

Pluralism in Action:

Policy Steps to Improve Child Care Options

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Introduction

Child care can be extremely costly for many families in America. For those who utilized paid child care, the costs vary, but can at times be eye-popping: For a family looking for full-time infant care in a child care center in a large urban area, the median annual price is over \$15,000. Of course, that varies greatly by a child's age, the type of care, and the regional cost of living. Full-time care for preschooler in a rural area in a home-based care setting has a median cost of around \$6,550.¹

But focusing only on out-of-pocket costs of paid care ignores the broad spectrum of child care arrangements in the U.S. The 2023 Early Childhood Program Participation Survey finds that just over half (55 percent) of children age 5 and under had at least one non-parental care arrangement, and of those, one-third relied on relatives like grandparents, aunt or uncles, or other extended family. Another one-sixth relied on non-relative caregivers, like nannies, babysitters, or au pairs.² The survey finds predictable gradients by race and class: upper-income families are roughly twice as likely to be using regular child care compared to those in the lowest income bracket.

Of course, many families who would prefer to be utilizing formal child care find the cost too expensive. But it also the case—and this intuition is backed up by numerous public opinion surveys—that many parents have an affirmative preference for care that is familiar, culturally-sensitive, flexible, and close-by.³ Informal child care providers, like friends, relatives, and neighbors provide an important part of the child care landscape that policy proposals that focus on subsidizing the cost of formal child care often ignore. One-size-fits-

all policy prescriptions ignore the heterogeneous preferences of parents across different parts of the country, different work-life situations, different price points, and even when their child is at different ages.

Recognizing the immense diversity of household preferences and circumstances around the care of young children should steer policymakers to consider a child care approach to recognizes the full spectrum of early childhood care situations. This point of view was exemplified by Vice-President J.D. Vance's response during his debate with Minnesota Gov. Tim Walz during the 2024 campaign:

"Let's say you'd like your church, maybe, to help you out with child care. Maybe you live in a rural area or an urban area, and you'd like to get together with families in your neighborhood to provide child care in the way that makes the most sense...We want to promote choice in how we deliver family care and how we promote child care...We're going to have to induce more people to want to provide child care options for American families because the reason it's so expensive right now is because you've got way too few people providing this very essential service."⁴

That requires an all-of-the-above approach to child care policy, rather than top-heavy mandates, or policies that favor industry actors to the exclusion of less formal care arrangements. In 2021, I laid out three principles for a "pluralistic" approach to child care, encouraging policymakers to:

- Dedicate funding to a wide array of providers through grants, loans, and technical assistance, seeking to empower local communities and meet parents’ stated desires;
- Avoid quality-improvement mandates that don’t necessarily improve long-term outcomes and push costs up, and;
- Improve the functioning of the child care market for child care by increasing supply and experimenting with innovative funding models.⁵

There are any number of bold reforms that policymakers could attempt to align our early childhood policy along these lines. But there are also more modest steps than an administration or Congress that wants to be authentically pro-family could attempt without seeking wholesale reform. This report looks to outline a few specific changes to current policy that could improve the child care landscape for all families, regardless of how they utilize formal or informal child care.

