

A review of the CCDF Narrow Cost Analyses

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Introduction

The federal Child Care and Development Fund (CCDF) is the primary source of public funding to support access to child care for low-income working families. Combined, state and federal governments spend nearly \$9 billion annually on CCDF activities.ⁱ CCDF Lead Agencies have flexibility in how they spend CCDF funding, including how child care programs are reimbursed for care they provide to eligible children and families.¹ However, they must set their reimbursement rates at a level that is “sufficient to ensure equal access for eligible children... comparable to child care services provided to children whose parents are not eligible for CCDF.”ⁱⁱ To demonstrate this, Lead Agencies must either conduct a market rate survey or an alternative methodology every three years as part of their CCDF state plan submission. Whichever approach is taken, Lead Agencies must also conduct a “narrow cost analysis.”

While most CCDF plans were submitted in summer 2021, because of the COVID-19 pandemic Lead Agencies were able to request a one-year waiver on completion of their rate setting methodology and narrow cost analysis. As such, most Lead Agencies have now completed their narrow cost analysis. This paper presents the results of a scan of publicly available narrow cost analyses completed by states for this CCDF plan cycle. The paper reviews the requirements for conducting this analysis, the different approaches Lead Agencies could take, and provides examples from several states.

CCDF Requirements for a Narrow Cost Analysis

Historically, CCDF subsidy rates have been informed by a market rate survey, in which Lead Agencies collect price data from a sample of child care providers, and then set rates at a percentage of those prices. Recognizing the inequities in the child care market, and the failure of the market to support an adequate supply of child care, the 2014 reauthorization of the Child Care Development Block Grant, which funds CCDF, allowed Lead Agencies to use an alternative methodology to set rates, informed by a

¹ Note: under CCDF regulations, states and territories must designate a Lead Agency to manage the CCDF program. In this paper, the authors will refer to Lead Agencies to align with the language used in the CCDF program. These Lead Agencies are usually a state early childhood department, or an office within a state department of education or department health and human services. For a full list of state and territory Lead agencies, see: <https://www.acf.hhs.gov/occ/contact-information/state-and-territory-child-care-and-development-fund-administrators>

cost study or cost estimation model.ⁱⁱⁱ While only a handful have moved to setting rates informed by cost alone, all Lead Agencies are required to analyze the estimated cost of care, with the results of this narrow cost analysis included as part of the CCDF state plan.

The federal Administration for Children and Families (ACF), which oversees CCDF, requires a narrow cost analysis to estimate the cost of care in two areas:

1. The cost to implement health safety, quality, and staffing requirements that meet state licensing standards, and
2. The cost of higher-quality care, defined by the Lead Agency using either a quality rating and improvement system (QRIS) or another measure of quality.

Within these two areas, Lead Agencies must include variations based on geography, provider type, and child age. The narrow cost analysis is intended to inform the rate setting process, as an additional data point to help Lead Agencies ensure that subsidy payment rates meet the equal access provision. However, ACF allows flexibility in how much weight is put on the results of this analysis when setting subsidy payment rates.

Understanding child care prices and the cost of care

Child care prices reflect what providers can charge in their local market, based on what families can afford to pay. Because families are price-conscious, navigating constrained budgets, child care providers are limited in how they set their tuition, forced to keep tuition at a level that meets what families can afford and allows them to stay fully enrolled. When subsidy rates are based on price alone, they mirror the inadequacies of tuition in the private market, which is insufficient to cover the cost of care or adequately compensate the early childhood workforce. Collecting data on the actual costs child care programs incur can illustrate the true cost of child care, regardless of how much families can afford to pay. A cost-based approach can also integrate increased compensation for the early care and education (ECE) workforce and additional supports to ensure programs have the resources to meet the needs of children and families.

ACF provides some guidance to Lead Agencies on different options for completing a narrow cost analysis.^{iv} Prenatal to Five Fiscal Strategies completed a review of publicly available narrow cost analysis reports to identify the primary approaches Lead Agencies used in the most recent CCDF state plan cycle. The following section reviews these approaches, before providing examples from a scan of state reports.

