

Queensland Government Submission

Productivity Commission Inquiry into Early Childhood Education and Care Sector

September 2023

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Introduction

The Queensland Government welcomes the opportunity to contribute to the Productivity Commission (the Commission) Inquiry into the Early Childhood Education and Care (ECEC) sector in Australia.

ECEC fundamentally supports parental workforce participation, and has flow-on benefits to the economy more broadly. Evidence clearly demonstrates quality ECEC, including kindergarten in the year before school, is pivotal in lifting developmental outcomes at key life stages where intervention can have the most impact in supporting healthy lifelong development and wellbeing, particularly for vulnerable cohorts.¹

There is already a significant reform agenda in ECEC at the national level. Similarly, a number of jurisdictions, including Queensland, are pursuing major reforms over the next five years to ensure children in their state are set up for the best start in life.

Building on the state's success in lifting kindergarten participation from 29% in 2008 to 99.7% in 2022, Queensland reforms are being progressed in a unique context. As Australia's second largest and most decentralised mainland state, Queensland faces specific challenges in ensuring high-quality ECEC provision across its dispersed population, with a significant proportion of children in regional, rural and remote areas and a high proportion of First Nations children, in both urban and rural environments.

This submission seeks to provide principles that could be used by the Commission to guide reform recommendations, and includes information on: benefits of ECEC; the national policy and funding context; Queensland's ECEC system; Queensland Government initiatives; and further reform opportunities.

Benefits of ECEC

Research over many years has clearly demonstrated that ECEC has strong economic and social benefits, particularly with respect to the role it plays in facilitating workforce participation (particularly for women)² and supporting early learning and development (particularly for vulnerable cohorts).¹

Workforce participation

Many Australian women shoulder the responsibility of unpaid domestic work and care obligations. The [2023-24 Queensland Women's Budget Statement](#) recognises that consistent with global trends, Australian women spend more time undertaking unpaid work and caring for children than men³ which impacts women's participation in the workforce.⁴

In June 2023, the participation gap between women and men in Queensland was 7.6 percentage points, compared to 8.7 percentage points at the national level.⁵ Women are also more likely to work part-time

¹ OECD. (2017). *Starting Strong 2017: Key OECD Indicators on Early Childhood Education and Care*. OECD Publishing. <https://doi.org/10.1787/9789264276116-en>.

² Grudnoff, M. (2022). *The Economic Benefits of High-Quality Universal Early Child Education*. The Australia Institute. https://australiainstitute.org.au/wp-content/uploads/2022/04/Economic_Aspects_of_ECEC_in_Australia_FINAL.pdf

³ ABS How Australians Use Their Time, as referenced in the 2023-24 Queensland Women's Economic Budget Statement accessed at https://budget.qld.gov.au/files/Budget_2023-24_Queensland_Womens_Budget_Statement.pdf.

⁴ ABS Barriers and Incentives to Labour Force Participation.

⁵ ABS Labour Force (June 2023), Labour force status by Sex, Queensland.

and be underemployed compared to men.⁶ These factors contribute to economic inequality for women over their lifetime and are a barrier to gender equality more broadly.

The [Queensland Women's Strategy 2022–27](#) builds on the significant progress to date in providing a high-level framework to remove barriers to gender equality in Queensland over the next 5 years. The new strategy sets out the Queensland Government's plan and commitment to support Queensland women and girls to succeed and contribute to Queensland society, with the primary and overarching focus being women's economic security.

A lack of economic security and financial independence amplifies every other barrier that prevents women from achieving equality. Lower wages in female-dominated industries, the gender pay gap, workplace segregation and gendered stereotypes all contribute to this imbalance.

