparate policy access indicators	Racial equity (policy*) impact assessment frames/methods	Racial equity reviews/analyses	Summary page
Annual Fact Sheets: Estimates of Child Care Eligibility & Receipt (ASPE)	X			NA
Disparate Access to CCDF (CLASP)	X			NA
Child care affordability indicators (diversitydatakids.org)	X			NA
Undervalued - Child Care Workforce (National Women's Law Center)	X			NA
Annie E. Casey Race Equity & Inclusion Action Tools - 3 resources		X		14
Policy Equity Assessment Tool* (diversitydatakids.org)		X		16
OPRE Racial and Ethnic Disparities in Human Services (RED Project)*		X		18
OMB Methods and Leading Practices for Advancing Equity Report*		X		20
Children's Equity Project Early Childhood Equity Strategic Plan Template*		X		22
Urban Institute's CCDF Policy Equity Review			X	23
CLASP's Equity Starts Early Policy Review			X	25
Neighborhood-informed Early Childhood Policies (diversitydatakids.org)			X	25

*Asterisks denote policy-focused racial equity impact assessment resources. See discussion in Section 1 and definitions in Section 2 for additional explanation.

Table 2. Detailed table of key resources

Resource category	Resource type	Key Resource	Description	How is it helpful for REPIA of CCDF policies?	Main limitations
Indicators of disparate policy access	<ul style="list-style-type: none"> Data Findings 	<ul style="list-style-type: none"> ASPE Annual Fact Sheets: Estimates of Child Care Eligibility & Receipt, 2017 and 2018 	<ul style="list-style-type: none"> National estimates of % of federally-eligible children receiving CCDF subsidies by race/ethnicity (using Transfer Income Model, TRIM3) 	<ul style="list-style-type: none"> Provides national data and findings related to a key indicator of racially disparate access to CCDF subsidies 	<ul style="list-style-type: none"> No state estimates (but possible to calculate) Uses federal eligibility threshold rather than state specific criteria Does not disaggregate indigenous children
	<ul style="list-style-type: none"> Data Findings 	<ul style="list-style-type: none"> CLASP Disparate Access to Child Care Subsidies, 2016 and 2019 	<ul style="list-style-type: none"> National and state estimates of % of eligible children receiving CCDF subsidies by race/ethnicity 	<ul style="list-style-type: none"> Provides national and state data and findings related to a key indicator of racially disparate access to CCDF subsidies Examines both federal and state eligibility thresholds 	<ul style="list-style-type: none"> Uses American Community Survey microdata but not TRIM3, so estimates are less precise and not comparable with ASPE estimates
	<ul style="list-style-type: none"> Data Findings 	<ul style="list-style-type: none"> Child care affordability indicators and brief, diversitydatakids.org 	<ul style="list-style-type: none"> National and state estimates of % of working parents experiencing unaffordable child care (>7% threshold) by race/ethnicity 	<ul style="list-style-type: none"> Provides national and state data and findings related to racial disproportionality in need for child care subsidies 	<ul style="list-style-type: none"> Uses state child care prices based on market rate surveys as proxy for child care costs
	<ul style="list-style-type: none"> Data Findings 	<ul style="list-style-type: none"> UnderValued: Child care worker outcomes by race/ethnicity, National Women’s Law Center 	<ul style="list-style-type: none"> National estimates of disparate wage and poverty outcomes for child care workers by race/ethnicity 	<ul style="list-style-type: none"> Provides national data and findings related to racial disparities for child care providers and ECE workforce 	<ul style="list-style-type: none"> No state estimates (but may be possible to calculate)

Table 2. Detailed table of key resources (continued)

Resource category	Resource type	Key Resource	Description	How is it helpful for RE-PIA of CCDF policies?	Main limitations	Helps examine CCDF impacts on child/family outcomes?	Helps examine future policies, existing, or both?
<p>Racial equity (policy) impact assessment frameworks, rubrics, and methods</p>	<ul style="list-style-type: none"> RE impact assessment guide and framework 	<ul style="list-style-type: none"> Annie E. Casey Foundation (AECF) Race Equity and Inclusion Guide AECF: Using Racial Equity Impact Assessments for Effective Policymaking 	<ul style="list-style-type: none"> Racial equity impact assessments 101 Provides 7 steps to embed a race equity lens into organizational practice and policymaking Provides case studies, examples of REIAs 	<ul style="list-style-type: none"> Provides high-level framework to inform goals, planning, and design of race equity impact assessments Provides guiding questions for framing a RE policy impact assessment in Step 6: Conduct Race Equity Impact Assessment for All Policies and Decision Making Provides definitions of key concepts and info about the value and purpose of REIAs Emphasizes best practices in assessment, including diverse engagement in all stages 	<ul style="list-style-type: none"> Generalized framework to inform planning and design, but not an assessment methodology Not specifically focused on <u>policy</u> (although policy is one part of it) 	<ul style="list-style-type: none"> Child/family outcomes not the focus of REIAs Primarily focused on proximal policy impacts (e.g., access to services, resource allocation) REIAs are however flexible and could include child/family outcomes 	<ul style="list-style-type: none"> Both

Table 2. Detailed table of key resources (continued)