Approaches to Conducting a Narrow Cost Analysis

Lead Agencies have flexibility on the approach they take to complete a narrow cost analysis, providing it meets the federal CCDF requirements as detailed earlier in this paper. Based on a review of publicly available narrow cost analysis reports as of September 2022, Prenatal to Five Fiscal Strategies identified four main approaches that have been used, which vary in their level of rigor and complexity:

- Develop a child care cost estimation model
- Use the Provider Cost of Quality Calculator
- Use a child care cost calculator
- Complete a cost study analysis

Develop a child care cost estimation model

The most rigorous and complete approach to estimating the cost of child care that meets both licensing standards and higher quality standards is to develop a cost estimation model.^v Several states developed a customized spreadsheet-based tool that allows them to estimate the cost of care for a program meeting licensing standards and higher standards, either aligned with a QRIS or some other measure of quality such as a national accreditation. The tool can include all program type settings, including license-exempt home-based care.

Building a state-specific tool allows for maximum flexibility, including all cost drivers that are specific to state standards, and accounting for any unique context that exists in a particular state. By developing a cost model, these states can also estimate the cost under various scenarios, illustrating the variation in cost based on program type, size, ages of children served, and geography. Cost estimation models can also demonstrate how costs change based on different quality variables, including requirements under a QRIS as well as the cost with increased salary and benefits for the early childhood workforce.

A state-specific cost estimation model is often populated with provider data that has been collected for the purpose of informing the inputs in the cost model. This data can be collected as part of the market rate survey or through a separate survey for the narrow cost analysis. In other cases, states can populate the model with secondary data, including data from a workforce or professional development registry, grant applications, or other economic data related to salaries, benefits and non-personnel expenses.

Use the Provider Cost of Quality Calculator

The federal Office of Child Care commissioned the [Provider Cost of Quality](#) (PCQC) as a web-based tool to support states in understanding the cost of child care in center and family child care home settings. The PCQC offers much of the same functionality of a spreadsheet-based cost model, allowing states to estimate the cost of care at the program and child level, for a child care center or family child care home meeting minimum licensing standards and up to five additional quality levels. The PCQC can be used with the included default state data, or users can enter their own state-specific data for most categories including salaries, benefits, and non-personnel costs. Users can include additional staffing at higher quality levels as well as other specific costs such as conducting child assessments.

The level of customization offered by the PCQC might be sufficient for states needs related to their narrow cost analysis. The PCQC does not allow users to change the underlying methodology or formulas that drive the calculations in the model.

Use a child care cost calculator

The third approach used by several Lead Agencies for their narrow cost analysis is the use of a cost calculator, either one of the publicly available cost calculators or a locally developed calculator. The Center for American Progress (CAP) has developed two such calculators that provide state-level estimates of the cost of care and allow for limited customization. The calculators produce results for child care centers and family child care homes, with the home-based model incorporating a salary for the provider/owner to better reflect the true cost of care in this setting. States can review the methodology and default data for each calculator to determine if these tools will produce reliable estimates that reflect the cost of care in their state. The results can be compared to current subsidy rates to provide insight into the sufficiency of rates and where gaps between market prices and costs are greatest. These additional steps with

comparing the outputs of a cost calculator to available revenue support states in meeting their narrow cost analysis requirement.

The costofchildcare.org calculator is a web-based tool that shows the cost of meeting licensing standards in each state for infants, toddlers, and preschoolers.^{vi} The calculator allows users to select up to 8 different pre-set characteristics to estimate the cost of higher-quality, beyond licensing standards, including higher salaries, health insurance and retirement benefits, lower group sizes, additional classroom resources, and paid planning time for teachers. This calculator provides state-, age-, and provider type-specific estimates with no need for inputting or collecting additional data. However, users are very limited in their ability to customize their estimate with no overrides of the default data included in the tool.

The second online calculator was developed by CAP to inform estimates of the increased cost of providing safe care during the COVID-19 pandemic.^{vii} The COVID-19 cost calculator is based on a similar methodology to the costofchildcare.org tool but allows for additional customization. Users can modify the size of the program, ratios and group sizes, the number of staff, and salaries and benefits. Users cannot modify non-personnel costs, other than those costs related to sanitation. The calculator does provide estimates for child care centers and family child care homes.

