Work Support Strategies:















A New Vision for Child Care

By Gina Adams and Hannah Matthews¹ May 2014

This brief is based on *Confronting the Child Care Eligibility Maze: Simplifying Child Care and Aligning with Other Work Supports*, an in-depth guide to the policies and practices that allow states to simplify and align child care assistance, improve service delivery for clients, and reduce administrative burden for agencies. The in-depth guide is available online at www.urban.org and www.clasp.org.

The Child Care Eligibility Maze

The Child Care and Development Fund (CCDF), or Child Care and Development Block Grant (CCDBG), is intended to help defray the costs of child care for low-income working families with two main program goals: to help parents become or remain employed and to support the safety and development of their children. These goals can be compromised, however, by complex and burdensome administrative policies and processes that make it challenging for low-income families to get and keep child care assistance. Moreover, most families receiving child care assistance also receive other benefits, such as nutrition assistance through the Supplemental Nutrition Assistance Program (SNAP) or public health insurance through Medicaid or the Children's Health Insurance Program (CHIP). Simultaneously navigating multiple benefit programs, often with overlapping or duplicative eligibility requirements, compounds the burden on families. This cross-system duplication also creates administrative burdens for public agencies and can contribute to program integrity challenges in CCDF.

Policymakers and others are increasingly realizing that these combined challenges undercut the ability of CCDF and other work supports to achieve their goals—both for clients and for agencies. It makes it more

Work Support Strategies (WSS) is a multistate initiative led by CLASP in partnership with the Urban Institute and the Center on Budget and Policy Priorities. It provides a select group of states with the opportunity to design, test, and implement more effective, streamlined, and integrated approaches to delivering key supports for low-income working families, including health coverage, nutrition benefits, and child care subsidies. The Ford Foundation is the project's lead funder. The Open Society Foundations, The Annie E. Casey Foundation, The Kresge Foundation, and JPMorgan Chase & Co. have provided crucial additional support. For more information, go to www.urban.org/worksupport.

difficult for parents to get the help they need to remain employed and for children to benefit from the continuous care that supports their healthy development. It also hampers state and local agency efforts to meet the needs of their clients in an efficient manner, delivering important and necessary services. As a result, states are seeking a new way of doing business, one that focuses on improving client access and retention of benefits, along with increasing service delivery efficiency and accountability.²

A New Approach for Child Care: Simplification and Alignment

Recognizing the challenges described above, state and federal policymakers are embracing new approaches that *simplify* access to benefits within CCDF, and that link and *align* key elements of CCDF eligibility across other core benefit programs such as SNAP, Medicaid, and CHIP, in order to better serve families and improve program efficiency.³ This approach is creating a new vision—one in which, for example, eligible parents applying for child care assistance could submit their application or redetermination information one time, be easily connected to child care as well as the larger package of benefits for which they are eligible, and be able to keep their benefits as long as they are eligible with minimal burden to themselves and public agencies.

At the federal level, efforts to simplify SNAP and Medicaid/CHIP have taken place over the past decade, and the recent passage and implementation of the Affordable Care Act (ACA) offers an additional opportunity for modernization. The federal Office of Child Care (OCC) has also made "family friendly policies" a primary goal of its efforts in recent years. In doing so, OCC has highlighted the importance of both simplifying CCDF policies and processes and of aligning and linking CCDF with other work support programs. In May 2013, OCC released a Notice of Proposed Rulemaking that suggested family-friendly changes to CCDF regulations, including establishing 12-month eligibility periods, reducing redetermination burdens, and aligning redetermination with other programs and policies. ⁴ The U.S. Senate has also passed a child care reauthorization, which includes many similar provisions. ⁵

While the federal government plays a large role in shaping policy and regulations in the other benefit programs, states play a larger role in setting child care policies within a broad federal framework. The significant flexibility that states have to set policies in CCDF provides great opportunity to align with other programs.

If done thoughtfully, this process can yield immense benefits:

- Clients get the supports they need to stabilize their families and employment, and they are able to retain benefits with minimal burden, despite changes in circumstances.
- Agencies and front-line workers do not duplicate efforts across systems when programs are able to share information.
- Families that apply for, but do not receive, child care assistance because of limited funding are connected to other benefits that help meet their health and nutrition needs.

The specifics of this approach look different from state to state. While a few states have created a single, integrated system, where one worker handles all benefit programs, this is just one option among many approaches (see text box). States may choose to align or integrate key pieces of their programs or may explicitly choose to *not* align some policies if doing so would have negative impacts on families.⁶

Selected Examples of State Alignment Strategies

Idaho has aligned CCDF eligibility with SNAP. The state recently set its CCDF income eligibility at 130 percent of the federal poverty level, which aligns with SNAP. The state also indexed income eligibility to rise with inflation, ensuring that the alignment would stay in force over time. A coordinated review for clients receiving SNAP and CCDF is conducted after six months of participation in the programs. Idaho has also reduced reporting requirements, aligning with SNAP, by requiring that families only report an income change that would make them ineligible for child care assistance. The state has a multi-benefit application and an online portal for applying for services, renewing benefits, and reporting changes.

New Hampshire has coordinated eligibility across SNAP, Medicaid, CCDF, and TANF, offering a single application for all four programs. The state works to align documentation and verification practices across programs. Clients receive 12-month eligibility for child care. When a family receives multiple benefits, the state synchronizes redetermination dates for SNAP, TANF, and Medicaid. At redetermination, clients use a simplified review form and do not have to provide verification for items that have not changed since the initial eligibility determination (e.g., identity, date of birth). An online portal allows clients to screen, apply for, and track multiple benefits, including child care.