Resource category	Resource type	Key Resource	Description	How is it helpful for RE-PIA of CCDF policies?	Main limitations	Helps examine CCDF impacts on child/family outcomes?	Helps examine future policies, existing, or both?
Racial equity (policy) impact assessment frameworks, rubrics, and methods (cont'd)	• RE policy equity assessment rubric	• Center for the Study of Social Policy's REIA tool for assessing child welfare policies	• Assessment tool built on AECF Race and Inclusion Guide that is tailored to child welfare policy decision-making	• The assessment tool could be adapted to create a similar tool tailored specifically to CCDF	• Provides assessment steps and questions but is not an assessment methodology	• Focused on proximal policy impacts	• Both
	• RE policy equity assessment framework and method	• Policy Equity Assessment (PEA) Tool, diversitydatakids.org	• Methodology for assessing a policy's impact on reducing racial/ethnic inequities in the population organized around three pillars: logic, capacity, effectiveness	<ul style="list-style-type: none"> • Provides a comprehensive methodology designed for this specific purpose (see OMB comment) • Has applied examples that could serve as models to follow (e.g. Head Start, FMLA) 	<ul style="list-style-type: none"> • Research intensive to implement • Does not cover RE-PIA planning steps and best practices (goal-setting, diverse engagement) like REIAs do 	<ul style="list-style-type: none"> • Focused on proximal policy impacts <i>and</i> distal child/family outcomes. • Child/family outcomes are a focus of the research effectiveness dimension • See Head Start PEA • However, focus is not on linking specific policy components to child/family outcomes 	<ul style="list-style-type: none"> • More often used for existing policies • Could be used for future/ proposed policies (see OMB comment)

Table 2. Detailed table of key resources (continued)

Resource category	Resource type	Key Resource	Description	How is it helpful for RE-PIA of CCDF policies?	Main limitations	Helps examine CCDF impacts on child/family outcomes?	Helps examine future policies, existing, or both?
<p>Racial equity (policy) impact assessment frameworks, rubrics, and methods (cont'd)</p>	<ul style="list-style-type: none"> RE policy equity assessment framework and method 	<ul style="list-style-type: none"> Racial and Ethnic Disparities in Human Services (RED) project: Identifying Racial and Ethnic Disparities in Human Services: A Conceptual Framework and Literature Review 	<ul style="list-style-type: none"> Conceptual framework for identifying disparities by race and ethnicity throughout the service delivery pathway designed around 6 ACF programs, including CCDF. 	<ul style="list-style-type: none"> Useful for designing an analytic framework for a CCDF RE-PIA Framework could provide a model for identifying linkages between federal policy levers, points in the service delivery pathway where disparities can emerge, and child/family outcomes Also synthesizes CCDF empirical research and findings related to disparate policy access by race/ethnicity 	<ul style="list-style-type: none"> Not a comprehensive policy analysis methodology Empirical findings do not point to specific dimensions of federal CCDF policy Would require using framework to conceptually link child/family outcomes to points in the human services delivery path and then to federal policy levers 	<ul style="list-style-type: none"> This resource is the most relevant for examining CCDF impacts on child/family outcomes Provides detailed conceptual model linking policy and service delivery points to child/family outcomes Provides literature review on CCDF policy factors and child/family impacts 	<ul style="list-style-type: none"> Primary focus is on existing policies Could be used to develop analysis plan for policy impact simulations, (see examples: Acevedo et al., 2021, and National Academies of Sciences, 2019)

Table 2. Detailed table of key resources (continued)

Resource category	Resource type	Key Resource	Description	How is it helpful for RE-PIA of CCDF policies?	Main limitations	Helps examine CCDF impacts on child/family outcomes?	Helps examine future policies, existing, or both?
Racial equity (policy) impact assessment frameworks, rubrics, and methods (cont'd)	<ul style="list-style-type: none"> Review of racial equity policy impact assessment methods 	<ul style="list-style-type: none"> OMB July 2021 Report: Study to Identify Methods to Assess Equity: Report to the President 	<ul style="list-style-type: none"> OMB study obligated by the Biden EO intended to review methods and approaches to inform a broad spectrum of topics relevant for developing a comprehensive federal-government-wide equity agenda. Very broad report that covers more than policy assessments and takes a lens of agency operations, systems, and service delivery 	<ul style="list-style-type: none"> Cites some relevant resources for this purpose (also includes resources beyond this scope) Includes some of the key resources identified for this list (i.e., provides confirmatory value) Indicates that ASPE may release a pilot REIA tool for government/philanthropy based on results of an environmental scan (may warrant follow-up with ASPE) 	<ul style="list-style-type: none"> Not a framework or method Does not identify a specific approach for a RE-PIA for federal policies Focus is broader than policy focused on agency operations, monitoring, etc. and does not provide a systematic review of policy analysis tools. 	<ul style="list-style-type: none"> N/A 	<ul style="list-style-type: none"> Identifies resources suited for examining both

Table 2. Detailed table of key resources (continued)

Resource category	Resource type	Key Resource	Description	How is it helpful for RE-PIA of CCDF policies?	Main limitations	Helps examine CCDF impacts on child/family outcomes?	Helps examine future policies, existing, or both?
<p>Racial equity (policy) impact assessment frameworks, rubrics, and methods (cont'd)</p>	<ul style="list-style-type: none"> • RE policy equity assessment framework and method 	<ul style="list-style-type: none"> • Children’s Equity Project: Start with Equity – Early Childhood Equity Strategic Plan Template 	<ul style="list-style-type: none"> • Comprehensive assessment, planning, and monitoring tool for states and tribes for supporting more equitable ECE systems • Organized around 14 key priorities for dismantling systemic racism in ECE (from prior report by same project) • Emphasis is on comprehensive ECE mixed delivery system 	<ul style="list-style-type: none"> • The assessment components of the tool (what they term “landscapes”) are the most relevant aspect of this tool. • Tool introduces the method of “landscaping” – a streamlined process for scanning and identifying existing policies/data, rather than conducting in-depth policy assessments (may be an applicable approach for consideration) • State/tribe policy and data questions under each of the 14 priorities could be analyzed to consider the federal CCDF policy levers most directly impacting states and tribes. 	<ul style="list-style-type: none"> • Geared towards states and tribes, so has more limited applicability for a federal policy assessment • One of the only resources to specifically address tribes • Not specific to CCDF as the focus is on state ECE systems more broadly • Relevant policy landscape questions would have to be adapted and linked to specific federal CCDF policy levers 	<ul style="list-style-type: none"> • Focus is primarily on proximal policy outcomes 	<ul style="list-style-type: none"> • Both • The focus of this tool is on assessment to support strategic planning • It provides guidance on how to assess existing policies in ways that directly inform future planning/policies