As highlighted in the *2023-24 Queensland Women's Budget Statement*, access to affordable childcare is a known barrier to women's workforce participation. This was also reflected in stakeholder consultation on the development of the [Good people. Good jobs: Queensland Workforce Strategy 2022–2032](#) (Workforce Strategy), where stakeholders raised the importance of accessible and affordable childcare as a major contributor to workforce participation in Queensland. While availability of accessible and affordable ECEC is an enabler to workforce participation, conversely a lack of ECEC services can limit economic participation in the same locality.

The Workforce Strategy highlights the importance of maximising workforce participation in Queensland to build a strong and diverse workforce that supports economic and social prosperity. The Workforce Strategy includes a broad range of actions that the Queensland Government is taking to maximise workforce participation, in partnership with industries, employers, regions and communities. It also highlights that the Queensland Government is committed to working with all levels of government to address current and future workforce challenges, including through advocacy to the Australian Government for lifting barriers to workforce participation through childcare subsidies. Addressing barriers that prevent women from participating in the workforce will improve women's economic opportunities and outcomes, while also boosting workforce participation and productivity across the economy.

Early learning and development

Early learning, child development and wellbeing outcomes in the early years are universally recognised as critical foundations leading to positive health, social and economic outcomes for all children. They can have lifelong impacts on an individual's health, education and wellbeing, particularly for vulnerable cohorts.

In 2014, the Commission found 'there is strong evidence from the large volume of literature and research that intervention programs to improve the development outcomes of children from disadvantaged

⁶ As above. See also *2023-24 Queensland Women's Budget Statement*, accessed at https://budget.qld.gov.au/files/Budget_2023-24_Queensland_Womens_Budget_Statement.pdf.

backgrounds provide benefits for those children in the short term and potentially into adulthood as well as for the wider community'.⁷

Universal settings and supportive environments, such as ECEC, are key enablers to increasing engagement with essential services and supports to strengthen learning, development and wellbeing outcomes for children. These benefits are strongly correlated to service quality, so an ongoing emphasis on the quality of ECEC provision is vital.

Quality kindergarten is particularly critical in lifting developmental outcomes and supporting continuity of learning as children transition to school, with evidence indicating this benefit extends to kindergarten delivery in the two years prior to school.⁸

Key principles to guide future reform of the ECEC sector

The Queensland Government suggests the following key principles to guide the Commission's recommendations regarding future reform of the ECEC sector. Specifically, any reforms should:

- acknowledge the dual focus of ECEC in maximising workforce participation and supporting early childhood development;
- provide for flexibility in implementation, acknowledging the different demographic and geographic circumstances between and within jurisdictions;
- reflect a strong ongoing commitment to the National Quality Framework (NQF);
- respect existing infrastructure, investment and service delivery models across jurisdictions;
- pursue national consistency and national intervention only when these are necessary to achieve agreed objectives and align with agreed national frameworks, such as the Early Years Learning Framework (EYLF);
- as the market expands, continue to emphasise the critical importance of managing risk and ensuring safe, high-quality provision through a robust regulatory framework;
- respond to the needs of specific cohorts, including children experiencing vulnerability, First Nations children, children with disability, and children at risk of, or subject to, child protection intervention;
- avoid simplistic comparison of services, and unnecessary burden on the sector;
- acknowledge the need to work collaboratively with all levels of government, (including the Jobs and Skills Council), employers, workers, unions and training providers to address ECEC workforce shortages;

⁷ Productivity Commission (2014). [Review into Childcare and Early Childhood Learning Final Report](#).

⁸ Fox, S., Geddes, M. (2016). *Preschool – Two Years are Better Than One: Developing a universal preschool program for Australian 3 year olds – evidence, policy and implementation*. Mitchell Institute. <https://www.vu.edu.au/sites/default/files/two-years-are-better-than-one-mitchell-institute.pdf>.

- in line with [National Agreement on Closing the Gap](#) reform priorities, provide for culturally appropriate services and initiatives delivered to First Nations children and delivery of services by Aboriginal and Torres Strait Islander organisations (i.e. community-controlled entities);
- consider the accessibility of ECEC services for children with disability and acknowledge that a quality service for a student with disability may have different elements to a quality service to a student without disability;
- consider the role of wrap-around services to support children who are experiencing, or at risk of, disadvantage; and
- acknowledge the increasing cost of living for families and the impact this has on a family's ability to access and afford ECEC.