North Carolina uses SNAP data to deem income eligibility for child care assistance. The state instituted this policy after determining that approximately 90 percent of child care recipients also receive SNAP (which the state calls Food and Nutrition Services, or FNS). FNS income data is considered valid for both initial eligibility determination and redetermination. Caseworkers may not require families to provide additional income information. Parents are asked to verify that the FNS information is accurate. North Carolina made adjustments to the FNS data system so workers can view individuals' income data and adjust for differences in the way programs count the family unit.

Oklahoma aligns policies for child care assistance with SNAP and Medicaid as often as possible, with SNAP the main driver. All programs—child care, SNAP, Medicaid, and TANF—are housed in the same division of Oklahoma's Department of Human Services and use a common computer system for delivery, as well as a common intake system that holds all information for a client. While all data is housed together, only information counted or required for an individual program is considered for eligibility determination. Oklahoma has successfully standardized the verifications required by programs and linked their recertification processes.

For additional examples and references, see Part III of Confronting the Child Care Eligibility Maze.

The Nuts and Bolts of Simplification and Alignment

States should assess a range of policies and practices to better understand how their program works for agencies and for families. By considering basic questions about how families access child care assistance, states can begin to unearth a complex web of requirements:

- Who is eligible for help and how does one demonstrate eligibility?
- How long can clients keep their benefits and what do they have to do to retain them over time?
- What happens if something changes in their lives, such as a loss of earnings or change in employment?

A look across the key components of child care programs can help to identify places ripe for simplification and/or alignment. For example:

- Eligibility Elements and Definitions. States can simplify child care eligibility criteria (i.e. income eligibility limits) to the core essentials and then align these criteria and definitions (for example, who counts in the family unit or what is countable income) across programs, while also standardizing when possible how these elements are operationalized across programs.
- **Documentation and Verification.** States can simplify and align documentation requirements across programs. In addition, states can allow flexibility on the documentation required for verification, ensuring they only verify information that cannot be verified from other sources. States can also streamline processes by using eligibility determinations from other programs.
- **Application and Enrollment Accessibility.** States can make applications and submission more accessible by providing application assistance; addressing language and literacy barriers; and creating multi-benefit applications.
- Eligibility Redetermination. States can standardize to annual redetermination periods and align periods and processes across programs. States can also align redetermination dates across programs so families only have to renew once each year.
- **Interim Change Reporting.** States can minimize changes that must be reported, simplify how families report changes, and minimize how often the state acts upon reported changes.

Note: Please see the full paper for more detailed descriptions of the above, along with examples of state approaches and policies.

How to Begin the Process of Simplification and Alignment

States have found the following steps helpful to get started on the process of simplifying CCDF and aligning programs:

- Reflect on program goals and motivation. How does simplifying child care access, improving retention, and creating alignments with other programs support those goals?
- Thoroughly and carefully assess program policies, processes, and implementation. Such an assessment should include soliciting perspectives from many people/programs/constituents, considering *all* options for possible improvement, and using outside expert facilitators.
- Use data thoughtfully to improve services, bolster overall program evaluation, and provide feedback to office managers about program efficiency and service delivery.
- Examine business and technology processes to identify where service delivery approaches may inadvertently undercut simplification and alignment efforts.
- Seek solutions across policy and program areas. Policy workgroups across programs can play an important role in cross-systems alignment.
- Understand that addressing the most difficult issues may require multiple strategies, including
 possible changes in policy, regulation, staff training, administrative practices, technology, and
 data collection.

Conclusion

Public benefit programs, including child care subsidies, are critical to the well-being and economic success of low-income families and their children's development. Despite the real challenges, this is a time of opportunity in which a number of realities are converging to help make a strong case for states to take deliberate steps to simplify their child care systems, and to align and connect them with other key safety net programs. Forthcoming regulatory or statutory changes to CCDF will move states to simplify policies; CCDF administrators and others can also learn from simplification efforts in other programs, such as SNAP and Medicaid. While the efforts discussed here are not simple, lessons learned through WSS and other state initiatives offer a variety of strategies to improve services and systems for families.

¹ Rhiannon Reeves, Research Assistant at CLASP, also contributed to this brief.

² Golden, Olivia, ed. 2013. "New Perspectives on Transforming States' Health and Human Services: Practical Commentaries on the First Year of the Work Support Strategies Initiative." Washington, DC: The Urban Institute. http://www.urban.org/publications/412833.html.

³ Mills, Greg, Jessica F. Compton, and Olivia Golden. 2011. "Assessing the Evidence about Work Support Benefits and Low-Income Families: Rationale for a Demonstration and Evaluation." Washington, DC: The Urban Institute. http://www.urban.org/publications/412303.html; Rosenbaum, Dorothy, and Stacy Dean. 2011. "Improving the Delivery of Key Work Supports: Policy and Practice Opportunities at a Critical Moment." Washington, DC: Center on Budget and Policy Priorities. http://www.cbpp.org/cms/index.cfm?fa=view&id=3408.

⁴ At the time this paper was written, the proposed rules are draft and the content of the final rules is unknown.

⁵ In March 2014, the U.S. Senate passed the Child Care and Development Block Grant Act of 2014, the first step in reauthorizing CCDBG for the first time in nearly 20 years. At the time of writing, the U.S. House of Representatives has not released a reauthorization bill. It is unknown whether the House will act on CCDBG reauthorization this year or what the content of a final reauthorization would be.

⁶ For example, reducing income eligibility for subsidies to align with income eligibility of other programs or terminating child care benefits because of failure to provide documentation for another program.