

# An Equitable, Multigenerational Approach to Finalizing FY 2016-2018 CCDF State Plans



High-quality child care has long been a dual-generational resource that enables parents or guardians to work, go to school or attend training activities while their young children are cared for in quality early learning environments that support their healthy growth and development. On average, 61 percent of the nation's children from birth to age five<sup>1</sup>, and their families, regularly participate in child care and early learning and development programs. Center-based and family child care providers who work with families on a daily basis are natural partners in helping families build protective factors that mitigate or eliminate risk and actively enhance child and family well-being. From its inception, CSSP's Strengthening Families™ initiative has focused on this opportunity. Unfortunately, the high cost of child care often poses significant challenges for families, particularly those who are poor or low-income. Child care costs vary from state to state and are contingent on such factors as the age of the child and the type of care used (center-based or family child care home). In the Northeast and Midwest, the cost of full-time center-based care for two children is the highest single household expense and is surpassed only by the cost of housing in the South and the West.<sup>2</sup>

The **Child Care and Development Block Grant** (CCDBG)<sup>3</sup> is the primary federal funding source for the **Child Care and Development Fund** (CCDF) program in states, which provides child care subsidies to low-income working families. In most states, it is also the primary funding source for the child care system and infrastructure, as well as initiatives for improving child care quality.<sup>4</sup> While CCDF only reaches 15 percent of the approximately 14.2 million families with eligible children nationwide, there is evidence that families with the lowest incomes are most likely to benefit from the program.<sup>5</sup> Of the 2.2 million eligible children in 2012, the most recent year for which income data are available, 33 percent were from families with incomes below 100 percent of poverty and another 19 percent were from families with incomes between 100 percent and 149 percent of poverty.<sup>6</sup>

## strengthening families™ A PROTECTIVE FACTORS FRAMEWORK

Strengthening Families™ is a research-informed approach to increase family strengths, enhance child development and reduce the likelihood of child abuse and neglect. It is based on engaging families, programs and communities in building five protective factors:

- Parental resilience
- Social connections
- Knowledge of parenting and child development
- Concrete support in times of need
- Social and emotional competence of children

Using the Strengthening Families framework, more than 30 states are shifting policy and practice to help programs working with children and families focus on protective factors. States apply the Strengthening Families approach in early childhood, child welfare, child abuse prevention and other child and family serving systems.

For more information, visit [strengtheningfamilies.net](http://strengtheningfamilies.net).

Due to the funding constraints, state CCDF programs have a limited population reach but they serve a diverse group of children and families. According to 2014 preliminary data released by the U.S. Department of Health and Human Services, the most recent year for which data are available, of the 1.4 million children who received CCDBG subsidies in 2014, approximately 42 percent of were black, 41 percent were white and 21 percent were Hispanic/Latino.<sup>7</sup> However, even when families (particularly those who are low-income) are able to access child care, it is too often of low quality, with low-income parents of children age five or younger being more likely to report concerns about their child’s learning, development or behavior than their peers in higher-income families.<sup>8</sup>

On November 19, 2014, President Obama signed into law the Child Care and Development Block Grant (CCDBG) Act of 2014<sup>9</sup> with broad bipartisan support from Congress—strengthening its dual role as a key early childhood education support for children and a work support for low-income families.<sup>10</sup> The law supports goals intended to improve the health, safety and quality of child care while making it less burdensome for families to access stable child care assistance.<sup>11</sup> Under the law, states are required to develop triennial state plans that identify how they will spend the federal funds. In the spring of 2015, the federal Office of Child Care (OCC) extended the submission deadline for the biennium FY 2016-2018 Child Care and Development Fund (CCDF) State Plans\* to March 1, 2016, providing state administrators with an opportunity to develop high-quality subsidy systems that serve young children and families and the communities in which they live.