National policy and funding context

The Australian Government is primarily responsible for early childhood care policy and funding subsidies through the Child Care Subsidy (CCS), which varies based on a family's work and other circumstances. They also have policy and financial involvement in provision of kindergarten through the Preschool Reform Agreement (PRA).

States and territories are responsible for regulating all ECEC services, as well as determining kindergarten policy and funding settings.

Both levels of government play a role in supporting the ECEC workforce and setting the parameters for regulation of ECEC services under the [Education and Care Services National Law](#) (National Law) and [Education and Care Services National Regulations](#) (National Regulations).

All Australian governments are contributing to development of a [National vision for early childhood education and care](#), which is considering ECEC's role in supporting parents' workforce participation and children's education and development outcomes.

The [National Children's Education and Care Workforce Strategy](#) outlines a long-term, national approach to addressing workforce challenges in the ECEC sector. The Queensland Government is working with other jurisdictions and stakeholders to co-design implementation and evaluation plans for specific initiatives.

As party to the [National Agreement on Closing the Gap](#), Queensland has agreed in-principle to the [Sector Strengthening Plan: Early Childhood Care and Development](#), which seeks to build the Aboriginal and Torres Strait Islander community-controlled ECEC sector. Queensland is also a member of the [Early Childhood Care and Development Policy Partnership](#), which looks to identify and action reforms to support Aboriginal and Torres Strait Islander children to achieve their potential in the early years, and set them up for long-term success.

Long-term funding security for kindergarten delivery has been a consistent priority for the Queensland Government. On 21 December 2021, Queensland signed the PRA for 2022 to 2025, securing up to \$360 million in federal funding for kindergarten service delivery in Queensland over this four-year period.

The PRA seeks to facilitate children's early learning and development and transition to school by:

- maintaining universal access to affordable, quality preschool programs for all children;
- improving participation in preschool programs; and
- maximising the benefit of the preschool year by improving outcomes for children.

Funding under the PRA is subject to implementation of a substantive reform agenda. Although kindergarten participation is not compulsory, from 2024 payments under the PRA will be tied to implementation of a new national attendance measure, and a new preschool outcomes measure will be trialled in the life of the agreement.

Queensland context

In Queensland, the Department of Education (DoE) funds, regulates, supports and delivers a range of services and programs to ensure the early learning, health, safety and wellbeing of children from birth to 12 years. These services include long day care, family day care providers, kindergarten (including State Delivered Kindergarten and eKindy), and outside school hours care (OSHC), for school age children.

A range of other agencies (including Queensland Health; the Department of Youth Justice, Employment, Small Business and Training; the Department of Treaty, Aboriginal and Torres Strait Islander Partnerships, Communities and the Arts; and the Department of Child Safety, Seniors and Disability Services) deliver programs and initiatives that work alongside ECEC services to enable children to reach their full potential as individuals and make productive contributions to their families and communities. These agencies work alongside supports delivered through other support systems, such as the National Disability Insurance Scheme (NDIS) for children requiring specialist disability supports.

Regulatory environment

The Queensland Early Childhood Regulatory Authority (QECRA) regulates centre-based and family day care services approved under the NQF in line with the National Law and National Regulations. In addition, it also regulates another 51 Queensland education and care services approved to operate under Queensland's *Education and Care Service Act (Qld) 2013*. Of these 51 services, 23 are services in Indigenous communities in Queensland that receive Budget Based Funds from the Australian Government. The Queensland Government invested \$31.7 million in 2022–23 for regulation of ECEC services in Queensland.