Table 2. Detailed table of key resources (continued)

Resource category	Resource type	Key Resource	Description	How is it helpful for RE-PIA of CCDF policies?	Main limitations	Helps examine CCDF impacts on child/family outcomes?	Helps examine future policies, existing, or both?
Racial equity analyses/ equity reviews of CCDF policies	• Policy review with equity lens	• Urban Institute’s 2021 Assessing Child Care Subsidies through an Equity Lens: A Review of	<ul style="list-style-type: none"> • In-depth review of the child care subsidy system through an equity lens • Brings together what we know about how CCDF policies may differentially impact families on the basis of race/ethnicity • Focus is on how states are implementing CCDF (via state policies and service delivery practices and implementation) and how that impacts equity 	• Findings provide insights into dimensions of federal CCDF policies that could be the subject of a racial equity policy impact assessment.	<ul style="list-style-type: none"> • Not a comprehensive assessment tool or methodology • Provides more assessment guidance for state level policy equity analyses than federal 	• Focused on proximal policy impacts, not child/family outcomes	<ul style="list-style-type: none"> • Focus is examining existing policies • Findings could inform policy proposals, but not a method for policy analysis (existing or future)
	• Policy review with equity lens	• CLASP’s Equity Starts Early Addressing Racial Inequities in Child Care and Early Education Policy	<ul style="list-style-type: none"> • An equity review of the public ECE system in the U.S. including: CCDBG, Head Start, and State Pre-K • Includes policy history analysis, patterns of differential access to ECE by race/ethnicity and nativity, and analysis of barriers 	• The federal, CCDF-specific recommendations provide insights/direction into dimensions of federal CCDF policies that could be the subject of a racial equity policy impact assessment	<ul style="list-style-type: none"> • Not a comprehensive assessment methodology • CCDF-specific recommendations would need to be mapped onto dimensions of federal CCDF policies 	• Focused on proximal policy impacts, not child/family outcomes	<ul style="list-style-type: none"> • Focus is on examining existing policies • Findings could inform policy proposals, but not a method for policy analysis

Table 2. Detailed table of key resources (continued)

Resource category	Resource type	Key Resource	Description	How is it helpful for RE-PIA of CCDF policies?	Main limitations	Helps examine CCDF impacts on child/family outcomes?	Helps examine future policies, existing, or both?
Racial equity analyses/ equity reviews of CCDF policies (cont'd)	<ul style="list-style-type: none"> Policy review with equity lens 	<ul style="list-style-type: none"> diversitydatakids.org's Advancing Racial Equity Through Neighborhood-informed Early Childhood Policies: A Research and Policy Review 	<ul style="list-style-type: none"> Policy review that examines how specific federal early childhood policies (including CCDF) currently account for children's neighborhood factors and related equity implications Describes how neighborhood-informed approaches <i>could</i> be used more to advance equity both within existing policies, or if policies were modified 	<ul style="list-style-type: none"> The 5 specific CCDF levers identified in the report, and the recommendations related to federal CCDF policies could serve as the subject of a racial equity policy impact assessment 	<ul style="list-style-type: none"> Not a comprehensive assessment tool or methodology Only addresses CCDF policy levers related to neighborhoods 	<ul style="list-style-type: none"> Focused on proximal policy impacts, not child/family outcomes 	<ul style="list-style-type: none"> Focus is on examining existing policies Findings could inform policy proposals, but not a method for analysis of future or existing policies

Section 4a: SUMMARIES -- Racial Equity (Policy) Impact Assessments, Rubrics, Methods

(1a) Annie E Casey Race Equity and Inclusion Guide, 2014:

https://assets.aecf.org/m/resourcedoc/AECF_EmbracingEquity7Steps-2014.pdf

The Annie E. Casey Foundation. (2014). Race Equity and Inclusion Guide. Baltimore, MD: Annie E. Casey Foundation. Retrieved from www.aecf.org.

This guide includes “7 steps to advance and embed race equity” and focuses on how to embed a race equity lens into organizational practice and policymaking, serving as an introduction and overview to many of the key foundational concepts, processes and questions that would shape a racial equity policy impact assessment—i.e., it is a Race Equity Impact Assessment “101”.

The components of this guide that are most relevant to informing a racial equity policy impact assessment of federal CCDF policies include the following:

- Core concepts (pp. 7) – definitions of equity, systematic equity, inclusion, racial justice, race, racism, internalized racism, interpersonal/institutional racism, structural racism, systematic racialization, equality vs. equity.
- Step 6: Conduct Race Equity Impact Assessment for All Policies and Decision Making-includes 5 guiding questions to help inform the design of a racial equity policy impact assessment:

Race Equity Impact Assessment

These questions can help you begin your race equity impact assessment.

1. Are all racial and ethnic groups that are affected by the policy, practice or decision at the table?
2. How will the proposed policy, practice or decision affect each group?
3. How will the proposed policy, practice or decision be perceived by each group?
4. Does the policy, practice or decision worsen or ignore existing disparities?
5. Based on the above responses, what revisions are needed in the policy, practice or decision under discussion?

Source: [Annie E. Casey Race Equity and Inclusion Guide](https://assets.aecf.org/m/resourcedoc/AECF_EmbracingEquity7Steps-2014.pdf)

(1b) Annie E Casey Using Racial Equity Impact Assessments for Effective Policymaking, 2016

Website: <https://www.aecf.org/resources/tools-for-thought-a-race-for-results-case-study>

This guide goes somewhat more deeply into conducting racial equity impact assessments to inform policymaking specifically, and provides case studies of organizations that have used this approach.