Complete a cost study analysis

The fourth and final approach addressed in this report is the use of a cost study. A cost study analyzes data related to child care provider costs and uses this data to produce an estimate of the cost to operate a program, with different results based on program characteristics. A cost study can be designed to meet the unique context of a state or territory, and can vary in scope, analyzing the current cost of care and potentially also analyzing the cost of higher-quality care, or care with increased costs, such as higher compensation. Cost studies often utilize data collected as part of the market rate survey, if Lead Agencies added questions to that survey related to specific cost drivers, such as data on salary and benefits and occupancy costs. Lead Agencies can also commission a survey or conduct provider interviews specifically for a cost study.

If sufficient data is collected to inform the study, cost studies can provide a detailed understanding of the cost of care, customized based on state licensing and quality standards. If data collection is limited, caution must be used in the interpretation of results, including for specific types of child care programs if they were not adequately represented in data collection. Cost studies only provide a point-in-time estimate of the cost of care, based on the period of data collection. Cost studies can be used in conjunction with a cost model, using data collected for a cost study to inform the cost model. However, as a stand-alone study they do not allow for the flexibility and future customization that comes with the development of a cost estimation model. Cost studies may meet the requirements of the narrow cost analysis, with the addition of comparison of the cost study detailed to available revenues.

Narrow Cost Analysis in Action

Based on a scan of publicly available state narrow cost analysis reports, the table below identifies examples where Lead Agencies utilized each of the four approaches described in the prior section.² As

²² Note: Some Lead Agencies received a one-year waiver when submitting their FY22-24 CCDF state plan which allowed them to delay completion of their narrow cost analysis. While some who received waivers have published their narrow cost analysis, as of September 2022 not all have made them publicly available and therefore are not included in this analysis.

shown, most states either developed a cost model or conducted a cost study. Several Lead Agencies used the PCQC and a handful used one of the available cost calculators. Following this table, four case studies are presented, demonstrating how several states have used these approaches.

Table 1. Examples of state approaches for their FY22-24 CCDF State Plan Narrow Cost Analysis

Cost Model	PCQC	Cost Calculator	Cost Study
Arkansas	Alabama	Idaho	Alaska
Colorado	Connecticut	Montana	Delaware
District of Columbia	Maine		Iowa
Georgia	Maryland		Louisiana
Illinois	Michigan		Missouri
Indiana	New York		North Dakota
Kansas	Wisconsin		Ohio
New Mexico			Pennsylvania
Oklahoma			Rhode Island
Oregon			Tennessee
Virginia			Utah

Cost Estimation Model: Kansas

The Kansas Department of Children and Families used American Rescue Plan funding to support development of a customized cost estimation model. The model follows the same core methodology as the PCQC and uses data collected through the market rate survey, from the U.S. Bureau of Labor Statistics, and additional default data from the PCQC. As Kansas is in the pilot phase of developing its QRIS, Links to Quality, the cost model estimates the cost of higher quality through both the draft requirements for Links to Quality and using the requirements for Early Head Start implementation under Early Head Start-Child Care partnerships. This cost model provides answers to the immediate questions required in the narrow cost analysis but is also a tool that the state can use for future planning purposes, both to understand the gaps between cost and any new subsidy rates, and to estimate the cost of meeting requirements under the states QRIS.

Provider Cost of Quality Calculator: Maryland

The Maryland State Department of Education used the PCQC to complete their narrow cost analysis.^{viii} This approach used salary data collected as part of the market rate survey in combination with default data from the Bureau of Labor Statistics and average non-personnel cost data embedded in the PCQC. To account for regional variations, researchers created separate scenarios in the PCQC for each of the seven subsidy regions that Maryland uses for rate setting. To account for the cost of meeting the higher quality standards in the state quality rating system, the PCQC defaults were modified to reflect increased compensation for the workforce, and additional substitute coverage time to allow for child assessments and increased planning time. A default program size was used for consistency across scenarios in the PCQC, and researchers translated the program-level cost outputs from the PCQC into a cost per child to compare costs to subsidy rates.³ This approach was used for both center-based and family child care home settings across all regions of the state subsidy system.