Children who do not participate in any regular child care

By family income

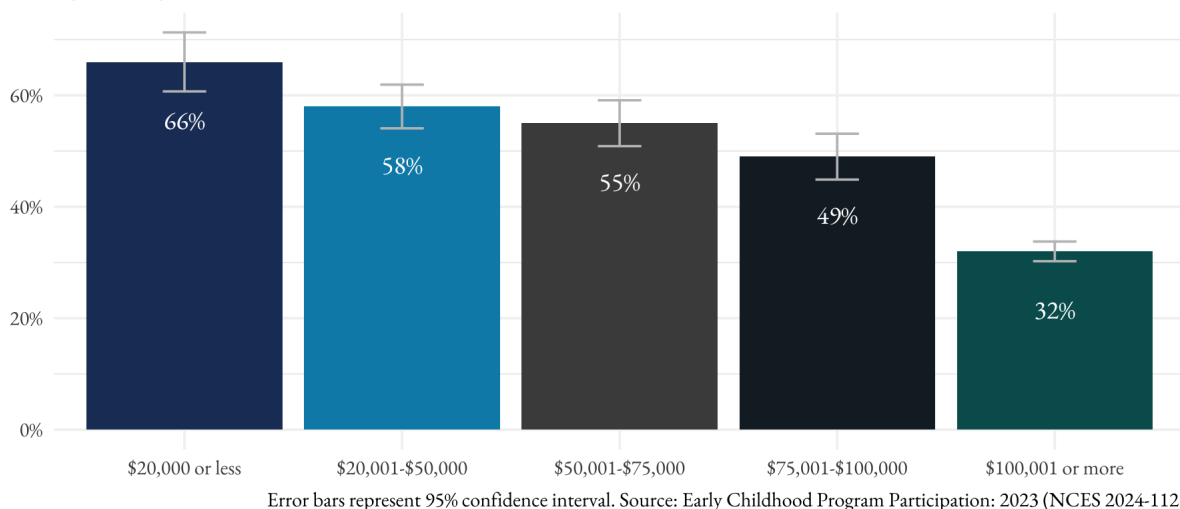


Figure 1

What Is, and Isn’t, “Child Care”?

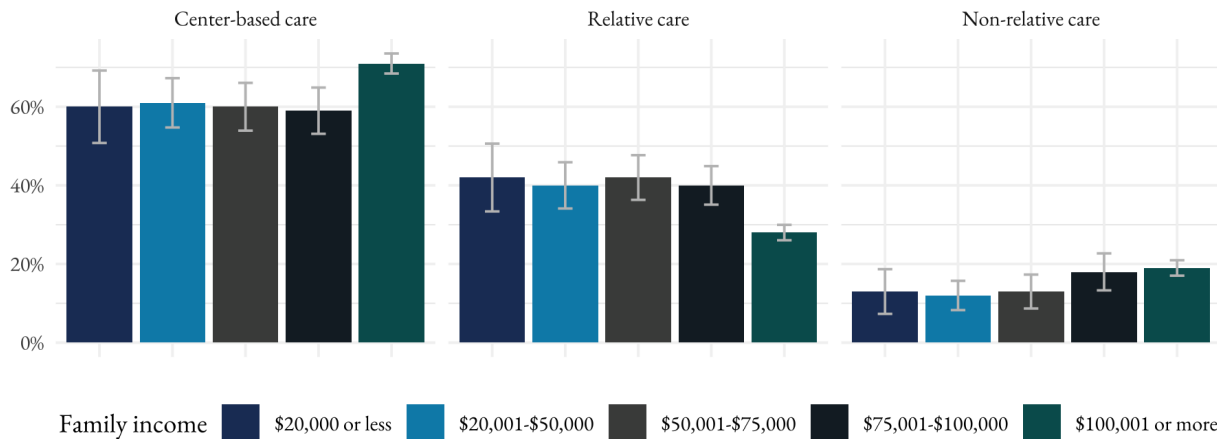
There are roughly 22.5 million children aged 0-5 in the United States,⁶ and it is only slight exaggeration to say that there are 22.5 million different ways of constructing care for young children. To clarify our discussions, we might shorthand the situations that involve non-parental care as broadly falling as “formal” and “informal” arrangements. Within “formal” is a broad range of options—part-time and full-time centers, co-ops, nannies, preschool programs, “Mommy’s Day Out” programs, anything that falls under the licensing and

regulatory regime of a given state. “Informal” care is often provided by relatives, but could also be neighbors or other trusted caregivers who don’t fall under the usual licensing structure.

The intent of providing child care, at whatever level of formality, is to give working parents the ability to participate in the labor force. Who does this leave out? The group of people who spend the most time providing care to young children: their parents (roughly 40 percent of young children have no regular non-parental care arrangement.)⁷

Participation in type of child care

Among children with at least one weekly non-parental child care arrangement



Note: Totals within each income category will sum to greater than 100%, as some children have more than one type of care. Error bars represent 95% confidence interval. Source: Early Childhood Program Participation: 2023 (NCES 2024-112)

Figure 2

Why don't we include stay-at-home parents in discussions about child care policy? Why shouldn't policymakers make stay-at-home parents eligible for child care assistance? There are at least two answers we could give; one mundane, the other more conceptual. In general, the concept of "child care" is commonly understood to mean care that is provided in order that parents can work: whether in single-parent households or in two-parent households where both parents are working.