The Center for the Study of Social Policy (CSSP) strongly supports efforts to make child care subsidies significantly more responsive to families’ needs and to reduce undue burden. Of particular importance is the law’s new focus

According to the **Personal Responsibility and Work Opportunity Reconciliation Act of 1996**, it is the citizenship and immigration status of children that determines eligibility for CCDBG, regardless of the status of their parents or caregivers. To ensure these eligible children receive child care subsidy, State Lead Agencies should address the following in their State Plans:

1. All applications and subsequent materials must make clear that eligibility is based solely on the status of the child and that any information obtained during the process will not be used for immigration enforcement purposes.
2. Engagement efforts and consumer outreach must be linguistically and culturally responsive to diverse providers and families in safe and accessible spaces.
3. As subsidy eligibility is also contingent on participation in an approved employment or education/training activity, consider ways to reduce undue burden for these families in their attempts to provide this information, such as accepting employer-provided income verification.

and emphasis on family engagement—promoting consumer education efforts to promote greater involvement by parents and family members in the development of their children in child care settings. The new federal requirements align closely with what the research literature identifies as key protective factors that can strengthen all families and promote optimal child development—particularly for those facing multiple risks. By promoting continuity of care for young children and families, addressing the needs of the most vulnerable children and families, empowering parents as consumers and engaging families as partners in the care and development of their children, states have the opportunity to make a truly significant difference in the lives of young children and families.

\* The biennium CCDF State Plan is the submission in which states will be expected to outline their implementation plans for the major changes in policy included in the Child Care and Development Block Grant Act of 2014.

## NATIONAL CENTER ON PARENT, FAMILY AND COMMUNITY ENGAGEMENT

The National Center on Parent, Family and Community Engagement (NCPFCE) supports family well-being, effective family and community engagement, and children’s school readiness, including transitions to kindergarten. NCPFCE’s work includes providing training and technical assistance on:

- staff-family relationship building practices that are culturally and linguistically responsive
- integrated and systemic family engagement strategies that are outcomes-based
- consumer education, family leadership, family economic stability and individualized support for families facing adversity

NCPFCE is the result of a cooperative agreement between the federal Office of Head Start and the Office of Child Care and Boston Children’s Hospital Brazleton Touchpoints Center, in collaboration with Child Care Aware of America, the Center for the Study of Social Policy, and Child Trends. For more information, visit <http://www.acf.hhs.gov/programs/ecd/interagency-projects/ece-technical-assistance>.

As states finalize their FY 2016-2018 CCDF State Plans, there are a number of important considerations that have the potential to positively impact poor and low-income families. CSSP recommends that states consider incorporating policies and actions to:

1. Make high-quality child care and early education programs accessible and affordable for low-income families, particularly those living in underserved areas or in areas with high concentrations of poverty.
2. Reduce churn in early childhood subsidy systems by reducing the documentation, notification and disruption burden on families caused by interim reporting.
3. Ensure eligibility and continuity of care for homeless children and children involved in child welfare systems.
4. Focus on improving outcomes for low-income children and families of color by developing and sustaining early childhood education systems that advance equity.
5. Partner with, support and invest in parents through targeted consumer outreach and parental and family engagement efforts in ways that are linguistically and culturally responsive to diverse populations.
6. Use existing funds through the quality set-aside to invest in the recruitment, training and retention of a qualified, effective and culturally responsive child care workforce.

**MAKE HIGH-QUALITY CHILD CARE AND EARLY EDUCATION PROGRAMS ACCESSIBLE AND AFFORDABLE FOR LOW-INCOME FAMILIES, PARTICULARLY THOSE LIVING IN UNDERSERVED AREAS OR IN AREAS WITH HIGH CONCENTRATIONS OF POVERTY.**

Research shows that participation in high-quality early childhood and school readiness programs improves educational outcomes for low-income children and children from cultural and linguistic minority groups.<sup>12</sup> But many families lack access to affordable, high-quality options.<sup>13</sup> In an effort to increase the quality of child care services, the CCDBG Act of 2014 increases the minimum quality spending requirement to nine percent (phased-in over a five-year period). States must reserve a portion of their funds for activities aimed at improving child care quality, increasing parental options and increasing access to high-quality care which can be provided directly or through grants or contracts with resource and referral organizations or other appropriate entities.<sup>14</sup>

States will also have the ability to reserve a portion of their subsidy for direct service grants and contracts which aim to increase the supply of quality child care for underserved or vulnerable populations by “purchasing” spaces directly from the provider that are reserved for subsidy-eligible families.<sup>15</sup> While the law states that grants or contracts should not be favored over the use of child care certificates, states should consider their use in cases where certificates are insufficient to sustain or expand the market of high-quality options. In such cases, grants and contracts guarantee a stable source of funding which reduces the financial risk for providers and

incentivizes their participation in the subsidy program. States will have the ability to incorporate quality requirements directly into the grants and contracts and use CCDF quality dollars to fund financial incentives (such as tiered payments), targeted training and technical assistance, wrap-around services and other supports that will encourage provider participation and meet the needs of the families they serve.<sup>16</sup>