(1c) Application of Annie E. Casey’s Race Equity Inclusion Guide by the Center for the Study of Social Policy to develop a race equity impact assessment framework for Child Welfare policies

<https://cssp.org/wp-content/uploads/2018/08/Race-Equity-Impact-Assessment-Tool.pdf>

In this resource, the Center for the Study of Social Policy (CSSP) adapted the Annie E. Casey Race Equity Inclusion Guide to create to develop an assessment tool that is tailored to child welfare policy decision-making. This tool was intended to be used by child welfare decision makers when developing new policy proposals or considering modifications to existing policies.

It lays out a checklist/detailed series of questions organized under 8 overarching categories:

1. Have you identified the racial/ethnic groups in your jurisdiction?
2. For this policy/program/practice, what results are desired, and how will each group be affected?
3. What does the data say about different racial and ethnic groups?
4. Are all racial and ethnic groups that are affected by the policy, practice or decision at the table?
5. How will the proposed policy, practice or decision affect each group?
6. How will the proposed policy, practice or decision be perceived by each group?
7. Does the policy, practice or decision worsen or ignore existing disparities?
8. Based on the above responses, what revisions are needed in the policy, practice or decision under discussion?

The same way that CSSP adapted the Casey tool for Child Welfare policymaking, it would be feasible to create a tailored tool that is similar for CCDF policies.

Takeaways from the Annie E Casey Tools

Key Contributions: These tools could be helpful as framing tools to inform the planning, design and scope of a racial equity policy impact assessment of federal CCDF policies. They could also be useful for developing an assessment process that includes best practices, e.g., diverse engagement in all steps of the assessment process. It can also be used to outline a process that could support consensus building and understanding within the agency about the purpose and value of racial equity impact assessments, and to help foster consensus about the approaches being used (which in turn may support buy-in for applying the results of the assessment for more equitable policy decision-making).

Limitations: These tools are “high level” and generalized by design. This means that while they offer a general framework and help to inform the different components and steps of a racial equity impact assessment, they not specifically designed for in-depth equity analyses of policy impacts, per se (although policy is part of it). They are also not designed for the purpose of assessing child care policies specifically. So, they could be very helpful foundational tools to inform design and planning, but do not offer a specific framework that can be directly applied to CCDF policies, nor do they provide a detailed methodological roadmap/guidance for conducting racial equity policy impact assessment of federal CCDF policies.

(2) Policy Equity Assessment (PEA) Tool, Joshi et al., (2014).

Public comment prepared for Office of Management and Budget in reference to 2021: Racial Equity Executive Order: <https://www.diversitydatakids.org/research-library/policy-equity-assessment/methods-and-leading-practices-advancing-equity-and>

Rubric: <https://www.diversitydatakids.org/policy-equity-assessments>

Peer-review journal article: <https://www.diversitydatakids.org/research-library/policy-equity-assessment/integrating-racial-equity-and-policy-improve-child-health>

Applied PEA of Head Start: <https://www.diversitydatakids.org/research-library/policy-equity-assessment/policy-equity-assessment-head-start>

The developers of the Policy Equity Assessment tool submitted a comment for the Office of Management and Budget (see link above) on effective methods for assessing whether federal agencies' policies equitably serve all eligible individuals and communities, particularly the underserved. The comment provides a helpful, concise explanation of the utility of the PEA tool, and explains how it could be used exactly for the purpose of conducting racial equity policy impact assessments of federal policies.

From the tools' website, here is the author's description of the Policy Equity Assessment tool: "diversitydatakids.org developed the Policy Equity Assessment (PEA) to assist analysts and researchers as they evaluate the impact of policies and programs on racial/ethnic equity. The PEA framework embeds racial/ethnic equity within each policy assessment step and guides analysts to move beyond asking whether a policy is working as intended to ask instead whether the policy reduces racial/ethnic gaps in outcomes. The PEA emphasizes significant differences by race/ethnicity in access to and quality of services and policy impacts on reducing racial/ethnic disparities."

The PEA tool has three stages guided by key questions:

- Logic: Does the policy set explicit/implicit goals to address racial/ethnic gaps?
- Capacity: Does the policy have the capacity to meet the needs of the overall eligible population and those of each racial/ethnic subgroup?
- Research evidence: Is the policy effective for racial/ethnic subgroups, and does it reduce inequities?

On the diversitydatakids.org website, there is a 3-part rubric that lays out the PEA steps and equity-focused questions. A screenshot of logic is below.

PEA steps and equity-focused questions

Logic	Capacity	Research evidence
Policy Assessment Steps	Equity-Focused Questions	
Historical context	<ul style="list-style-type: none"> • Are racial/ethnic disparities considered in the policy's justification and development? • Does the policy change over time to address any documented racial/ethnic exclusionary practices or barriers to participation? 	
Primary purpose and other goals	<ul style="list-style-type: none"> • Are racial/ethnic disparities discussed in the policy's targeted outcomes? • Is discrimination against particular racial/ethnic groups addressed? • Does the theory of change explicitly account for the different circumstances of particular racial/ethnic groups? 	
Targeting	<ul style="list-style-type: none"> • Do eligibility requirements disproportionately exclude racial/ethnic groups? • Does the policy target funding and enrollment by characteristics correlated with racial/ethnic groups (e.g., income, wealth, poverty, health)? • Does the policy target access in terms of affordability that disproportionately affect racial/ethnic groups? 	
Data	<ul style="list-style-type: none"> • Are historical outcome and participation data available by race/ethnicity? • Have racial/ethnic policy assessments already been conducted? 	

