

Moving to High Quality Child Care for All: Addressing Inequities through CCDBG State Plans



**Center for the
Study of
Social Policy**
Ideas into Action

Introduction

The recent \$2.4 billion increase in federal funding for the Child Care and Development Block Grant (CCDBG)¹ provides States with the resources necessary to fully implement the CCDBG Act of 2014²—improving the health, safety, and quality of child care while making it less burdensome for families to access stable child care assistance³—and expands availability for more than 151,000 additional children.⁴ This increased funding can be used to address inequitable access to high-quality early care and education for working families of color, children from immigrant and mixed-status families, and low-income children and families.

Young children ages birth to four years old are the most racially and ethnically diverse group in the United States (U.S.) population, and diversity in this age group is increasing every year.⁵ At the same time, due to America’s long history of structural racism, young children of color disproportionately live in households experiencing poverty and in communities of concentrated disinvestment. Their parents are overrepresented in the low-wage economy—with its irregular work schedules and few, if any, employee benefits such as health insurance coverage, sick leave, or retirement benefits. Their communities are also more likely to lack high-quality child care options.⁶ As a result, young children of color have disproportionately less access to developmental experiences and opportunities than their White peers, experiences that research and brain science show are critical to children’s early learning, healthy development, and long-term well-being.⁷

As States begin implementing their required CCDBG triennial plans for 2019-2021, Child Care Adminis-

List of Allowable Quality Improvement Activities through CCDBG

Under the CCDBG Act of 2014 and the associated Final Rule, States must spend a portion of their funds on at least one of 10 specific quality improvement strategies listed in the Act to improve child care quality based on a needs assessment. States have wide discretion in how they can invest those dollars to reduce existing inequities in the child care system. The list of allowable activities includes:

1. Supporting training/professional development of the child care workforce.
2. Improving upon the development/implementation of the State’s early learning and developmental guidelines by providing technical assistance to eligible providers that enhances cognitive, physical, social, and emotional development (including early childhood development) of participating preschool and school-aged children.
3. Developing, implementing, or enhancing a tiered quality rating system.
4. Improving the supply and quality of infant and toddler care programs.
5. Establishing/expanding a statewide system of child care resource and referral services.
6. Facilitating compliance with State requirements for inspection, monitoring, training, health and safety, and State licensing standards.
7. Evaluating quality and effectiveness of child care programs.
8. Supporting providers seeking accreditation by a national body.
9. Supporting efforts to develop high-quality health, mental health, nutrition, physical activity, and development program standards.
10. Carrying out other activities determined by the State to improve quality of care for which measurement of outcomes related to provider preparedness, child safety, child well-being, or Kindergarten entry is possible.



trators and other State policy leaders should use this opportunity to improve the quality of, and expand access to, child care for low-income families of color. As we discuss in more detail below, States can use this funding to:

- Use Data to Drive Decision-Making
- Prioritize Enrollment and Minimize Administrative Burdens for Working Families of Color
- Invest in Inclusive, Strategic Outreach to Engage and Inform Consumers
- Prevent Expulsion and Suspension of Children from Care
- Increase Families' Access to Developmental Screening
- Raise Provider Reimbursement Rates and Payment Policies to Incentivize High-Quality Care That is Accessible to Working Families of Color
- Invest in a Diverse, Highly-Skilled Early Education Workforce

Recommendations

States can take the following actions to increase access to high-quality child care for low-income working families of color and immigrant and mixed-status families. Specific steps are included under each recommendation below. While some points listed have the potential to benefit all CCDBG subsidy recipients, families living in areas of concentrated disinvestment (which are historically communities of color and native communities) would primarily benefit from these recommendations as they face the greatest barriers to accessing high-quality services. Including these recommendations serves to emphasize the benefits to families of color.

Use Data to Drive Decision-Making

Data has the ability to aid administrators in their efforts to connect to children and families in greatest need of resources and identify gaps in the current supply and quality of care available to them. States can examine Child Care and Development Fund (CCDBG) enrollment data to understand which families are, and are not, able to access child care subsidies. They also have the ability to investigate the underlying causes of inequitable access for families of color to inform outreach efforts and remove administrative barriers. The increase in CCDBG funding provides an opportunity for States to conduct a comprehensive workforce study to understand the composition, knowledge and skill level—as well as future profes-

Hearing Directly from Families and Communities

Giving families and communities a direct voice in data collection and analysis can help ensure that policy and investment decisions are relevant to family-identified needs and most likely to achieve the intended outcomes. States can:

- Collect data directly from families of color, families with the lowest incomes, and English Language Learner (ELL) families who are eligible to receive child care assistance via surveys or focus groups.
- Include subsidy-eligible families in State and community-level decisions-making processes to ensure that investments in quality improvement are responsive to the needs of diverse groups of families. Offer stipends or reimburse families for costs associated with their participation (e.g., transportation, child care, personal investments of time).





sional development needs—of child care providers and professionals. These data can offer valuable insights into the current baseline and help identify both immediate and long-term opportunities for strengthening the skills, knowledge, and diversity of the workforce.