In a comprehensive universal child care system, an "at home care allowance" would be necessary to treat both households where all parents are working at parity with those who choose to have a parent at home. But in our current system, while federal child care dollars are allocated as a discretionary line item rather than an individual entitlement, allowing families with a parent at home to access federal dollars intended to help working parents with the cost of child care would weaken the Congressional intent of the program and possibly making it harder for otherwise-eligible working parents to obtain assistance in accessing assistance with obtaining child care.

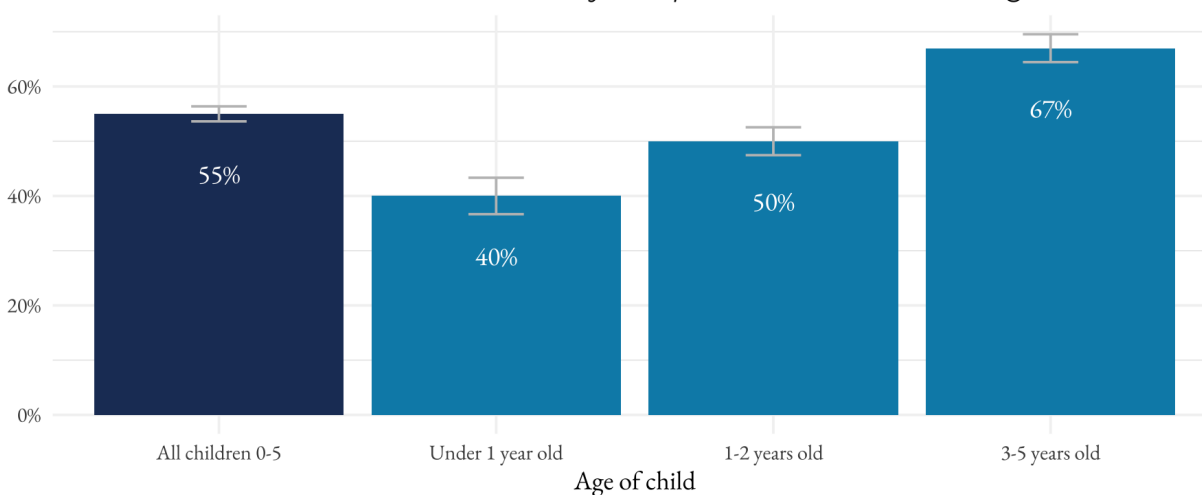
There is a broader reason to distinguish the work of at-home parents from formal or informal child care as well. These parents provide meaningful, even es-

sential, labor within their homes; yet the institution of the family is fundamentally pre-political. The invaluable work of raising a family predates the institution of the state and should not be subsumed into it. Reconceptualizing the work being done by stay-at-home parents as "child care" not only distorts the express purpose of child care efforts, undertaken for the intention of helping working parents manage their responsibilities in the labor force and at home. It also suggests that families with parents at home watching young kids are acting as "child care providers" in a way that should be rendered legible by governmental action, rather than something more fundamental that exists outside the remit of federal policies.

When the government seeks to make child care more affordable, it should seek to do so without putting a thumb on the scale for individual families' decision between work and home life. Policies to make child more affordable should, both conceptually and in practice, be kept distinct from broader efforts to support families across the board. Such worthy efforts could include policies like expanding the Child Tax Credit, more generous subsidies for family health insurance, expanding housing supply to help lower prices, or other approaches that benefit families broadly and go beyond the scope of this paper.

Participation in any type of child care, by age

Share of children with at least one weekly non-parental child care arrangement



Error bars represent 95% confidence interval. Source: Early Childhood Program Participation: 2023 (NCES 2024-112)

Figure 3

The Child Care Development Fund

The **Child Care Development Fund (CCDF)** is our nation's primary way of ensuring low-income workers have access to reliable child care, boosting their connection to work and increasing their household's economic stability. While there are many problems of family formation and affordability that the CCDF does not address, it has traditionally received bipartisan support for its ability to ensure low-income households are better able to work—a policy goal that has been proven to improve outcomes for children.

