

THE CHILD CARE AND DEVELOPMENT BLOCK GRANT LAW: WHAT IT MEANS FOR PARENTS IN LOW-WAGE JOBS

The National Women's Law Center and CLASP

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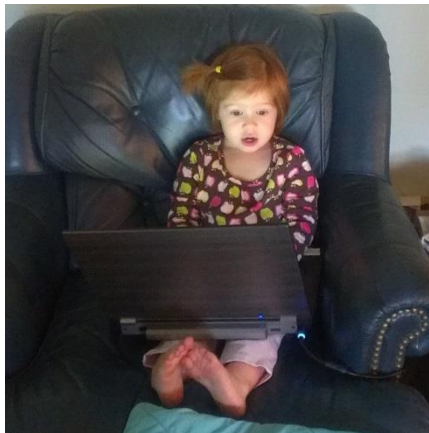


Today's Webinar

- Importance of supporting parents in low-wage jobs
- Provisions in the Child Care and Development Block Grant (CCDBG) reauthorization that affect parents in low-wage jobs
- Strategies for taking advantage of these provisions to support child care providers serving parents in low-wage jobs
- Other early care and education policies that can help parents in low-wage jobs



**Submit questions at any time using the
Chat BOX**



Mothers in Low-Wage Jobs

- One in five working mothers of very young children (ages three and under) work in low-wage jobs.
- Individuals in low-wage jobs not only struggle with limited incomes, but often have unpredictable, irregular schedules and frequently must work at night, in the early morning and/or on the weekend.
- Difficult work schedules can pose problems for parents not only in obtaining stable child care but also in accessing child care assistance due to policies that are often structured for parents with standard work schedules.

CCDBG Law Overview

- The new CCDBG law provides an opportunity for states to better meet the needs of parents in low-wage jobs with nonstandard or irregular schedules.
- The law aims to:
 - Improve the health and safety of children in care.
 - Enhance the quality of care.
 - Make it easier for low- and moderate- income families to access child care assistance that supports stable and continuous care.



CCDBG Law Offers Opportunities...and Risks

- The law includes a number of provisions that give states greater flexibility to adapt their policies for parents in low-wage jobs with difficult work schedules.
- States should take full advantage of this opportunity to increase access to child care assistance and expand the availability of child care options for these parents.
- States should also take care in implementing new requirements that they do not reduce access to options such as family, friend and neighbor (FFN) care that might be the best (or only) option for parents in low-wage jobs with nonstandard schedules.

Increasing the Supply and Quality of Child Care for Parents with Difficult Work Schedules

What the Law Says:

- States must describe in their state plans how they will increase the supply and improve the quality of child care for a number of specific populations, including children who receive care during non-traditional hours.
- States are permitted to differentiate payment rates based on certain factors, including whether a provider offers care during non-traditional hours.

Increasing the Supply and Quality of Child Care for Parents with Difficult Work Schedules

What States Can Do:

- Provide direct contracts or grants to providers willing to offer care during non-traditional hours.
 - Contracts or grants offer a predictable income stream to providers that may be otherwise reluctant to provide care during evening, overnight, early morning, or weekend hours.
 - States may incorporate higher payment rates or bonuses into grants or contracts to offer additional incentives to providers to offer this care.
 - States can also use contracts to extend the day or year of Head Start, Early Head Start, or state prekindergarten programs for parents who need additional hours of care for their children.

Increasing the Supply and Quality of Child Care for Parents with Difficult Work Schedules

What States Can Do:

- Provide higher payment rates for care offered during evening, overnight, early morning, and weekend hours.
 - Most states' payment rates are currently below recommended levels.
 - States should ensure that they both set adequate base rates for care during standard hours and establish a differential for nonstandard-hour care that is large enough to serve as an incentive.

Increasing the Supply and Quality of Child Care for Parents with Difficult Work Schedules

What States Can Do:

- Develop innovative strategies to increase the supply and quality of care during non-traditional hours.
 - Technical assistance to providers on offering care during nonstandard hours.
 - Financial resources for providers offering care during non-traditional hours to help them improve quality, in addition to higher rates.
 - Support for FFN caregivers, including training, materials, books, and other supplies.



Expanding Access to Child Care Assistance for Parents with Difficult Work Schedules

What the Law Says:

- Once a child has been determined eligible for child care assistance, states must consider the child eligible for a minimum of 12 months regardless of temporary changes in a parent's work, education, or training activities, or family income, as long as income does not exceed 85 percent of state median income (SMI).
- States must describe how their redetermination procedures and policies do not require working parents, and in particular parents receiving Temporary Assistance to Needy Families (TANF), to disrupt employment in order to comply.
- States must demonstrate how they will take into account irregular fluctuations in parent's earnings when determining and redetermining eligibility.

Expanding Access to Child Care Assistance for Parents with Difficult Work Schedules

What States Can Do:

- Eliminate or simplify interim reporting during the 12-month eligibility period.
 - While the law does not address interim reporting requirements (for example, to verify that the family's income remains below 85 percent of SMI throughout the 12-month period), the provision establishing the minimum eligibility period signals the importance of facilitating families' continuous access to child care assistance over an extended time.
 - Eliminating or simplifying interim reporting is particularly important for parents in low-wage jobs, whose income and work hours often fluctuate.

Expanding Access to Child Care Assistance for Parents with Difficult Work Schedules

What States Can Do:

- Adopt policies and processes for determining and redetermining eligibility that allow maximum flexibility for parents. For example:
 - Allow parents to renew their eligibility online or by phone.
 - Offer services during extended business hours.
 - Give parents a long timeframe during which they can renew eligibility.