Example sources: Original legislation, reauthorizing legislation, regulations, peer-reviewed published accounts of legislative history

diversitydatakids.org

Source: [diversitydatakids Policy Equity Assessments](https://diversitydatakids.org/Policy-Equity-Assessments)

Takeaways from Policy Equity Assessment Tool

Key Contributions: This tool is very comprehensive, and specifically designed for the exact purpose of conducting policy equity impact assessments of federal policies as noted and illustrated in the OMB comment. Practically speaking, the logic and capacity components of the tool will be the most useful for a racial equity impact assessment of CCDF policies, as the research evidence available to address many of the PEA questions is expected to be limited. Also, the PEA of federal Head Start programs and FMLA policies can serve as models for developing a similar assessment for federal CCDF policies.

Limitations: This tool has not been applied to CCDF policies. It provides a robust racial equity impact assessment method which requires research capacity and substantial investment of time/labor to do

completely (which may be beyond the desired scope, resources, or capacity of the agency). The PEA can, however, be adapted, abbreviated, and conducted without all components. This tool also does not include important elements of REIAs related to the overarching goal setting, planning and assessment process, e.g., embedding the best practice of diverse engagement in each step of the assessment.

(3) OPRE’s Racial and Ethnic Disparities in Human Services Project’s (RED/X) Identifying Racial and Ethnic Disparities in Human Services: A Conceptual Framework and Literature Review (McDaniel, 2017) <https://www.acf.hhs.gov/opre/report/identifying-racial-and-ethnic-disparities-human-services-conceptual-framework-and>

This resource provides a conceptual framework for identifying disparities by race and ethnicity throughout the service delivery pathway. The conceptual framework provides a definition of disparities for human services, identifies key places along the service delivery system where disparities may occur, and proposes methods for distinguishing between racial and ethnic differences and disparities.

This resource also includes a literature review that synthesizes existing disparities research on 6 different ACF programs³, including CCDF, that provides relevant information to inform the design of a RE policy equity impact assessments of federal CCDF policies.

Moreover, the [REDX project website](#) says that preliminary analysis for CCDF have been conducted and is using survey data, data generated by microsimulation, and CCDF program and administrative and policy data to address three research CCDF research topics:

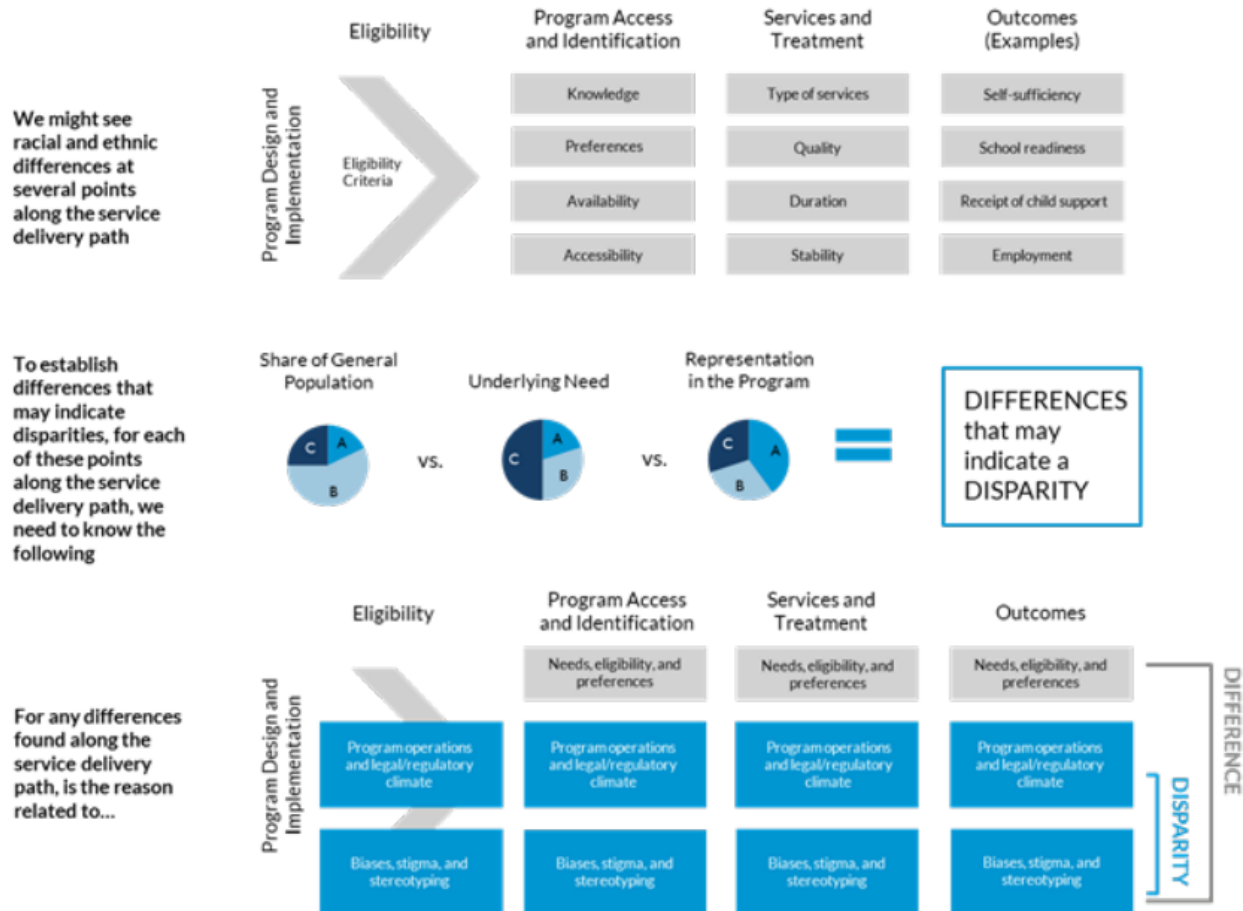
1. Racial and ethnic differences in the level of underlying financial need for child care subsidies,
2. Understanding differences by race and ethnicity in CCDF participation rates among program-eligible families, and
3. Potential differences in participation rates, by race and ethnicity, across different parts of the country.