As the out-of-pocket cost of child care continues to rise, low-income families that receive benefits through the CCDF are able to rely on low-cost child care to maintain a connection to the labor force. On the whole, CCDF prioritizes parental choice, state flexibility and is not an entitlement program.⁸ In 2022, roughly 870,000 households received child care support via the CCDF⁹.

While there is much to appreciate about the CCDF, there are ways the Trump administration could improve the way the program operates. Across multiple Presidential administrations, federal rulemaking around the child care Development Block Grant has constrained states' degrees of freedom in implementing the CCDF. In par-

ticular, the 2016 Final Rule promulgated by the Obama administration, and the 2024 Final Rule promulgated by the Biden administration, both reduced flexibility in how the CCDF could be administered, handcuffing state approaches and second-guessing parents' assessments of what kind of child care is best for them. This memo outlines brief suggestions on how to best reverse that trend and allow CCDF to function more effectively.

Mission Creep

For decades, the traditional purpose of the CCDF was focused on "allow[ing] each State maximum flexibility in developing child care programs and policies that best suit the needs of children and parents within that State...[and] promot[ing] parental choice to empower working parents to make their own decisions regarding the child care services that best suits their family's needs."¹⁰ Congress expanded the goals of the program in 2014, and the two Final Rules mentioned above both continued that push away from prioritizing state flexibility and parental choice.

Among other changes, the **2016 Final Rule**:¹¹

- Encouraged, though did not require, states to lower the acceptable copayment for families who utilize CCDF from ten to seven percent of household family income, narrowing the ability of states to use CCDF dollars to serve as wide a population as possible;
- Required states to “provide for a progression of professional development that may include postsecondary education,” highlighting the tendency towards over-credentialization that goes beyond ensuring access to care;
- Required states to pay only for part- or full-time child care, barring the use of more flexible arrangements, like per-hour.

Additionally, among other changes, the **2024 Final Rule**:¹²

- Required states to cap family co-payments above 7 percent of a family’s income, tying the hands of states in being able to serve more families;
- Required states to provide some child care services through contracts, rather than allowing them to use vouchers which give parents the option of finding the provider that best meets their needs or values.

Revisiting these rules, and identifying other opportunities to enhance authentic parental choice and improve the ability of states to creatively implement CCDF, should be a priority.

Prioritizing Parental Choice

The CCDF has always had strong protections for parents that wish to seek out a pluralistic approach to child care, recognizing that families’ needs and preferences differ (some may place a strong emphasis on a day care that reflects their cultural heritage, or religious background, or is located near their home or place of work.)

Whether parents receiving CCDF certificates are aware of the flexibility the program is designed to

provide, however, isn’t always clear. Among parents who received assistance to pay for care, 18 percent relied on relatives to provide care, below the overall average (34 percent of parents with at least one weekly nonparental care arrangement.) Among parents who pay for child care out of their own pocket, 21 percent attend a child care located at a church, synagogue, or other place of worship.¹³ Among those who receive assistance (such as through a state welfare program), only 8 percent of families attend a child care located at a faith-based location.

Nationally, three-quarters of families who receive CCDF use them at child care centers (including for-profit, faith-based and school-based programs), with the other quarter using their certificate for a child care provider at home or at a home-based child care provider.¹⁴ That average conceals some heterogeneity across states; more than half of states reporting 80 percent of children or more served at child care centers. Four states—California, Massachusetts, Nevada, and New York—serve 15 percent or more of their children by contracting with providers, rather than giving parents certificates to take to the provider of their choice.

Another form of diversity is who gets served by CCDF. 8 in 10 families who receive CCDF receive it for work; another 11 percent are in education (or training and work) and one in ten children who receive CCDF dollars are in protective services (a statutorily-allowable use of funds by states.) Reflecting the low-income and frequently disadvantaged makeup of the eligible population, 40 percent of CCDF beneficiaries are below the federal poverty line. 80 percent of current CCDF beneficiaries are in single-parent-headed households; Black, non-Hispanic children are over-represented in CCDF (they represent 36 percent of children served, while they make up 14 percent of the total under-13 population)

Partly because of long state waitlists, and partly because of parental preferences, children under two make up a small portion of CCDF beneficiaries; 15 percent nationwide, ranging from a low of 11 percent in Colorado and Maryland to a high of 24 percent of beneficiaries in Louisiana. Many parents who receive CCDF can use the funds to pay for af-

terschool programming to allow them to cover more of the conventional work day. One-third of CCDF recipients nationwide are between the ages of 6 and 13, ranging from 8 percent in Tennessee to 46 percent in California.