What States Can Do

To assess gaps in access and quality for families of color, States can:

- Identify families who could most benefit from CCDBG subsidy—where are they located, what are their specific needs and who are the highest priority families (e.g. English Language Learners or ELLs, families experiencing homelessness, families living in extreme poverty).
- Survey families to assess their needs and child care preferences (home-based or center-based).
- Compare subsidy participation rates by racial and ethnic groups, income level, and communities. Use this and needs assessment data to identify families who are eligible, but do not apply for the child care subsidy. Work with local leaders to conduct outreach in those communities.
- Invest in coordinated data and information systems infrastructure that connect public services and program data so that families only have to submit information one time (e.g., birth certificates and identification) for multiple programs including child care assistance.
- Use CCDBG enrollment data to identify families who may also qualify for other services and benefits, such as home visiting, Medicaid, or nutrition assistance. Share these data with relevant administering agencies and families to improve access to a range of supports.

To assess the diversity of the current child care workforce, states should take action to:

- Partner with institutions of higher learning or other researchers to gather information about the current composition of the child care and early learning workforce by age, gender, race and ethnicity, areas of residence and employment, education and training levels, compensation and benefits, and primary language.
- Conduct surveys or focus groups of providers of color to understand their preferences for, and barriers to, professional development and training opportunities. For example, States should collect information about:
 - Providers' preferred language, location, and times for participating in training or credit-bearing course work (including whether it should be accessible by public transportation).
 - Providers' preference for online or in-person training opportunities.
 - The extent to which degree requirements or other policies that seek to raise the education level of the child care workforce might positively or negatively impact workers.

Prioritize Enrollment and Minimize Administrative Burdens for Working Families of Color

Under the CCDBG Act of 2014, States are required to use at least 70 percent of their CCDBG funds for services to children and families (excluding administrative costs) and to prioritize child care assistance for families facing significant barriers such as those receiving assistance from or transitioning off of Temporary Assistance to Needy Families

(TANF). States must also describe in their triennial plans how they will give priority to children from families in areas that have significant concentrations of poverty and unemployment. States also have discretion to prioritize enrollment for additional categories of children and families as well, providing them with an opportunity to increase access to high-quality early learning experiences for working families of color, low-income families and those living in poverty, and immigrant and mixed-status families.

State policies related to eligibility and redetermination can pose significant obstacles to families working in low-wage jobs, who are disproportionately families of color and families headed by single women. The frequency of eligibility redetermination, as well as the number and types of information and documentation required (e.g. pay stubs from several employers, social security numbers, birth certificates, etc.) are all factors in a family's ability to receive and retain access to child care assistance. Providing this sensitive information places undue burden on families who often times have to take off of work and make child care and transportation arrangements in order to present these required documents in person. Provisions of the 2014 CCDBG Act seek to improve access and stability for families by requiring that states establish 12-month eligibility regardless of changes in a parents' income, work, education, or training activities; limitations on what types of documentation states can require during interim reporting processes; and guidance on setting family copayment policies. More importantly, states are prohibited from requiring in-person visits to report

interim changes to family income or employment/education status, and must offer a range of options for how families can notify agencies of changes. However, States have discretion over how they define, collect, and verify eligibility requirements.

What States Can Do

- Set additional priority categories to increase access to child care assistance for families living in communities with the highest concentrations of poverty or with the greatest number of young children of color whose families are low income.
- Identify as a priority category refugee families and families whose home language is not English.
- Eliminate or reduce sliding fee scales and family co-payments for families in priority communities.
- Remove unnecessary questions on child care subsidy applications that ask for sensitive information such as all household family members' names and social security numbers.⁸
- Invest in, and establish, phone, email, and other automated options for reporting and submitting information, and offering multiple locations and non-standard office hours for in-person reporting (e.g. evenings and weekends).
- Coordinate redetermination processes and requirements across multiple public benefits and supports, including child care assistance, to minimize the administrative burden on families.
- Ensure that information regarding eligibility and redetermination requirements is delivered in a timely manner using multiple platforms (e.g. electronically and post mail) and is available in multiple languages and written to be culturally responsive and inclusive.