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**State Example:** Young children and families served in child care centers that utilized grants in **Pennsylvania** benefited from an increased quality of care. Grants enabled centers to both offer services to a wider range of age groups and to begin, or continue, providing services to low-income families.<sup>17</sup> Grants also enabled quality improvements that eventually led some centers to apply for accreditation and provided the opportunity for centers to offer expanded operating hours at the end of the grant period—including weekend and evening hours.<sup>18</sup> This is particularly important for parents or caregivers with volatile or nonstandard schedules, an increasing characteristic of low-wage work, who often times have to develop piecemeal arrangements for the care of their children.<sup>19</sup> Additionally, centers that utilized grants were also able to increase teacher and staff salaries and more centers were able to offer benefits to teachers and staff.<sup>20</sup>

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**REDUCE CHURN IN EARLY CHILDHOOD SUBSIDY SYSTEMS BY REDUCING THE DOCUMENTATION, NOTIFICATION AND DISRUPTION BURDEN ON FAMILIES CAUSED BY INTERIM REPORTING.**

To provide families with stability and facilitate family’s continuous access to child care subsidies, the CCDBG Act of 2014 establishes a 12-month eligibility period for subsidy recipients. While the law does not address interim reporting (and until the finalized CCDF rules are in place to offer clear direction), states should eliminate interim reporting policies in order to actualize continuous 12-month eligibility and eliminate churn—the removal of families from benefits that they are eligible to receive, only to return within a short timeframe. Interim reporting policies tend to be disruptive and cause undue burden in the lives of families, child care providers and the subsidy agencies themselves. In some states, subsidy agencies require parents to report even the most minimal changes in income, employment and work schedule (among others), even if the change will have no impact on their benefit.

States that choose to continue requiring interim reporting should not act on any changes that would decrease or terminate a family’s benefits until the next redetermination period at the end of a full 12 months. These states should additionally consider aligning child care subsidy interim reporting policies with the simplified change reporting used in SNAP in order to reduce duplicative work for states as well as the burden on, and potential confusion for, families who may believe that the state human services office is

already taking into account the information they previously submitted for other programs administered by that same agency.

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**State Example: Delaware** is one of a few states that only requires documentation for verification of employment and income.<sup>21</sup> Once eligibility has been approved, all child care subsidy recipients remain eligible for a full 12-months of assistance and must report changes in their status only when the child moves out of or is removed from the parent's or caregiver's home, the child moves out of state, the child dies or the parent or caregiver does not cooperate with child support requirements.<sup>22</sup> Additionally, the child care parent fee will not change during the authorization unless a parent or caregiver loses his or her job.<sup>23</sup> Delaware has also aligned eligibility periods with other benefit programs administered in the state so that renewal for all programs occurs in one process.<sup>24</sup>

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## **ENSURE ELIGIBILITY AND CONTINUITY OF CARE FOR HOMELESS CHILDREN AND CHILDREN INVOLVED IN CHILD WELFARE SYSTEMS.**

The CCDBG Act of 2014 prioritizes services for “children experiencing homelessness” and children involved with child protective services or children who “need to receive protective services.” The trauma of homelessness or involvement in child welfare systems can be a cause of toxic stress, particularly for young children. Concrete supports, such as access to stable, high-quality child care programs that offer a compendium of wrap-around services, have the ability to provide families with the resources needed to avoid homelessness or involvement with the child welfare system. High-quality child care programs are particularly well-suited to partner with these vulnerable families as they interact with them on a daily basis—responding to their unique needs and building upon their family strengths.