Each of these parents will face a different choice set, and bring different preferences to the table, when evaluating care options for their child or children. The best thing the CCDF program can do is to empower them to make the choice that fits their families' needs and values best, and eliminate some of the bureaucratic red tape that has made it harder for providers and families to navigate the program.

Enhanced Points of Emphasis

Some efforts to increase parental choice and flexibility in the CCDF could include efforts to simply emphasize underutilized parts of the existing program. The statutory text requires states to “collect and disseminate to parents of eligible children, the general public and, where applicable, child care providers, consumer education information that will promote informed child care choices...”¹⁵ The statute also specifically calls for states to provide parents “concerning the full range of child care options (including faith-based and community-based child care providers).”¹⁶

Some states already do proactively inform CCDF recipients that their certificates can be used for relative-provided care, but not all states report utilizing print and electronic media forms of consumer education strategies.¹⁷ Not all states have the administrative capacity to engage in successful outreach, so a federal campaign—either aimed at consumers, informing them of their rights, or giving templates to states to adapt and disseminate as they see fit, could expand awareness of the flexibility inherent to the CCDF program.

A similar federal campaign could be useful in ensuring that regulations do not get in the way of providers' participation in the program. While daycares and child care providers are ultimately guided by state regulation that federal lawmakers have little ability to influence directly, CCDF's emphasis on parental

choice provides the groundwork for a campaign of encouragement for state governing bodies to review their licensing for outdated, unnecessary, conflicting, or duplicative guidance.

As a condition of participating in CCDF, “Lead Agencies may not set health and safety standards and requirements other than those required [elsewhere in] this section that are inconsistent with the parental choice safeguards.”¹⁸ A muscular enforcement of that provision could help states understand the benefits of cleaner, more streamlined regulations in making it easier for new firms to enter the market as well as providing predictability for parents and providers.

Areas for Potential Changes

What follows are suggestions for areas that executive branch rule makers and/or Congressional authorizing language could target for improvement—in many cases removing additions from prior Presidential administration, or tweaking existing rules to better advance the goal of parental choice:

CURRENT TEXT: “Lead Agencies shall increase parent choice by providing some portion of the delivery of direct services via grants or contracts, including at a minimum for children in underserved geographic areas, infants and toddlers, and children with disabilities.”¹⁹

SUGGESTION: Lead agencies should entrust parents with the ability to choose their child care provider, and not seek to limit states' flexibility in how they implement that goal. This provision should be curtailed or eliminated.

CURRENT TEXT: “Parental choice provisions shall not be construed as prohibiting a Lead Agency from providing parents with information and incentives that encourage the selection of high-quality child care.”²⁰

SUGGESTION: Specifically providing for “information and incentives” to encourage what regulators deem as “high-quality child care” is a nod to tying payments to the Quality Rating and Improvement System (QRIS). While some interest groups applaud QRIS for leading providers to invest in more training and other inputs that raise the cost of care, the evidence base linking QRIS to better outcomes for children is relatively weak.²¹ This section suggests “parental choice” should at times be subordinated to the goal of more “high-quality child care” and thus should be curtailed or eliminated.

CURRENT TEXT: “The Lead Agency must describe in the Plan the State or Territory framework for training, professional development, and postsecondary education for caregivers, teachers, and directors...[that address] professional standards and competencies, career pathways...to promote the social, emotional, physical, and cognitive development of children...reflects current research and best practices...Improves the quality, diversity, stability, and retention (including financial incentives and compensation improvements) of caregivers.”²²

SUGGESTION: The beneficiaries of the CCDF program are the parents and children who it serves, not the workers or establishments that provide these services. While the federal government has a vested interest in wanting reliable and competent child care workers providing care, allowing CCDF to be used as a stick or carrot dictating how states should guide workforce development along certain goals deemed socially desirable misunderstands the purpose of the program. This section should be rewritten and refocused on simple and clear baseline professional standards, without concerns about “career pathways,” “diversity,” or “professional development.”