Expanding Access to Child Care Assistance for Parents with Difficult Work Schedules

What States Can Do:

- Ensure that income variations do not impede parents' access to assistance. In determining eligibility, or redetermining eligibility for a new 12-month period, states can:
 - Average a parent's income over an extended period.
 - Request representative paychecks rather than the most recent paychecks
 - Disregard temporary income.
 - Take other steps so that parents are not deemed ineligible for assistance simply because their income rises for a week or a short period.

Improving Payment Practices for Providers to Accommodate the Needs of Parents with Difficult Work Schedules

What the Law Says:

- States must implement (to the extent practicable) enrollment and eligibility policies that delink provider reimbursement rates from an eligible child's occasional absences.
- States must certify that payment practices for providers receiving CCDBG assistance reflect generally accepted payment practices for providers serving children who do not receive CCDBG assistance.

Improving Payment Practices for Providers to Accommodate the Needs of Parents with Difficult Work Schedules

What the States Can Do:

- Pay providers for absent days, or based on a child's enrollment rather than attendance.
 - Practices that match those in the private sector enable providers to have more predictable income, making it more likely that providers will agree to serve families receiving child care assistance.
 - These policies can help increase providers' willingness to serve families with parents working nonstandard hours, since the providers will be assured of payment even if a child's attendance varies with his/her parent's work schedule.
 - Paying for absent days or on an enrollment basis also makes it more likely that a provider will agree to hold a slot for a child, even if the parent works an erratic schedule.

Improving Payment Practices for Providers to Accommodate the Needs of Parents with Difficult Work Schedules

What States Can Do:

- Pay providers using the time units employed by the provider.
 - If a provider has a flat monthly fee for private-paying parents whose children are in care for a certain number of hours per month, the state can reimburse using a monthly rate, rather than reimbursing by hour, by day, or by week.
 - This approach helps parents whose work hours—and the hours they need child care—vary from week to week or day to day.



Implementing New Requirements for Child Care Providers Without Limiting Options for Parents with Difficult Work Schedules

What the Law Says:

- States must conduct a pre-licensing inspection and unannounced annual inspection for all regulated and licensed providers receiving CCDBG funds, and one **annual inspection** for license-exempt providers (except providers related to all children in their care) receiving CCDBG funds.
- States must ensure that providers (including license-exempt providers) receiving CCDBG funds complete minimum pre-service or orientation **health and safety training** as well as ongoing training.
- States must require all employees of child care providers—i.e., all licensed, regulated, and registered child care providers as well as all license-exempt providers receiving CCDBG funds, except for relative providers—to undergo **comprehensive criminal background checks** prior to employment and to maintain employment.

Implementing New Inspection Requirements for Child Care Providers Without Limiting Options for Parents with Difficult Work Schedules

What States Can Do:

- Provide support for license-exempt providers through the annual inspections process.
- Use inspections not as an enforcement mechanism, but as an opportunity to offer technical assistance and resources—such as fire extinguishers, child safety plugs, smoke detectors, first aid kits, and other supplies to help providers meet standards, as well as educational materials for children and providers—to improve the health, safety, and quality of care of these providers.

Implementing New Training Requirements for Child Care Providers Without Limiting Options for Parents with Difficult Work Schedules

What States Can Do:

- Make training easily accessible for all types of providers.
 - Training opportunities should be available to all providers, including license-exempt providers.
 - Training should be accessible for providers through many avenues (both online and community-based) and should be affordable.
 - Training should be offered in multiple languages.
 - Providers should be permitted to complete the training shortly after they begin caring for children (during an orientation period), rather than being required to complete the training before caring for children. This flexibility allows providers to be available for parents with unpredictable work schedules who may have a sudden, immediate need for child care.

Implementing New Background Check Requirements for Child Care Providers Without Limiting Options for Parents with Difficult Work Schedules

What States Can Do:

- Ensure that it is feasible for providers to comply with the requirement to undergo background checks and that the process is fair to providers and does not unduly burden them.
 - Under the law, states are permitted to charge providers a fee for costs associated with processing applications and administering a criminal background check, but are prohibited from charging more than the actual cost to the state.
 - States must complete a background check within 45 days of the request for the check.
 - States must have policies and procedures in place for individuals to appeal the findings of the criminal background checks.

Other Ways States' Child Care Policies Can Support Parents in Low-Wage Jobs

- Allow parents to receive child care assistance to attend school without imposing burdensome work requirements or other limitations.
- Allow parents' child care assistance to cover sleep time for parents working overnight and to cover transportation time.
- Allow license-exempt providers serving families receiving CCDBG to participate in the Child and Adult Care Food Program (CACFP).

Other Ways States' Prekindergarten and Home Visiting Policies Can Support Parents in Low-Wage Jobs

- Help parents in low-wage jobs access prekindergarten for their children.
 - Support prekindergarten options in these families' neighborhoods.
 - Provide transportation between prekindergarten and wrap-around child care.
 - Conduct extensive outreach to encourage participation.
 - Provide full-day reimbursement for child care when prekindergarten operates on a part-day schedule or when the hours of the prekindergarten program fall outside of the parent's work hours.
 - Support FFN providers who care for children before and/or after the prekindergarten day.
- Offer supports to FFN providers through home visiting programs.

Moving Forward

- Implementation will be challenging—it's complex, with many new requirements and time constraints
- Seizing opportunities will require resources—now is the time for budget advocacy at the federal and state level.
- Make the case for funding FFN care.
- Explain to policy makers that child care assistance is key to helping mothers work.
- Let us help!
- What provisions are most challenging in your state?
- What information is needed?



Implementing the CCDBG Reauthorization: A Guide for States

- Detailed information on provisions in the new CCDBG law
- Recommendations and cautions for states
- State-specific information on key provisions of the law, CCDBG funding, and children served.
- Available at www.nwlc.org and www.clasp.org/CCDBG