State Lead Agencies should partner with their State Coordinators for Homeless Education, required and funded by the federal McKinney-Vento Homelessness Act and consider the role of local school districts' homeless education liaisons in order to best meet the needs of young children and families who are homeless and ensure their access to quality child care services. Additionally, States should also consider prioritizing services for young children who may not be in foster care, but have a parent who is in foster care or receiving protective services. In any of these instances, States should develop procedures that determine these children and families eligible for subsidy and enroll them prior to completion of all required documentation with a minimum 90-day grace period. These children and families should also be categorically eligible for waivers of income eligibility and work requirements since these rules may not be relevant to their circumstances. In order to build and sustain the supply of services for these young

children and families, States should consider using grants and contracts that couple higher standards of care (including trauma-informed practice, wrap-around services and other supports that are specific to the needs of these vulnerable populations) with financial incentives, training and technical assistance and other supports to providers.

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**State Examples:** In an effort to assist homeless families in becoming self-sufficient, **Virginia's Childcare for Homeless Children Program (CCHCP)** utilizes funds made available through CCDBG to provide homeless families involved in emergency shelters and rapid re-housing programs with a broader range of child care options.<sup>25</sup> Families may begin receiving child care subsidy services when an eligible parent signs the Parent Application for CCHCP Services, when the family begins residing in the emergency shelter or signs a lease in a rapid re-housing program.<sup>26</sup>

**California** offers a variety of child care subsidy programs administered through the Department of Social Services and the Department of Education. Many of the programs streamline enrollment for children receiving child welfare services—in some cases waiving income requirements and giving priority status to children involved in Child Protective Services through the California Department of Social Services.<sup>27</sup>

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## **FOCUS ON IMPROVING OUTCOMES FOR LOW-INCOME CHILDREN AND FAMILIES OF COLOR BY DEVELOPING AND SUSTAINING EARLY CHILDHOOD EDUCATION SYSTEMS THAT ADVANCE EQUITY.**

Across the United States young children of color disproportionately live in low-income households compared to their white counterparts.<sup>28</sup> This is especially troubling as child poverty is associated with a host of negative life outcomes that extend well beyond childhood, including lower rates of academic achievement and educational attainment and higher incidences of antisocial behavior and chronic illnesses.<sup>29</sup>

The CCDBG Act of 2014 strengthens the child care subsidy's role as a work support for low-income families. States should intentionally target CCDF quality expenditures on activities that will demonstrably increase access to high-quality child care settings that focus on improving outcomes for low-income children and families of color. They should also intentionally target outreach and consumer education activities to ensure that low-income families of color are informed and can access subsidies and other services for which they are eligible.

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**State Example:** Recognizing the importance of meeting the needs of a growing population of young children

learning two or more languages at home, [Bright from the Start: Georgia Department of Early Care and Learning \(DECAL\)](#) has emphasized supporting Dual Language Learners (DLLs) through culturally competent professional development and family engagement initiatives.<sup>30</sup> Recognizing that Spanish-speaking DLLs were entering and leaving Georgia's universal pre-K program significantly behind their monolingual English-speaking peers on all outcomes,<sup>31</sup> DECAL decided to provide a summer program to support children from homes where Spanish is the primary language as they transition to pre-K.<sup>32</sup> Using funds primarily made available through CCDBG, Georgia's free Rising Pre-Kindergarten (RPre-K) Program exclusively serves DLL children from low-income families whose predominant home language is Spanish for six weeks during June and July.<sup>33</sup>

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### **PARTNER WITH, SUPPORT AND INVEST IN PARENTS THROUGH TARGETED CONSUMER OUTREACH AND PARENTAL AND FAMILY ENGAGEMENT EFFORTS IN WAYS THAT ARE LINGUISTICALLY AND CULTURALLY RESPONSIVE TO DIVERSE POPULATIONS.**

All too often, parents (particularly low-income parents) lack access to available information about resources that can help them make informed decisions about their young children's care and education. The CCDBG Act of 2014 provides States with the opportunity to use quality set-aside funds to bolster activities that support the training and professional development of the child care workforce—including methods of conducting outreach and engaging parents and families in culturally and linguistically appropriate ways to expand their capacity to support their children's learning and development.<sup>34</sup> The law also requires states to engage in consumer education and outreach activities and explicitly identifies a number of items\* that States must provide to parents receiving child care subsidy, the general public and, where applicable, child care providers.<sup>35</sup>

Consumers are frequently using the internet and other web-based means to access information and the new law prioritizes the development of a national and state-level consumer child care websites to help parents access safe and high-quality child care services in their community, with a range of price options, that best suit their family's needs. In addition to websites and other web-based outreach such as social media and web advertising, States should also take into account meeting the needs of families with limited literacy skills, who may have limited English proficiency and/or lack access to a computer or the internet. Outreach strategies that meet the needs of these groups in a way that is culturally and linguistically responsive should be delivered