Improving Access to Children in Mixed Status Families

In the U.S., the vast majority of young children living with an immigrant parent are themselves, U.S. citizens. In instances where these parents may be undocumented, families are hesitant in accessing public benefits programs for which they are legally eligible. 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. In addition, collaborations with Head Start programs and funded child care subject to public educational standards are exempt from immigrant restrictions.* To ensure eligible children receive child care subsidies, States should consider the following:

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 work and/or education/training schedules as employment verification.

* Center for Law and Social Policy. (2017). Immigrant Eligibility for Federal Child Care and Early. Washington, DC: Center for Law and Social Policy. Available at: <https://www.clasp.org/sites/default/files/publications/2017/04/Immigrant-Eligibility-for-ECE-Programs.pdf>

access safe and high-quality child care services in their community, with a range of price options, and find the care that best suits their family's needs.

While these websites have the ability to reach numerous families, families with limited literacy skills, ELL families, and families who lack access to a computer or the Internet do not benefit from them. Outreach strategies that meet the needs of these groups in a way that is culturally and linguistically responsive should be delivered 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.

What States Can Do

- Implement appropriate outreach and new enrollment strategies based on data collection for families of color, immigrant and refugee families, and communities with high concentrations of poverty.
- Train intake workers on culturally responsive messaging and practice and, when possible, hire intake workers who are from or reflective of the communities in which they serve.
- Survey families regarding where they get their information, who their trusted sources are, and what communications strategies—such as Internet, phone, or post mail—are most likely to reach them.
- Ensure consumer education information and materials are culturally and linguistically responsive, translated into multiple languages, and available in multiple formats while also being offered in various venues and on numerous media platforms, such as radio and television.
- Include information regarding how and where to access additional public benefits and services along with child care such as nutrition assistance programs and health care assistance.

Prevent Expulsion and Suspension of Children from Care

A critical barrier to accessing high-quality early care and education for many families, particularly families with young boys of color, is the practice of suspension and expulsion from care. Research shows that a number of factors affect the disproportional rates of

Invest in Inclusive, Strategic Outreach to Engage and Inform Consumers

All too often, parents lack access to available information about resources that can help them make informed decisions about their young children's care and education. This is especially true for low-income families who may not have access to the mediums through which information is typically shared, such as the internet, or for ELL families, those who may not be able to read, and therefore understand, the materials due to the language in which the information is provided. The CCDBG Act of 2014 caters to consumers who frequent the internet by prioritizing the development of national and state-level consumer child care websites. These websites are intended to help parents

these practices for children of color, and especially for young Black boys. Racial differences in child behavior reveal that children of color and white children act out at the same rates,⁹ however research has found that early childhood teachers are more likely to look for challenging behaviors among Black boys than among any other group.¹⁰ For providers who are not representative of the students for whom they care, or who are not trained in culturally responsive techniques, they may negatively perceive young boys of color and implement punitive practices that are not developmentally appropriate or responsive. A lack of training and support on trauma-informed care; positive behavioral supports and effective practices to support children's social-emotional development; training, support, and policies to promote family engagement that fosters positive provider-family relationships; and implicit bias of teachers, directors, and staff¹¹ are also factors that contribute to boys of color being overly disciplined in child care settings.

What States Can Do

- Use CCDBG dollars to collect and publicly report data on the number of children suspended and expelled from programs who receive child care subsidy payments, disaggregated by race and ethnicity, gender, family income, community, or jurisdiction.
- Invest in training and capacity-building among staff and program administrators on implicit bias, social and emotional development, trauma-informed care, parent and family engagement, and positive behavioral supports.¹²
- Examine and revise, as necessary, early learning guidelines and standards so that they are culturally

and linguistically responsive to families of diverse cultures and those whose home language is not English.

- Integrate standards on culturally and linguistically responsive family engagement practices into continuous quality improvement processes (e.g., Quality Rating and Improvement Systems or QRIS).