³ Temporary Assistance for Needy Families (TANF), the Child Support Enforcement Program, the Child Care and Development Fund (CCDF), Head Start, and programs for runaway and homeless youth and adolescent pregnancy prevention programs administered by ACF’s Family and Youth Services Bureau (FYSB).

FIGURE ES.1

A Conceptual Framework for Identifying Racial and Ethnic Disparities in Human Services Delivery

Points along the service delivery path where we may see disparities and how we might recognize them



Source: [OPRE's Racial and Ethnic Disparities in Human Services Project's \(RED/X\) Identifying Racial and Ethnic Disparities in Human Services: A Conceptual Framework and Literature Review](#)

Takeaways from REDX in Human Services Delivery Conceptual Framework

Key contribution: The program access and services and treatment components of the conceptual framework are useful for guiding conceptual linkages between disparate policy access (e.g., program access, differential access/exposure to quality, differential subsidy and child care arrangement stability) to dimensions of CCDF service delivery, which can then be linked to specific dimensions of federal CCDF policies. It also summarizes past research and includes findings that provide helpful background and indicators related to disparate policy outcomes in CCDF, all of which provide foundational information for a RE policy impact assessment of CCDF policies.

Limitations: While this tool could inform the development of a conceptual framework for a racial equity policy impact assessment of federal CCDF policies, it does not serve as a comprehensive policy equity assessment methodology, nor does it present findings about specific dimensions of federal CCDF policies that should be the focus of a RE-PIA.

(4) OMB Report: Study to Identify Methods to Assess Equity: Report to the President, July 2021
https://www.whitehouse.gov/wp-content/uploads/2021/08/OMB-Report-on-E013985-Implementation_508-Compliant-Secure-v1.1.pdf

This OMB study was obligated by the Executive Order on Advancing Racial Equity and intended to provide findings that would offer guidance across a broad spectrum of topics relevant for developing a comprehensive government-wide equity agenda. It is therefore a very broad report that covers more than policy assessments and takes a lens of agency operations, systems and service delivery (which goes beyond policy impact analysis). The report includes:

1. a review of professional expertise relevant to assessments of equity and overview of promising assessment practices;
2. design of initial structures and approaches to guide and support agency equity assessments; and
3. an analysis of equity assessment activities undertaken by agencies at key milestones to support their final equity assessment products.

The findings from part 1 – review of professional experience and equity assessments - has some relevant descriptions of resources that may be of value to OCC/OPRE/ACF while planning for a racial equity policy impact assessment of CCDF policies. Some of the resources cited are already covered in this list of key resources, and other resources are similar to key resources listed here (e.g., other equity impact assessment tools like [Race Forward](#)). Some others may be worth further review, e.g., [MITRE's Framework for Assessing Equity in Federal Programs and Policy](#). See Figure 1 below, but note that these go beyond policy impact assessment, and consider the fuller lens of agency operations, service delivery and continuous improvement and monitoring cycles as well.

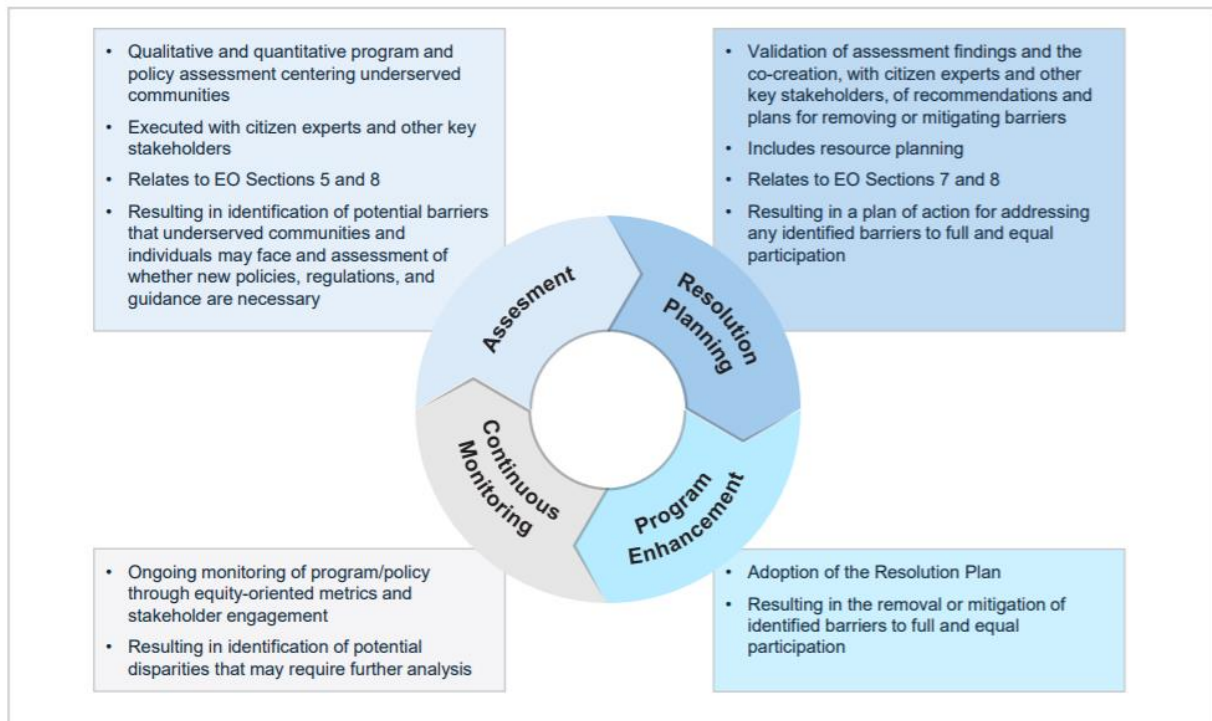


FIGURE 1: ADVANCING EQUITY IN FEDERAL POLICY AND PROGRAMS IS A CONTINUOUS EFFORT

Note: This document offers a framework for execution of the “Assessment” step of the lifecycle depicted above.