The QECRA uses a [Regulating for Quality Framework](#) that adopts a risk-based approach to drive continuous improvement and ensure efforts are focused on areas that present the greatest risk to the health, safety and wellbeing of children. It publishes enforcement actions and provider details, identifies

annual priority areas for regulatory activity and provides guided support programs to drive improvement in persistently poor-quality ECEC services in vulnerable communities.

The inherent vulnerability of very young children means that service safety and quality is of critical importance, and regulatory authorities need adequate tools and resourcing to protect the health, safety and wellbeing of children attending ECEC. As the market has expanded over recent years, the level of notifications of incident and complaints received by regulatory authorities has risen steeply. In Queensland, there was a 37% increase in notifications of complaints, and a 53% increase in notifications of incidents (excluding service closures) in the two years between 2020 and 2022.

Rising rates of notifications of incident and complaints far exceed the rate of service growth and are indicative of potential non-compliance that requires a regulatory response.

Queensland will continue to work closely with the Australian Children's Education and Care Quality Authority (ACECQA) as part of the review of the child safety provisions under the National Quality Framework (NQF) and related systems such as Working with Children Checks – see the [Terms of Reference](#).

Queensland along with other jurisdictions will consider the report expected to be handed down in December. The report will consider how effective the NQF and related national and jurisdictional systems and structures (laws, regulations, standards and practices) are to safeguard children's safety while attending an approved ECEC service and will outline recommendations for improvements and opportunities for improved systems' alignment and/or integration.

ECEC services

The QECRA regulates approximately 3200 ECEC services, ensuring the health, safety and wellbeing of approximately 315,000 children in their care. Of these services, 55% are long day care services, 16% are kindergarten services (including State Delivered Kindergartens) and 25% are Outside School Hours Care services.

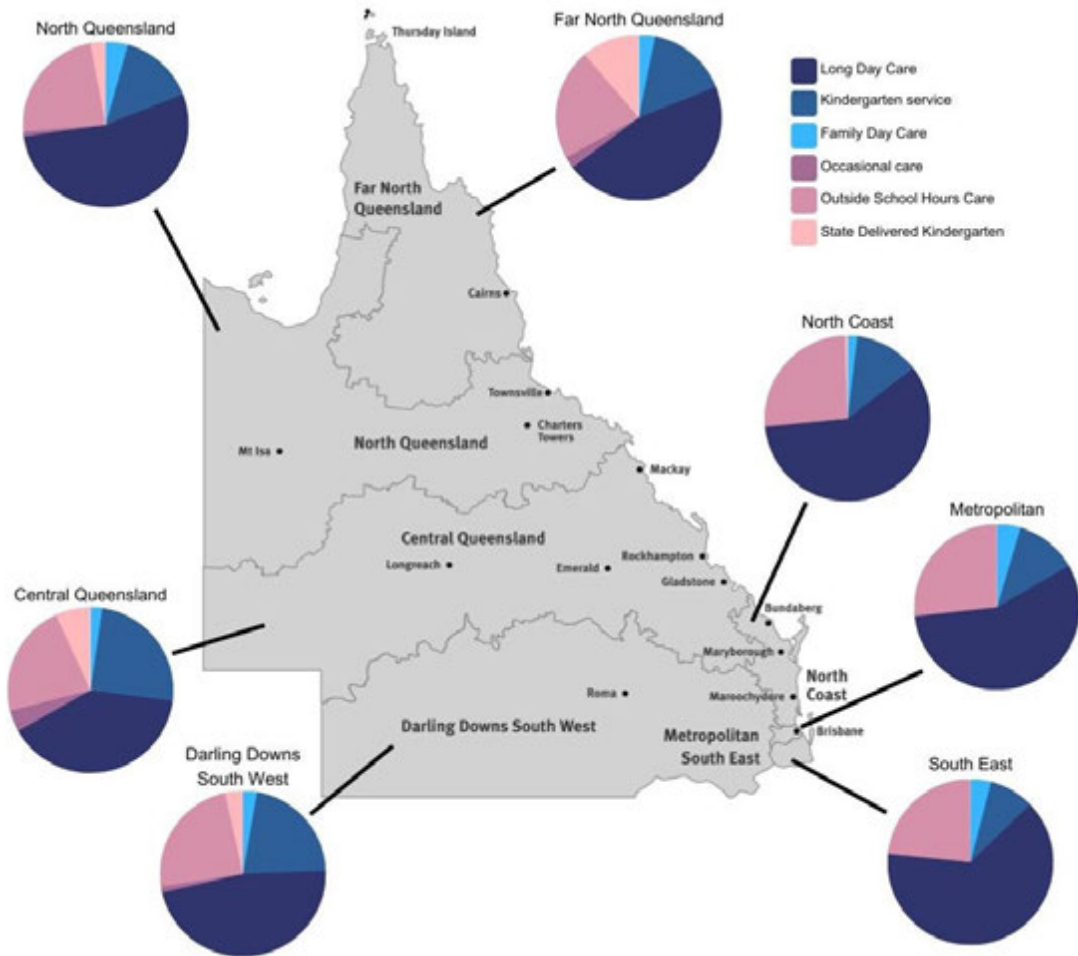
Of all provider types, 50% of services are for-profit providers, while 42% are not-for-profit (NFP) or government-delivered.⁹ In 2022, 132 State Delivered Kindergartens were available in 116 schools across Queensland, mainly in rural and remote communities.¹⁰