CURRENT TEXT: *Requires lead agencies to “Pay providers on a part-time or full-time basis (rather than paying for hours of service or smaller increments of time)”*²³

SUGGESTION: This needlessly restricts states’ flexibility to experiment with CCDF approaches that allow parents to seek hourly or irregular care arrangements. This section should be curtailed or eliminated.

CURRENT TEXT: “Supporting the training, professional development, and postsecondary education of the child care workforce as part of a progression of professional development...Relate to the use of scientifically based, developmentally-appropriate, culturally-appropriate, and age-appropriate strategies to promote the social, emotional, physical, and cognitive development of children...training and outreach on engaging parents and families in culturally and linguistically appropriate ways... Providing training or professional development for caregivers, teachers and directors regarding the early neurological development of children...”²⁴

SUGGESTION: This section lists out ways that Lead Agencies could be considered investing in improving the quality of child care. While the 2014 reauthorization establishes a new focus on increasing care quality, this section suggests the degree to which “quality improvement” can easily get decoupled from the goal of giving parents more choices. If states want to include some of these principles in their understanding of quality, they should be free to, but they should not be hamstrung by granular approaches specified in federal legislation. This section should be revisited with an eye towards stripping out extraneous areas of focus, and ultimately ensuring that “quality” does not become code for “professionalization” of care.

CURRENT TEXT: “No less than nine percent [of aggregate CCDF funds spend by a state or territory] shall be used for activities designed to improve the quality of child care services and increase parental options for, and access to, high-quality child care...No less than three percent shall be used to carry out activities as such activities relate to the quality of care for infants and toddlers.”²⁵

SUGGESTION: This twelve percent threshold for quality-improvement spending was set by statute in the 2014 reauthorization and therefore may be difficult to be changed by the executive branch. But it deserves to be revisited: it restricts states’ financial flexibility, forcing them to spend on “quality improvement” measures that drive up the cost of care but are not necessarily related to child’s outcomes, and it is an effective tax on the CCDF money that states receive, shrinking the potential number of families that could receive assistance.

CURRENT TEXT: “To be eligible for services under § 98.50, a child shall, at the time of eligibility determination or redetermination...Reside with a family whose income does not exceed 85 percent of the State’s median income (SMI)...[and] Reside with a parent or parents who are working or attending a job training or educational program.”²⁶

SUGGESTION: The current test to participate in CCDF requires a child to have a parent or both parents working or attending job training or education. As we have seen, the vast majority percent of children currently receiving CCDF benefits are a household with a single parent, some of whom have a cohabiting partner that has no legal responsibility for the child (ranging from a low of 51 percent in Arkansas to a high of 93 percent of participants in Alabama, Illinois, Indiana.) For married parents on CCDF, there is a degree of variety between states: 20 states require *each* parent to work a set minimum number of hours (usually 15 or 20, but as high as 32 hours each in Iowa); a handful give

families flexibility in meeting the total hours-worked requirement *as a couple* (Florida, Kentucky, Utah), while the majority have no minimum work hours so long as both parents stay employed or in training.²⁷

In-kind benefits, such as housing and health care coverage, are known to penalize marriage by encouraging cohabiting or unmarried households to maintain an income under the eligibility threshold. While marriage penalties in other safety-net programs are more likely to penalize marriage than child care benefits, there is no reason why states or the federal government should deliberately use policy design to reward unmarried parenthood over married parents. For example, take a Georgia couple, considering marriage, cohabiting with a child; if partner A’s income was \$28,000 and partner B’s income was \$22,000, their combined income of \$50,000 would surpass the state’s CCDF eligibility threshold (\$39,996 for a family of three), despite the fact that either of their incomes alone would make them eligible currently. The state could, if it so chose, apply for a federal waiver that would allow it to disregard even half of partner B’s income, in which case the couple would no longer be facing an explicit marriage penalty.