Source: [MITRE's Framework for Assessing Equity in Federal Programs and Policy](#)

Another key finding (see Finding #1) is that assessment frameworks, data and measurement tools and methods is a “nascent and evolving science and practice” and indicates that existing resources are varied. OMB recommends using tailored approaches for the particular equity assessment at hand.

One other potentially relevant resource mentioned in this report is a pilot set of tools for equity impact assessments in the OMB Circular A-19 legislative policy proposal development process developed by ASPE (with contractor support), based on an environmental scan. The report says, “Given the various types of programs, policies, and processes HHS has, as well as its various policy-making vehicles, HHS will use the scan to inform recommending equity assessments that are tailored to the purpose and can be used in both brief and ongoing processes.”

(5) Children’s Equity Project: Start with Equity – Early Childhood Equity Strategic Plan Template (Blevins, Meek, Iruka, 2021)

<https://childandfamilysuccess.asu.edu/sites/default/files/2021-06/CEP-equitySPtemplate-060221-fillable.pdf>

This resource is an assessment, planning, and monitoring tool to help states and tribes take strategic steps towards more equitable early care and education systems. The tool is organized around 14 key priorities for dismantling systemic racism in early care and education (developed in a [prior report](#) by this same group).

The assessment components of the tool (what they term “landscapes”) are the most relevant aspect of this tool for racial equity policy impact assessments. However, since this tool is geared directly towards states and tribes, it is not a tool that offers a comprehensive framework or set of methods for a RE policy impact assessment of federal CCDF policies.

That said, under each of the 14 priorities, there are a set of policy and data questions. It could be informative to consider, for each question, what federal CCDF policy lever may directly impact the constraints and requirements of states and tribes that shape their policies.

We list below the 14 priorities for reference:

1. Disseminate Public Funds Equitably
2. Move Toward Holistic, Strengths Based, and Authentic Integration
3. Embed Equity in Monitoring and Accountability Systems
4. Address Workforce Equity
5. Embed Equity in Workforce Preparation and Development
6. Explicitly Include Equity in the Definition of Quality and Across Rating Systems
7. Ensure High-Quality Curriculum and Pedagogy are Accessible and Culturally Responsive
8. Ensure Global Classroom Quality Measurement Explicitly Assesses Equitable Experiences
9. Eliminate Harsh Discipline
10. Address Equity In Early Intervention, Special Education, and Gifted and Talented Education Access, Identification, and Inclusion
11. Implement a Data-Driven Continuous Equitable Quality Improvement Cycle
12. Expand Family Leadership and Engagement Efforts
13. Center Family Child Care
14. Equitably Expand Access to Dual Language Immersion Approaches for Dual Language Learners

Section 4b: SUMMARIES -- Racial Equity Policy Reviews & Analyses

(6) Urban Institute's 2021 Assessing Child Care Subsidies through an Equity Lens: A Review of Policies and Practices in the Child Care and Development Fund

<https://www.urban.org/sites/default/files/publication/104777/assessing-child-care-subsidies-through-an-equity-lens.pdf>

This report presents the findings of an in-depth review of the child care subsidy system through an equity lens. The audience for the report includes state child care administrators, policymakers, and key stakeholders. It assesses what we know about whether CCDF policies are designed and implemented (or could be designed and implemented) to address the realities and challenges caused by structural racism that Black, Latino and immigrant families face.

The report makes 15 recommendations that point to federal and state policy design factors, and state and local implementation factors that could be contributing or used to better advance equity. The report therefore provides insights into dimensions of federal policy design that could be the subject of racial equity policy impact assessment. We list below the 5 relevant recommendations that most directly related to federal policy components:

- Conduct an equity analysis of subsidy policies and practices and system incentives that can shape which families get subsidies and how subsidies shape which providers they can access.
- Expand eligibility priorities to provide subsidies that support parents' ability to move ahead in the workforce by getting education and training or to find work.
- Simplify the process of getting and keeping subsidies to support continuity and stability as parents seek to support their children and move ahead in the workforce.
- Ensure the subsidy system supports parents' ability to use the full range of child care options they need to support their work realities and their children's development, including homebased providers and relatives who are legally exempt from licensing.
- Remove the link between market prices and subsidy payments, and instead focus payments on supporting quality improvements; recognize that providers may need operational supports separated from voucher or subsidy payments to remedy market failures in under-resourced communities.

Another set of relevant information from this report for informing racial equity policy impact assessments of CCDF policies, include the information included in the main findings Table 1 "Key Child Care Subsidy Policy Areas, Potential Equity Concerns, and Potential Strategies and Solutions". The table identifies policy/practice areas associated with the process of getting a subsidy (part 1) and whether subsidies allow parents to have equal access (part 2). Policy areas that most directly relate to federal policy components include:

Part 1: Process of getting a subsidy:

- Consumer knowledge/information about the subsidy program
- Eligibility criteria and priority to receive subsidies
- Application and eligibility documentation requirements

Part 2: Whether Subsidies Allow Parents to Have Equal Access:

- Provider eligibility (health and safety requirements create barriers to participation for license exempt, home-based providers; criminal background check requirements)
- Provider payment policies and practices
 - Cut the link between market prices and subsidy rates; target resources to providers in under-resourced communities
 - Payment practice, timeliness of payments, administrative burden on providers
 - Differential rates tied to quality measures (especially if defined by Quality Rating and Improvement Systems)
- Parent copayment policies and practices: Assess the cliff effect and consider ways to support parents such as establishing a longer graduated phase out, income disregards, and so forth; Set maximum copayments at 7 percent of family income (including provider fees) and exempt families below poverty; Assess interaction between rate caps and parent copays; raise rates to (or above) the 75th percentile to maximize equal access without resulting in parents having to pay more than copay.