Figure 1 shows that Queenslanders tend to have access to different ECEC service types, depending on where they live. Long day care centres, which are majority for-profit services, are less prevalent in regional and rural areas.

⁹ As at April 2023. Department of Education. (2023). Unpublished data. Includes services regulated under the Education and Care Services National Law and the *Education and Care Services Act 2013*, including SDKs providing stand alone care.

¹⁰ In 2022, 71 out of the 132 SDKs (54%) included in the ECEC services Census provided stand alone care under the Queensland Education and Care Services Act. The remainder operated as approved services under the Education and Care Services National Law.

Figure 1: Proportion of ECEC service types by DoE region, 2022¹¹



Currently, 94% of Queensland’s services that are regulated under the NQF have been assessed and rated against the National Quality Standard (NQS). Of these services, 90% have been rated as Meeting or Exceeding the NQS (89% nationally), with Meeting or Exceeding ratings on specific quality areas (QAs) ranging from 92% (for QA1 - educational program and practice) to 98% (for QA4 - staffing arrangements).¹²

Early childhood development outcomes

Figure 2 shows results from the Australian Early Development Census (AEDC) from its commencement in 2009 to the latest census in 2021.

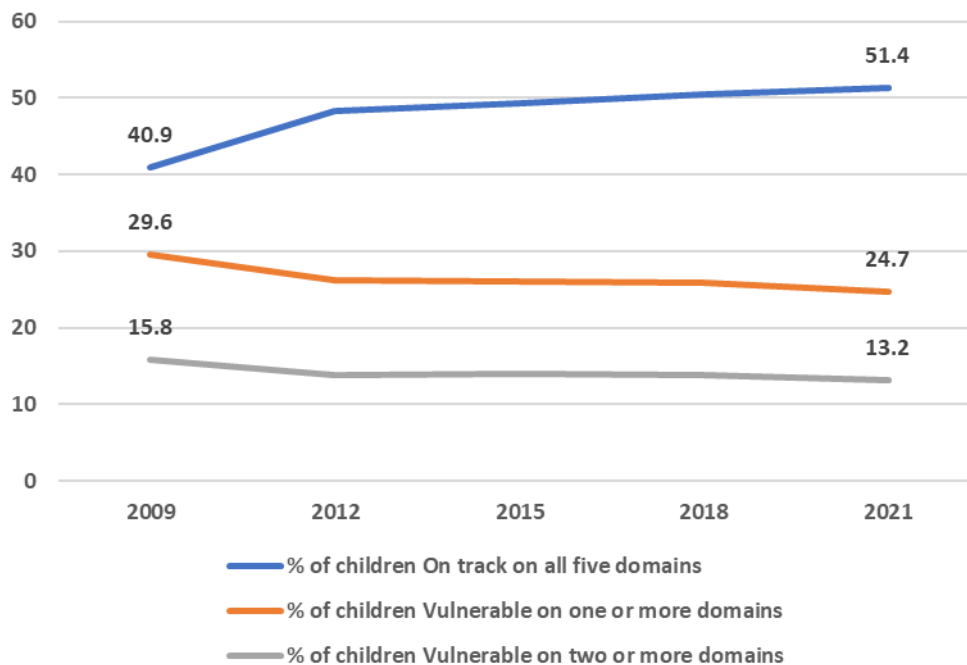
It demonstrates that while 29.6% of Queensland children were developmentally vulnerable on one or more domains of the AEDC in 2009, by 2021 this had dropped to 24.7%. While remaining lower than the national

