



**CCDBG Discussion Draft
ACSI and AACCS Joint Response to Request for Comments
April 8, 2026**

To Whom It May Concern:

The Association of Christian Schools International (ACSI) and the American Association of Christian Schools (AACCS) offer the following comments in response to the call to participate in the Discussion Draft on legislation related to Child Care Program Integrity. Thank you in advance for your consideration.

ACSI is the largest Protestant school association with roughly 2,250 member schools in the U.S., another 3,400 worldwide, and 160 international schools. We serve an additional 25,000 Christian schools across the globe through our services and resources. The AACCS is the oldest Protestant school association with 730 schools and 38 state and regional affiliates in the U.S. that serve 118,000 students. Our mission is to strengthen Christian schools and equip Christian educators worldwide as they prepare students academically and inspire them to become devoted followers of Jesus.

Discussion Draft feedback:

1. The Draft is wise to eliminate the marriage penalty. If anything, an opposite policy is worth considering whereby married couples are better able to participate.
2. The costs of electronic verification requirements should not fall on non-profit providers: states should provide this as an equitable service where they provide electronic devices to non-profits without reducing their funding.
3. Biometric processes should be specifically forbidden in the statute. The Draft's specific reference to "finger imaging device" and "interactive voice response device" is a bridge too far and should be removed.
 - a. Biometrics are appropriately controversial in and of themselves and states cannot be trusted with maintaining the confidentiality of that information.
 - b. Even the federal government's own Office of Management and Budget (OMB) data on its employees was successfully hacked in 2014-2015 affecting nearly 22 million people and culminating in a \$63 million settlement. Data included the fingerprints of employees or those who submitted to a background check. It is not beyond imagination that *state* safeguards will be lower than federal in several cases.

- c. In a [June 13, 2024, article](#), *CSOonline* reported on “11 major information security incidents” involving federal agencies in a report to OMB. Clearly, the challenge is ongoing.
 - d. There is no reason to collect biometric data when a simple validated PIN or QR code from a family will suffice. *This needs to be in statute*; the vagaries of regulation from one Administration to the next already complicate the effectiveness of the program itself. In addition, the requirement that the Secretary issue regulations on electronic authentication tools opens the door for needless bureaucracy and burdens that will potentially change every four years.
4. To this point (item #3(d)), even electronic verification of attendance adds another burden to honest providers who must juggle ongoing regulation. This comes in the face of states who could do more rigorous spot-checking, but do not. No provider wants multiple spot-checks, but the accounts of Minnesota day care centers with zero children, zero cars in the parking lot and locked doors suggest that the state would have had at least the *opportunity* to notice those irregularities had it done even minimal spot-checking. But here the legislation would compel honest providers in states with more rigorous enforcement to add electronic verification. It’s worth considering methods to push the states with incentives, including penalties for failure to act, to engage in or reinforce verification processes and requirements already ostensibly in place!
5. For example, a Department of Health and Human Services (HHS) Office of the Inspector General (OIG) [report on May 21, 2025](#) of an 18-month investigation of Minnesota’s early education (beginning in October 2023) recommended “that the Minnesota Department of Human Services strengthen its monitoring program to include routine reviews of CCAP attendance records for accuracy.” This sounds like Minnesota was not even doing “routine reviews” of attendance. True, the OIG also recommended real-time electronic reporting of attendance, but, again, this measure is merely to overcome the state’s apparent failure to do bare-minimum “routine reviews” of verification. *Please note: the state will still need to do “routine reviews” of its electronic data.* It’s not about the data when federal oversight literally produces a recommendation for the state to do “routine reviews”.
6. The legislation should consider eliminating direct grants altogether. Committing fraud via parental certificates is far more difficult. Receipt of a direct grant should thus trigger increased enforcement action from more frequent spot checks to rigorous and frequent review of financial transactions and attendance.
7. We note with respect that attendance comprises a small part of improper payments. The [Program Integrity Fact Sheet](#) based on the 2023 Error Rate Review indicates that 39% of

errors are due to “missing or insufficient documentation” (MID) while “61% of improper payment errors were due to causes other than MID.” Of that 61%, “incorrect hours of care” accounted for 16%. Fully 43% of the 61% falls under “income miscalculation.” Thus, the Draft’s effort to strengthen verification of eligibility is a reasonable and worthwhile step. The states need to get this right.

8. Regarding the addition of subsection (c), Database on Providers Under Administration for Children and Families, what statute or section provides the criteria for disqualification? For instance, could a child care center be considered disqualified for the religious nature of the program? Violations are not clarified. A clear standard of what constitutes a disqualification must be established to prevent abuse.
9. The Draft’s requirement of adding “fraud” as an improper payment in error reporting is a wise move. So, too, is the more frequent reporting on a two-year basis (rather than three), and the requirement publicly to post the results.
10. The Inspector General Report related to states that fail audits (which the Draft requires) should be required annually rather than every two years.
11. The various requirements for public posting of reports and data are always a good idea, and the Draft wisely includes several.

Respectfully submitted,



P. George Tryfiates
Vice President for Public Policy & Legal Affairs
Association of Christian Schools International



Jamison Coppola
Government Relations Director
American Association of Christian Schools