The report also provides a helpful overview for considering how structural racism differential shapes the realities that parents of color are disproportionately facing that make accessing child care subsidies, proving eligibility, and providing documentation more difficult.

Takeaways from Urban Institute Review of CCDF Policies with an Equity Lens

Key Contributions: Based on review of existing evidence and interviews with 28 key informants, this report brings together what know about how CCDF policies may differentially impact families on the basis of race/ethnicity. It does not just examine dimensions of federal CCDF policies however, rather it examines family-side factors and how those family-side factors interact with CCDF service implementation and administration, components of state policy designs, and also federal policy designs. Therefore, the aspects of this report that are most relevant to a racial equity impact assessment are those that address aspects of federal policy design, and the value of the report for this purpose is that it identifies concrete aspects of federal CCDF policies that could be analyzed for equity impacts. It also outlines the key barriers Black, Hispanic and indigenous families face as a result of structural racism that are most relevant for CCDF policies.

Limitations: This report is geared primarily to state subsidy administrators to provide an overview of key issues at the state policy and implementation levels that they can influence and shape under the existing federal policy framework. As a result, its limitation is that it does not offer a tailored assessment framework/method for comprehensively analyzing the federal CCDF policy framework. Its contribution is more substantive to help identify dimensions of federal CCDF policies that may be ripe for equity impact analysis, but it is not a generalized framework or methodology that could be lifted and directly applied for the purpose of designing and implementing a racial equity policy impact assessment of federal CCDF policies.

(7) CLASP’s Equity Starts Early Addressing Racial Inequities in Child Care and Early Education Policy (Johnson-Staub, 2017)

https://www.clasp.org/sites/default/files/publications/2017/12/2017_EquityStartsEarly_0.pdf

This report is a review and analysis of the history, policy and practice of child care and early education programs, including: CCDBG, Head Start, and State Pre-K. It provides historical context for the evolution of the publicly supported early care and education (ECE) field as it relates to contemporary issues of racial equity; it describes patterns of differential access to ECE by race/ethnicity and nativity, and outlines barriers that differentially impact families on the basis of race, ethnicity and other markers of identity including: 1) affordability, 2) access to ECE programs, especially high-quality ECE, 3) eligibility criteria and administrative rules and processes, 4) supply challenges in under-resourced communities (e.g. child care deserts), 5) racial biases in quality definitions and QRIS systems, 6) access to dual-language settings, 7) disproportionalities in discipline, and a detailed outline of systemic inequities facing the early childhood workforce.

Based on this analysis, the report then identifies key recommendations for federal and state policymakers, several of which are specific to CCDF. To inform a racial equity policy impact assessment of CCDF policies, the federal, CCDF-related recommendations would need to be mapped onto specific dimensions of federal CCDF policies, and then could be prioritized for analysis in the RE policy impact assessment.

(8) diversitydatakids.org’s Advancing Racial Equity Through Neighborhood-informed early childhood policies: A Research and Policy Review (Hardy et al., 2021)

<https://www.diversitydatakids.org/research-library/research-report/advancing-racial-equity-through-neighborhood-informed-early>

This report focuses on what we know from research about how a pervasive source of structural inequality—neighborhood segregation--creates differential barriers to healthy early childhood development by race, with disproportionate negative impacts on young Black, Hispanic and indigenous children in the U.S. and how that matters for ECE policies. It then reports the results of a policy review that examines how specific federal early childhood policies (including CCDF) currently account for children’s neighborhood factors and the equity implications of this. It then analyzes how neighborhood-

informed approaches *could* be used more to advance equity both within existing policies/regulations, or if policies were modified.

Five existing CCDF levers are discussed in detail:

1. Contracts
2. Tiered/differential reimbursement
3. Targeted supply-building strategies
4. Equal access assurance
5. Priority groups; subsidy prioritization and allocation

These levers could be the subject of analysis for a comprehensive RE policy impact assessment of CCDF policies. There are also recommendations related to federal CCDF approaches to eligibility, accountability and monitoring that are also relevant.

Appendix A. Related Resources

Studies

ECE Equity-focused Research/Policy Briefs focused on specific groups

Bipartisan Policy Center:

- [Data and Funding Gaps in Tribal Early Care and Education](#)

Selected briefs by National Research Center on Hispanic Children & Families:

- [How State-level Child Care Development Fund Policies May Shape Access and Utilization Among Hispanic Families](#)
- [Hispanic Children’s Participation in Early Care and Education: Type of Care by Household Nativity Status, Race/Ethnicity, and Child Age](#)

Equity-focused study of impacts of CCDF administrative practices on subsidy stability:

- [Can Administrative Changes Improve Child-Care Subsidy Stability?](#)

Data Resources

Diversitydatakids.org: Early childhood equity indicators; Child Opportunity Index; affordability indicators;

- [Child Opportunity Index](#)
- [Early childhood equity indicators](#)

CDC

- [Social Vulnerability Index](#)

Urban Institute

- [TRIM3](#)

Center for American Progress

- [Child Care Deserts](#)

Child Care Aware Data Center

- [Child Care Data Center & State Fact Sheets](#)

Additional Racial Equity Impact Assessments

Government Alliance on Race and Equity:

- [Racial Equity Toolkit](#)

Race Forward

- [Racial Equity Impact Assessment](#)
- [Toolkits](#)

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