¹¹ Department of Education. (2023). Unpublished data. Includes services regulated under the Education and Care Services National Law and the *Education and Care Services Act 2013*.

¹² Australian Children’s Education and Care Quality Authority. (2023). *NQF Snapshot Q1 2023*. <https://www.acecqa.gov.au/sites/default/files/2023-05/NQF%20Snapshot%20Q1%202023%20FINAL.PDF>

average (54.8%), Queensland has experienced a significant increase in the proportion of children starting school on track in all developmental domains since 2009 (up from 40.9% to 51.4%).

Figure 2: Queensland AEDC Outcomes – 2009 to 2021¹³



While improvement has not been as pronounced as for non-Indigenous children, one in three First Nations children (33.8%) were assessed as developmentally on track in all five domains in 2021, compared with 21.7% in 2009. The proportion of First Nations children vulnerable on one or more and two or more domains has also decreased over this period (from 50.5% to 42.1% and from 31.3% to 26.9% respectively).

Queensland Government initiatives

The Queensland Government is working with its stakeholders to progress reforms across the sector that will ensure Queensland children have the best start in life.

This includes responding to a range of challenges experienced by Queensland families in accessing early childhood services related to factors such as service availability and cost and facilitating tailored supports for specific cohorts (e.g. First Nations children; students with disability; children from culturally and linguistically diverse backgrounds and children experiencing trauma and other complex issues).

Early childhood education and care initiatives

In June 2023, the Queensland Government announced that from 1 January 2024, kindergarten will be free for all eligible children in Queensland, to help with the cost of living and ensure every child gets a

¹³ <https://www.aedc.gov.au/resources/detail/2021-aedc-national-report>

great start. This will see more than 50,000 children able to attend kindergarten for free in addition to the 14,000 children who already receive free kindergarten. Additionally, this initiative will see families with children attending a community kindergarten realise a cost saving of approximately \$4,600 a year.

The Queensland Government is boosting investment by \$645.4 million over four years (taking total investment in kindergarten to \$2 billion over 4 years, inclusive of anticipated national PRA funding allocations.)

Constituting the most significant funding reform in the early childhood sector in a decade, this recent announcement builds on previous commitments by providing:

- an increase of funding to \$120 million to attract and retain early childhood teachers including a dedicated portion with a focus on attracting staff to services in regional and remote areas by providing help such as relocation expenses and accommodation assistance;
- a boost to the successful Kindy Uplift program of \$20 million to make a total of \$112 million over the next four years with the number of services benefiting growing from 930 to 2,000; and
- an extra \$15 million to boost support for children with disability and additional needs, taking the total to \$91 million.