Increase Families' Access to Developmental Screening

Developmental screening, when conducted as recommended during the early years of life, is critical to catching developmental delays and assessing needs early, when preventative treatment and support are most likely to make a difference.¹³ Unfortunately, racial and ethnic disparities exist in the early diagnosis and treatment of developmental and behavioral conditions prior to Kindergarten entry.¹⁴ Lack of access to developmental screenings and supports has resulted in children of color being disproportionately represented in public special education beginning as early as Kindergarten. States should use funds made available through CCDBG to increase access to developmental screening

The U.S. Department of Health and Human Services and the Department of Education issued a joint policy statement and recommendations to assist states and public and private early childhood programs to prevent expulsions and suspensions in early learning settings. For more information and additional resources, see Reducing Suspension and Expulsion Practices in Early Childhood Settings at <https://www.acf.hhs.gov/ecd/child-health-development/reducing-suspension-and-expulsion-practices>.





and services to meet the needs of the children and families identified by such efforts. Increasing collaborations between health care and child care providers while improving training and the cultural competency of providers can help to reduce these disparities.¹⁵

What States Can Do

- Use CCDBG quality dollars to make information about developmental screening available to providers to share with parents in multiple languages—including how to access screening, and what rights families have to request screening.
- Invest in training and coaching of child care providers on developmental screening, particularly in those communities where such screening is in low-supply. Ensure the training:
 - Includes information that providers can share with parents on how to find follow-up supports when needed; and
 - Strengthens providers' capacity to share information with families in a way that is culturally responsive, situated to meet families best needs, and respectful of parents' primary role.
- Explore the possibility and long-term cost-benefits of investing or expanding comprehensive early childhood referral systems like Help Me Grow¹⁶ that connect families to supports and services in their community.

Raise Provider Reimbursement Rates and Payment Policies to Incentivize High-Quality Care That is Accessible to Working Families of Color

Research shows that underpaid and overworked child care providers offer worse quality care due to the stress of their jobs. These workers are also more likely to quit,

leaving the children and families in their care to bear the brunt of a lack of continuity in child care providers. This problem is persistent in communities experiencing high concentrations of poverty, disproportionately affecting families of color and ELL families. Under the CCDBG Act of 2014, States are required to demonstrate that their payment rates for child care providers who accept subsidies ensure equal access to child care services that are comparable to those provided to other families. States must also demonstrate how provider payment practices allow for stable funding for providers (who are predominantly low-income women of color) and encourage them to serve children receiving CCDBG subsidy. The CCDBG law and the additional funding together provide States with the opportunity to establish payment practices for child care subsidy providers that aim to increase the supply of high-quality child care services, strengthen the financial stability of providers and support the fixed costs of providing child care services by delinking provider payments from a child's occasional absences.

What States Can Do

- Raise overall reimbursement rates for providers accepting child care subsidies so that they match the federal recommended 75th percentile of the current market rate (as measured in a market rate survey within the last three years) or by an alternative cost model.
- Offer additionally higher payment rates (i.e., tiered reimbursement) to remove barriers to access for families of color. For example, set higher rates for: 1) providers in communities with high concentrations of families of color experiencing poverty; 2) providers that offer non-traditional hours that meet the scheduling needs of low-wage workers; or

3) providers that employ bi- or multi-lingual staff.

- Use direct grants or contracts with providers to ensure stable funding that is sufficient to sustain child care programs in communities with a large number of families of color who are experiencing poverty.
- Pilot a shared services model to test whether centralizing management functions of several child care centers or family child care providers works to decrease operational costs and improve the viability, sustainability and quality of child care programs in communities with low supply.¹⁷
- Use funds to make minor renovations as needed to early childhood facilities in communities with child care shortages and where a majority of residents are individuals and families of color who are at, near, or below the poverty threshold.

Invest in a Diverse, Highly-Skilled Early Education Workforce

Given the diversity of young children today, a key component of quality early education programming 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. Child care providers are often representative of the communities in which they serve, enabling them to establish a trusted rapport with the children and families in their care. This allows them to communicate useful sources of information to families, connecting them to additional resources and supports when possible. The CCDBG Act of 2014's regulations require States to adopt a training and professional development framework that addresses professional standards and competencies, career pathways, advisory structures, articulation

agreements, workforce data, and financing. Training and professional development must also improve the diversity of the child care workforce and increase retention of providers—supporting Indian tribes or tribal organizations that receive CCDBG funds, and generally preparing all CCDBG providers to work with varying age groups, English Language Learners (ELLs), children with developmental delays or disabilities, and Native American families (to the extent practicable). States can use quality set-aside dollars to pay for these investments.

What States Can Do

- Integrate a focus on equity, anti-bias training, culturally and linguistically responsive practice, effective strategies for teaching ELL children, and family engagement into its workforce development system.
- Integrate an equity focus within the State's core knowledge and competencies frameworks, professional development registries and offerings, and QRIS.
- Provide scholarships or fellowships for providers from underserved communities to increase their qualifications and pursue necessary certifications.
- Offer incentives for child care programs in high priority communities to recruit, train, and adequately compensate staff who are from the community or are otherwise representative of the families they serve.
- Invest in training, coaching, and technical assistance that is accessible and language appropriate for providers who speak languages other than English.