³ Maryland used the legacy PCQC, which did not include a cost per child output. The updated PCQC, released in December 2022, includes a cost per child output.

Cost calculator: Idaho

To fulfil its requirements under CCDF, the Idaho Department of Health and Welfare used the Center for American Progress Costofchildcare.org calculator in conjunction with provider wage data collected through the state’s workforce registry database.^{ix} Idaho’s approach focused on the primary cost driver, namely personnel costs, noting that the CAP calculator found that about 52% of provider costs were associated with staff wages. Using wage data from the workforce registry the state was then able to estimate the cost of care for child care centers and group- or family-based child care centers and compare this to the average reimbursement rate for the respective program type.

Cost study: Tennessee

The Tennessee Department of Human Services commissioned a cost of quality care study to determine the cost drivers for quality child care programs, aligned with the states QRIS.^x The study was informed by a provider survey that collected financial and other operating information from a sample of providers across the state. Researchers gathered expenditure data across nine categories, including salaries and benefits, food, education supplies, and transportation. This data was analyzed by provider setting, quality level, and geographic location. The study demonstrated that providers operating at the higher levels on the QRIS had larger expenditures than those lower on the QRIS, driven primarily by higher salaries. Due to inconsistency across the financial data collected, the conclusions of the cost study are limited, but overall the study does provide insight into the costs incurred by providers, regardless of their tuition prices.

Beyond the narrow cost analysis

Understanding the cost to provide child care that meets licensing regulations and higher quality standards is an important step in addressing the broken child care market. While several Lead Agencies have increased their reimbursement rates in recent years to a higher percentage of the market rate, because these rates are still based on market prices, they fail to address the underlying structural flaws in that market. With the data from their narrow cost analysis, states can design policies and strategies to address the flaws in the market and better meet the needs of children and families in the subsidy system, and beyond. CCDF does not require Lead Agencies to use their narrow cost analysis to set rates, giving flexibility to decide how much weight to put on the results. As such, some Lead Agencies have used this analysis to inform rates, others have used it to inform other funding mechanisms, and still more have used the data for education and advocacy in their state or community.

Using the narrow cost analysis to inform subsidy rate setting

Some Lead Agencies have used a rigorous process, such as a customized cost estimation model, to understand the cost of care and inform rate setting. This approach can address many of the inequities of the market-based approach, ensuring that rates reflect costs regardless of families’ ability to pay. This approach can be especially beneficial for states seeking to increase the supply of infant and toddler child care, family child care settings, and care in rural communities, where the gap between what families can afford and the cost of care is often greatest. In the most recent CCDF plan cycle, the District of Columbia, New Mexico, and Virginia all sought and received approval to use an alternative methodology to study the cost of care. These states used their findings to set rates. In New Mexico, this change resulted in a 22% increase in subsidy rates for infants in a child care center, and a 54-70% increase in the rate for children under 6 in family child care homes.^{xi}

For Lead Agencies who completed a market rate survey and did not seek approval for alternative methodology, the results of their narrow cost analysis can be used as an additional data point to inform rate setting, combined with data from the market rate survey. In Louisiana, the state completed a market rate survey in 2020 but also conducted a cost analysis in 2021 using data from the grant applications providers submitted to access American Rescue Plan funding.^{xii} This analysis found that the cost of caring for an infant was almost three times as much as the cost to care for older children, even though the difference in subsidy rates is only a few dollars. This data was ultimately used by the state to significantly increase subsidy payment rates, with infant rates increasing 91% in child care centers and 106% in family child care homes.^{xiii}

Determining adequate funding to incentivize care

States can use the cost analysis to show where gaps between price and cost are greatest and consider setting subsidy rates at a higher percentile of the market rate for those populations. This is often the case for programs serving infants and toddlers, providers in rural communities, and providers at higher levels of a state quality rating and improvement system (QRIS).