Providing for a sustainable, qualified early childhood workforce to deliver on these commitments, where early childhood professionals are recognised for their contribution to quality learning outcomes for children, DoE is co-designing a Queensland Early Childhood Workforce Strategy and Action Plan for the early childhood sector, to align with the National Workforce Strategy. This will complement the Queensland Workforce Strategy and its Action Plan which guides workforce-related activities across government to support a coordinated whole-of-government approach.

The Queensland Government recognises that families are critical partners in early education as the first teachers of young children and is continuing to support families with access to ECEC services, through a range of strategies and initiatives. These include:

- *State Delivered Kindergarten*, offered in schools located at least 40 kilometres by road from the nearest approved kindergarten, in a selected, discrete Aboriginal and Torres Strait Islander community or other selected communities where there have been barriers to accessing kindergarten;
- *eKindy*, providing an ‘at-home’ distance kindergarten learning program delivered by early childhood teachers for children in remote parts of Queensland and those who cannot access a centre-based program due to travel, an itinerant lifestyle or medical reasons;
- *KindyLinQ*, providing a play-based program for families and their children aged birth to 3 years in schools in identified locations, guiding families on how to support children’s learning and development at home and supporting transition or connection to kindergarten or other ECEC services;

- *Early Years Places*, delivering integrated services in over 50 communities across Queensland with a mix of programs to support children and families, including playgroup, ECEC, health services, family and parenting support;
- *Pathways for Early Learning and Development initiative*, embedding an early childhood learning and development focus within established family support services to provide support for families with children aged birth to 5 years experiencing multiple and complex issues;
- *Connect 4 Children initiative*, delivered in communities across Queensland where local community partners develop a unique, localised plan to help improve the wellbeing of children aged birth to 5 years old;
- *Kindy uplift*, providing funding to enhance the capability of educators to deliver inclusive kindergarten programs that respond to the learning and developmental strengths and needs of children in the local community (currently more than 900 approved kindergarten program providers have been invited to participate in Kindy uplift, based on key factors of the community and families which indicate that they have the greatest opportunity to improve outcomes);
- *Deadly Kindy Campaign*, focusing on increasing kindy participation and health check rates for Aboriginal and Torres Strait Islander children;
- *Communication programs* to increase kindergarten participation through:
 - targeted webpages to support parents to engage in positive early learning literacy and numeracy activities and promote the importance of families engaging in play and home activities; and
 - various social media platforms that communicate with a wider range of parents and children.
- *Kindergarten Inclusion Support Scheme (KISS)*, supporting sessional kindergarten services to provide inclusive programs that reflect their community's diverse needs, including for children with a disability;
- *Inclusion Ready subsidy*, provided to early childhood service providers for each eligible child enrolled in an approved kindergarten program to support all children's participation and attendance in kindergarten, build educator capability and support children's positive transitions into kindergarten or Prep;
- *Kindergarten Inclusion Service*, provides funding for four specialist organisations: Down Syndrome Queensland; Autism Queensland; Hear and Say; and SPELD Queensland to provide free practical advice, training and support directly to over 2100 services to support the inclusion of children with complex support needs in Kindy;
- *Translating and interpreting support*, enabling early childhood services to access the Translating and Interpreting Service (TIS) to support participation of children from non-English speaking families;

- *Playgroups and other early learning opportunities for babies and toddlers*, ensuring families have access to integrated services and the support of early years professionals;
- *First 5 Forever program*, involving the State Library of Queensland working in partnership with local governments to deliver free early years literacy programs at local libraries and Indigenous Knowledge Centres across Queensland; and
- *Parent supports*, to improve children’s outcomes by enhancing adult wellbeing (including family support programs, and therapeutic and counselling programs such as Parentline and parent groups/peer support).