Conclusion

High-quality child care serves as a unique means to address the needs of entire families, caregivers and children. By fully funding the CCDBG Act of 2014, Congress has provided states with an opportunity to implement equitable policies that will greatly improve the health, safety and quality of child care while also making it significantly more accessible and responsive to the needs of working families and their children.

As states begin to spend down these newly available and much needed resources, administrators should seize the opportunities provided by these newly allocated CCDBG funds to implement targeted strategies that specifically work to combat disparate outcomes experienced by young children and families of color, immigrant and mixed status families, and children and families living in poverty. By intentionally focusing on children and families facing the most significant barriers, States can make steps toward ensuring that those who have been most impacted by systemic and institutional discrimination have access to the resources and opportunities needed to actualize their success—a worthy investment and benefit to us all.

¹ CCDBG is also commonly referred to as the Child Care and Development Fund (CCDF) and the two terms may be used interchangeably. Matthews, H., Schulman, K., Vogtman, J., Johnson-Staub, C., & Blank, H. (2017). Implementing the Child Care and Development Block Grant Reauthorization: A guide for states. Retrieved from <https://www.clasp.org/sites/default/files/publications/2018/05/Updated%20CCDBG%20Reauthorization%20Guide.pdf>.

² “Child Care and Development Fund (CCDF) Program.” 81 Fed. Reg. 67438. September 30, 2016. Final Rule of Available at: <https://www.gpo.gov/fdsys/pkg/FR-2016-09-30/pdf/2016-22986.pdf>.

³ Ibid.

⁴ CLASP. “Child Care in the FY 2018 Omnibus Spending Bill.” March 2018. Available at: <https://www.clasp.org/sites/default/files/publications/2018/03/Child%20Care%20in%20the%20FY%202018%20Omnibus.pdf>.

⁵ Forum on Child and Family Statistics. POP3 Race and Hispanic Origin Composition: Percentage of U.S. Children Ages 0–17 by Race and Hispanic Origin, 1980–2017 and Projected 2018–2050. Available at: <https://www.childstats.gov/americaschildren/tables/pop3.asp>.

⁶ Johnson-Staub, Christine. “Equity Starts Early Addressing Racial Inequities in Child Care and Early Education.” CLASP, December 2017. Available at: https://www.clasp.org/sites/default/files/publications/2017/12/2017_EquityStartsEarly_0.pdf.

⁷ Ibid.

⁸ Some states ask applicants for this information although it is not a federal requirement. Many families, however, may interpret the presence of these questions on a formal application as a requirement, which may deter families with no legal status even when their children are eligible.

⁹ Malik, Rasheed. “4 Disturbing Facts About Preschool Suspension.” Center for American Progress, March 2017. Available at: <https://www.americanprogress.org/issues/early-childhood/news/2017/03/30/429552/4-disturbing-facts-preschool-suspension/>.

¹⁰ Nova, Cristina and Rasheed Malik. “Suspensions Are Not Support: The Disciplining of Preschoolers With Disabilities.” Center for American Progress, January 2018. Available at: <https://www.americanprogress.org/issues/early-childhood/reports/2018/01/17/445041/suspensions-not-support/>.

¹¹ U.S. Department of Health and Human Services and U.S. Department of Education. “Policy Statement on Expulsion and Suspension Policies in Early Childhood Settings.” November 2016. Available at: https://www.acf.hhs.gov/sites/default/files/eecd/expulsion_ps_numbered.pdf.

¹² For resources on equity and implicit bias in early care and education, see UNC Frank Porter Graham Child Development Institute. Race, Culture, and Ethnicity Committee. Available at: <http://fpg.unc.edu/race-culture-and-ethnicity-committee>.

¹³ Zuckerman, K.E. et al. “Racial, ethnic, and language disparities in early childhood developmental/behavioral evaluations: a narrative review.” *Clin Pediatr (Phila)*, 53, no. 7, June 2014, pp. 619-631.

¹⁴ Houshyar, Shadi. “Opportunities to Strengthen Developmental Screening for Children Involved in Child Welfare Systems.” Center for the Study of Social Policy, April 2018, p. 2. Available at: <https://www.cssp.org/policy/2018/Developmental-Screening-FINAL.pdf>.

¹⁵ Ibid.

¹⁶ For more information on Help Me Grow, visit <https://helpme-grownational.org/>.

¹⁷ For more information on shared service models for child care providers, see “Shared Services Central.” Opportunities Exchange. Available at: <http://opportunities-exchange.org/shared-services-central/>.