In cases where CCDF benefits are being claimed by one parent, but their combined household income upon marriage would put them over the 85 percent of SMI threshold, policymakers could experiment with:

- Setting aside all or a portion of the lower-earning spouses’ income in determining the households’ eligibility for CCDF.²⁸
- Specifying that households already receiving CCDF benefits will not lose those benefits for a period of three years if their household income changes due to marriage

The benefit of the former approach is that it would prospectively lay out an even playing field for couples considering marriage, though it would expand the pool of potentially eligible households. The benefit of the latter approach is that it would explicitly tie the benefit to marriage, but could run the risk of creating the perverse incentive of rewarding couples who have a child before getting married, knowing that they would have a chance to locking in more generous child care benefits than those who wait to tie the knot before having a child.

CURRENT TEXT: “child care providers that receive assistance through grants or contracts under the CCDF shall not discriminate, on the basis of religion, in the employment of caregivers as defined in § 98.2...Notwithstanding paragraph (a) of this section, a sectarian organization may require that employees adhere to the religious tenets and teachings of such organization and to rules forbidding the use of drugs or alcohol.”

SUGGESTION: More research and outreach should be done to ascertain how wide a problem this is, but anecdotally, religious child care providers who want to hire coreligionists to work at their preschool or child care facility run the risk of running afoul of this provision. Granting faith-based providers a more explicit safe harbor in giving hiring preferences to fellow congregants—beyond just holding potential employees to the “religious tenets and teachings”—may allow them to operate more freely.²⁹

CURRENT TEXT: “affordable family co-payments that are not a barrier to families receiving assistance under this part, not to exceed 7 percent of income for all families, regardless of the number of children in care who may be receiving CCDF assistance.”³⁰

SUGGESTION: The allowable threshold for copays has been repeatedly ratcheted downwards over the years. In 1998, the Clinton administration recommended a non-binding cap on co-pays for CCDF recipients of ten percent of household income. In 2016, the Obama administration recommended—but again, did not require—that states set a goal of seven percent of household income as a cap on co-pays. Finally, in 2024, the Biden administration sought to enact a nationally binding cap on CCDF copays, mandating that states charge no more than seven percent of household income (21 states asked for a waiver from this provision.)³¹ This was based on a misreading of the historical average for what share of income gets paid on child care: seven percent, the overall average, is much lower than the long-run average paid for infant care (10.5 percent of household income) or by full-time workers (7.9 percent).³² Additionally, this handcuffs states by making assistance more generous for the smaller number of families who are able to obtain assistance, but reduce the funds available for states who would prefer to experiment with different approaches to serve a wider number of families. If states want to be more generous, they can—in 24 states, a family of three earning \$30,000 would expect to pay no copays for CCDF child care.³³ But it is inappropriate to have the stranglehold on state flexibility slowly tightened from the federal level without input from Congress or the states; this statement should be rewritten to restore the older, ten percent recommended guidance.

CCDBG Reauthorization

The **Child Care Development Block Grant (CCDBG)** is the legislative vehicle that provides funding for the CCDF and other child care initiatives. It was last reauthorized in 2014; a recently-introduced piece of legislation, the child care Modernization Act of 2025, would seek to reauthorize CCDBG in a bipartisan manner.³⁴ As written, some of the bill’s major provisions include:

- **Increasing funding rates for child care providers:** The bill would use a “cost estimation model,” rather than the current survey-based method of determining the market rate for child care, allowing state reimbursement rates to child care providers to account for the “full cost of care.” This would conceivably account

for the cost of staff salaries, benefits, recruitment and training, as well as other operating expenses, in determining the amount that is paid out to providers.

- **Establishing capacity expansion grants for states:** The bill would provide grants aimed at inducing child care supply, including technical assistance for providers, with funds able to be used for startup costs, community- or neighborhood-based family care networks, nontraditional care, and other areas of interest.
- **Expanding potential eligibility for child care assistance:** The bill would allow states the ability to serve families above the current income eligibility limit (85 percent of state median income) so long as all eligible children below the current threshold are being served

The bill offers a number of provisions which broadly accord with principles of pluralism and expanding options for options by expanding supply rather than spending on demand-side subsidies. Giving states more flexibility to serve families above the threshold could lead to increased burdens, but could also give states the authority to experiment with methods of reducing or eliminating marriage penalties in CCDBG programs. The bill specifically names the desire for a “mixed delivery” system, which properly understood encompasses all sorts and manner of formal and informal care, though without any meaningful enforcement of what that holistic understanding should entail in practice.