The Queensland Government also recognises the importance of transition from ECEC to school, and the critical role that the early years of school play in an individual’s life. [*Equity and Excellence: realising the potential of every student*](#) is the Queensland Government’s plan for every state school student, focusing on educational achievement, wellbeing and engagement, and culture and inclusion. Starting strong is a key priority of *Equity and Excellence*, with a view to strengthening protective factors in the early years to improve outcomes and make a positive impact on young people’s lives. Under *Equity and Excellence*, Queensland’s priorities from kindergarten to Year 2 are: knowing each child and student’s needs to support positive and confident transitions into and through school; achievement in English and mathematics; and maximising learning days.

Health and wellbeing initiatives

In addition to specific ECEC services, Queensland supports investment in place based, evidence-informed and locally relevant services that offer targeted and intensive support for diverse children, families and communities. In particular, the Queensland Government is helping families to create a safe and supportive family unit where babies develop and grow into healthy toddlers by:

- promoting community commitment to reduce the incidence of vaccine preventable diseases in children by implementing the actions through implementing the National Immunisation Program;
- accessing and communicating to paediatric specialists the latest research on baby development, health and wellbeing through partnerships with other national and international paediatric specialists, and using exemplars to share knowledge and embed these learnings in practice;
- improving early detection of emerging development problems by encouraging more families to access growth and development checks for their children and associated supports;
- continuing to emphasise the Deadly Ears program’s role in reducing the rates and impacts of middle ear disease and conductive hearing loss for Aboriginal and Torres Strait Islander children across Queensland;
- supporting implementation of the “education and learning” outcome area under Australia’s Disability Strategy and *Queensland’s Disability Plan 2022-27: Together, a better Queensland*; supporting

models that bring health and education providers together noting timely access to developmental screening and support services has the potential to improve lifelong outcomes; and

- promoting Healthy Kids partnerships through which communities of practice bring together local health and education leaders with the ECEC sector.

Additionally, Queensland is reducing transmission risks in ECEC services from contagious conditions through:

- ensuring compliance with the obligations of persons in charge of an ECEC service as per Chapter Five of the *Public Health Act 2005*; and
- service compliance with the guidance in the National Health and Medical Research publication [*Staying Healthy Preventing infectious diseases early childhood education and care services \(updated June 2013\)*](#)

There is a higher risk of transmission of infectious diseases in centre-based ECEC, which poses an ongoing challenge to parents who are reliant on this type of care to allow them to work. It is essential that significant emphasis is given to reducing the risk of infectious disease transmission in ECEC services to not only protect the child, staff and family from illness but also to reduce the financial impact on parents.

Common approaches to supporting and influencing learning, child development and wellbeing outcomes include alignment of services accessed by children and families, targeted and early interventions, and family and parental engagement and support. Child and parent centres are effective in influencing outcomes across the life span of a child. These co-locate or integrate services with common elements of supporting both parents and children, targeting those most at risk of developmental vulnerability, and providing access to quality early learning education and child and family health services.

Further opportunities

In line with available evidence, and in the context of the Commission's review and ongoing national funding and policy discussions, there remains potential to explore further reform opportunities at the national level, including through:

- continued implementation of the National Workforce Strategy and PRA;
- simplification of access to child care subsidies to increase uptake from vulnerable children, e.g. by removing the activity test for the CCS and simplifying processes for accessing the Additional Child Care Subsidy by allowing services to apply for this on behalf of families in all situations;
- considering intersections and coordination between the NDIS, ECEC, and other services in supporting children with disability;

- reviewing existing Certificate III and Diploma level ECEC qualifications to include greater coverage of children's health and development, better supporting educators to help children reach their full potential;
- pursuing partnerships with a range of stakeholders to co-design solutions that address community needs and aspirations, and ensure funding is allocated to where it is needed the most; and
- strengthening the capacity and capability of Aboriginal Community Controlled Organisations to enable self-determination for communities.

Conclusion

Outstanding gains have been made over the last fifteen years in improving the quality of ECEC and increasing access to kindergarten. With all governments working together and in partnership with families, communities and stakeholders, further reforms underway have the potential to similarly enhance the early childhood landscape, supporting both workforce participation and early childhood development across the nation.