The Virginia Department of Education commissioned a cost estimation model in 2022 to estimate the true cost of child care across the Commonwealth as an alternative to the market rate survey. While the department has stated its intention to set subsidy rates that reflect the cost of care, they have also acknowledged the disproportionate impact the current child care market has on the supply of infant and toddler child care.^{xiv} As such, Virginia child care regulations have been amended to state that “Child Care Subsidy vendor payment rates for infants and toddler shall fully reflect the cost of care”, recognizing that this population is most negatively impacted by the market-based approach to rate setting.^{xv} While Virginia is ramping up rate increases to achieve rates based on full cost of care, the most recent change to subsidy rates, informed by this cost model, saw increases for infant rates in all counties, while a small number of counties saw preschool and school-age-rates unchanged.^{xvi}

Lead Agencies can also use this data to better align quality incentives such as tiered subsidy payment rates, which offer rate increases for programs that achieve higher levels on their state quality rating and improvement system (QRIS). These increases are often a percentage or dollar amount that is not based on the actual cost difference to meet higher standards. A cost analysis that incorporates an estimate of the cost of higher quality can support states to set their incentives at levels that will support providers to operate at higher quality. In Arkansas, as of 2021 the state found that 58% of providers were operating at a level one or below on the state QRIS. The state conducted a cost analysis to identify the resources needed to move up one level and used this data to inform subgrant award amounts that were made available to providers using American Rescue Plan funding.^{xvii}

Increasing understanding of the true cost of care

The results of a cost analysis can provide transparency into the economics of child care. Because child care prices take up such a large part of many families’ budgets, the reality that child care workers barely make above minimum wage is often met with surprise by parents and policymakers. The results from a cost analysis can illustrate the resources required to operate a quality program and the impact of regulations and quality standards, such as ratios and group sizes, on the cost of care. They can also demonstrate the disproportionate impact on specific populations such as infants and toddlers, highlighting why policies should target this underserved population.^{xviii}

For example, cost models and cost calculators show that personnel costs account for between 60 and 80% of the total expenses of a program.^{xi} Therefore increasing child care worker compensation to a livable wage puts the cost of child care beyond what subsidy currently pays or what families can afford.^x This is especially true for infant and toddler care, where developmentally appropriate care requires low teacher-child ratios, but the revenue available to cover the salaries of the teachers in that classroom is limited, frequently marginally better than the revenue available for serving older children.

Data from cost analysis can be integrated into education efforts to increase support for public funding of the child care system. Cost data can demonstrate both the need for increased subsidy rates and also the need to expand subsidy eligibility to better reflect the incomes at which families need help paying for child care. This can lay the groundwork for future policy change and build momentum for the investments needed to fund these policies.

In Delaware, the state completed a cost study to meet the requirements for a narrow cost analysis, using data collected from their market rate survey. Following this, the legislature passed a bill requiring the state to develop a cost of quality cost estimation tool to better understand the true cost of care.^{xi} The resulting calculator and report identified the gaps between the cost of care and the current subsidy rates, finding that the state would need to invest 12-86 percent more per child just to meet minimum licensing requirements.^{xii} Data from the cost calculator helped make the case for additional investments in child care, showing why more funding was needed beyond the federal COVID-19 relief funding.

Conclusion

This review of narrow cost analysis approaches has demonstrated the multiple ways that states can seek to answer the question of how much it costs to provide quality child care. These approaches exist on a continuum, and it is important for states to determine the goals of their cost analysis and align their approach with the intended uses of the results. For Lead Agencies that are ready to set subsidy payment rates based on cost rather than market price, developing a customized cost estimation model provides the greatest flexibility to capture the variations in cost across provider types and geography. At the other end of the continuum, for states just starting their journey of using cost data to inform policy, pulling results from an existing cost calculator can provide a preliminary understanding of any gaps between current funding streams and the true cost of care, and can act as a useful education tool to help explain the deficiencies of the current market-based approach.

Whichever approach Lead Agencies pursued in their most recent narrow cost analysis, it is important this activity is not a one-time event. For those who developed a cost model or conducted a cost study, this should be updated regularly to capture changing costs faced by providers, and the assumptions underlying these models or studies should be reviewed by key constituents to ensure they continue to be accurate. In addition, beyond the requirements of the CCDF state plan, Lead Agencies should use this data to inform policymaking and increase understanding of the economics of child care, ultimately ensuring a more equitable approach to funding access to high-quality child care.

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