Notably, the bill does direct states to “undertake a review of State and local health and safety requirements...[including food preparation requirements] to determine redundancies and oversights that may exist, to ensure (I) children receive child care services in healthy and safe environments; and (II) child care providers can easily identify, understand, and comply with applicable health and safety requirements.” It is the right impulse, and should be amplified in discussion of the bill, rather than tucked away in favor of other provisions that tend to be favored by industry voices.

On the negative side, inflating reimbursement costs for providers to account for the “full cost of care” could end up driving disparities within the system, as larger providers with more fixed costs, infrastructure, and overhead could end up benefitting more than smaller, home-based providers. Home-based providers have been leaving the CCDBG program over recent decades; the number of licensed small home-based care providers fell by almost half from 2005 to 2017.³⁵ A policy design that implicitly favor larger providers over small ones could make that dynamic worse.

There are other sins of omission—the bill extends the nine percent quality improvement threshold that reduces state flexibility, does not explicitly address marriage penalties, and has no explicit discussion of the role that relatives, neighbors, and other informal caregivers can play. As the bill continues down its legislative, Congress and the administration should seek opportunities to inject concepts of authentic pluralism into its working, and use the upcoming re-authorization as opportunity to give states freedom to broaden choices for working parents.

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- 3 See, for example, Smith, Linda, Victoria Owens, and Samantha Peyton, "Untangling Family, Friend, and Neighbor Care," Bipartisan Policy Center (2022), <https://bipartisanpolicy.org/blog/informal-child-care/> and American Compass, 2021 Home Building Survey (Feb. 2022), <https://americancompass.org/wp-content/uploads/2022/10/American-Compass-2021-Home-Building-Survey-Final.pdf>
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- 8 15 percent of the approximately 12 million children that would be eligible under federal rules receive benefits through the CCDF program: <https://www.gao.gov/products/gao-25-107754>
- 9 All numbers from preliminary 2022 data: <https://acf.gov/occ/data/fy-2022-ccdf-data-tables-preliminary>.
- 10 45 CFR 98.1 (a)(1-2). The CCDBG Act of 2014 added a goal of "assist[ing] States in improving the overall quality of child care services and program" and "increas[ing] the number and percentage of low-income children in high-quality child care settings," broadening the scope of the law beyond its initial ambit. See 42 USC Chapter 105, Subchapter II-B: child care and Development Block Grant, §9857, Short title and purposes, <https://uscode.house.gov/view.xhtml?path=/prelim@title42/chapter105/B&edition=prelim>
- 11 <https://www.federalregister.gov/documents/2016/09/30/2016-22986/child-care-and-development-fund-ccdf-program#page-67579>
- 12 <https://www.federalregister.gov/documents/2024/03/01/2024-04139/improving-child-care-access-affordability-and-stability-in-the-child-care-and-development-fund-ccdf>
- 13 "Early Childhood Program Participation: 2023"
- 14 ACF preliminary 2022 data
- 15 45 CFR 98.15(b)(4)
- 16 45 CFR 98.52(b)(1)
- 17 Preliminary 2022 data, Table 8

- 18 45 CFR 98.41(b)
- 19 45 CFR 98.30(b)(1)
- 20 45 CFR 98.30(h)
- 21 “Child Care Pluralism,” p. 15-17.
- 22 45 CFR 98.44(a)
- 23 45 CFR 98.45(m)(3)
- 24 45 CFR 98.53(a)(1)
- 25 45 CFR 98.50(b)(1-2)
- 26 45 CFR 98.20(a)(3)
- 27 <https://acf.gov/sites/default/files/documents/opre/opre-CCDF-policies-database-2023-may25.pdf>
- 28 There is already statutory precedence for adjusting income eligibility in given circumstances; some states count only a portion of a step-parent or temporarily absent parents’ income when calculating CCDF eligibility (see Table 8) <https://acf.gov/sites/default/files/documents/opre/opre-CCDF-policies-database-2023-may25.pdf>
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