\* States must make public information regarding other financial assistance programs that families might be eligible for; programs carried out under the Individuals with Disabilities Education Act (IDEA); research and best practices concerning children's development; policies regarding the social-emotional behavioral health of young children; and information regarding developmental screenings.

through additional means—ideally in environments where families come into direct contact with other individuals in spaces such as pediatricians' offices and other healthcare offices, labor organizations, schools and resource and referral organizations.

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**State Example:** [Connecticut's Family Resource Centers](#) promote comprehensive, integrated, community-based systems of family support and child development services located in public school buildings. These community-based centers provide families with access to a broad continuum of early childhood and family support services that foster the optimal development of children and families.<sup>36</sup> In addition to these centers, the [Connecticut Office of Early Childhood](#) features a number of programs on its website that are available to provide services to help children and their families.<sup>37</sup>

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### **USE EXISTING FUNDS THROUGH THE QUALITY SET-ASIDE TO INVEST IN THE RECRUITMENT, TRAINING AND RETENTION OF A QUALIFIED, EFFECTIVE AND CULTURALLY RESPONSIVE CHILD CARE WORKFORCE.**

By 2020 it is expected that more than half of the nation's children will be a part of a minority racial or ethnic group.<sup>38</sup> Given these current demographics, a key component of quality education programming for young children is a culturally competent, ethnically and linguistically diverse workforce that is well-prepared to foster the healthy development of an increasingly diverse population of young children and families.<sup>39</sup> Culturally competent programs include those that use curriculum, instruction and assessment practices that support home language development; offer professional development opportunities that give teachers the skills to work effectively with diverse cultural and linguistic groups; and engage meaningfully with families.<sup>40</sup>

While the list of allowable quality improvement activities under the quality set-aside mandate is extensive, States should work to develop a cohesive quality improvement strategy that aims to advance child care services and programs that are culturally and linguistically responsive to the children and families that they serve. In an effort to support the continued professional development of child care providers, states should also establish payment practices for child care subsidy providers that aim to increase the supply of high-quality child care services, strengthen the fiscal stability of providers and support the fixed costs of providing child care services by delinking provider payments from a child's occasional absences.

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**State Example:** In 2009, the [Washington State Legislature](#) instructed the [state-level Department of Early Learning \(DEL\)](#) to develop core competencies for early learning professionals that correspond with standard curricular areas in early care and education. The core competencies describe the knowledge and skills professionals need

to work with children ages birth through eight and their families.<sup>41</sup> When integrated into training and professional development opportunities, core competencies promote a consistent level of knowledge and skill among early learning professionals. The application of DEL's core competencies in early learning settings, among other content areas, specify ways in which early learning professionals can fully include children from many cultural, ethnic, linguistic and socio-economic backgrounds.<sup>42</sup> Through the development and implementation of DEL's core competencies, early learning professionals are able to recognize that each family is unique in its structure, values, beliefs, traditions and interactions. As a result, they develop respect for each family's worth and appreciate the richness of diversity that they bring to the early care and education setting by creating environments and experiences that affirm and respect cultural, linguistic, ethnic and socio-economic diversity.<sup>43</sup>

## CONCLUSION

Early childhood is an important time for developing the foundations for positive health, behavioral and educational outcomes through adulthood. The CCDBG Act of 2014 and the requirements of the FY 2016-2018 CCDF State Plans provide states with a unique opportunity to implement policies that will greatly improve the health, safety and quality of child care while also making it significantly more responsive to the needs of children and working families. As states finalize their State Plans and implement the new federal requirements over the course of next three years, we urge administrators to consider the recommendations put forth to maximize the CCDF program's potential as an equitable, multi-generational approach to improving the lives of low-income working families.

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This brief was authored by Rhiannon Reeves, policy and research assistant at CSSP.

The Center for the Study of Social Policy (CSSP) works to secure equal opportunities and better futures for all children and families, especially those most often left behind. Underlying all of the work is a vision of child, family and community well-being which serves as a unifying framework for the many policy, systems reform, and community change activities in which CSSP engages.

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