

Variation in CCDF Family- Friendly Administrative Practices: What Varies, and Why and How it Matters for Families and Children

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Session Overview

Background and Overview of Subsidy Implementation Decisions that

Affect Families and Children -- Gina Adams, The Urban Institute

Administrative Data as a Tool to Understand Variation in Local Practices and Implementation, and Implications for Child/Family

Outcomes – Elizabeth Davis, University of Minnesota

Findings on the Implementation of a Family Friendly Policy in

Massachusetts – Erin Hardy, Brandeis University

Discussant – Julia Henly, University of Chicago

Q&A and discussion

“Family Friendly Policies:” Policy Implementation Decisions That Can Affect Outcomes for Families and Children

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CCDF Reauthorization: A New Focus on Family Friendly Policies

- Establishes a 12-month eligibility re-determination period for CCDF families, regardless of changes in income (as long as income does not exceed the federal threshold of 85% of State median income) or temporary changes in participation in work, training, or education activities.
- Allows States the option to terminate assistance prior to re-determination if a parent loses employment, however assistance must be continued for at least 3 months to allow for job search.
- Eligibility re-determination should not require parents to unduly disrupt their employment.
- Provides for a graduated phase-out of assistance for families whose income has increased at the time of re-determination, but remains below the federal threshold.

From Child Care and Development Block Grant Act (CCDBG) of 2014: Plain Language Summary of Statutory Changes, November 18, 2014

<http://www.acf.hhs.gov/programs/occ/resource/ccdbg-of-2014-plain-language-summary-of-statutory-changes>

Subsidy Policy and Implementation Decisions That Affect Access and Continuity of Care

- Drawn from Adams & Matthews, *Confronting the Child Care Eligibility Maze: Simplifying and Aligning with Other Work Supports*, Dec 2013 (link on last page). Supported by the Annie E. Casey Foundation.
 - Full report written prior to CCDF reauthorization focusing on simplification and alignment of child care.
 - Has state examples, policies, and practices from working with states and CCDF Policies Database.
- Product of the Work Support Strategies (WSS) Initiative, which has worked with 6 states to help align key work supports (SNAP, Medicaid, and child care) for working families
- WSS is a partnership between CLASP, the Center for Budget and Policy Priorities, and Urban; supported by the Ford, Casey, Open Society, and Kresge Foundations, and JP Morgan Chase and Co.

Eligibility Criteria and How They Are Operationalized...

How eligibility is defined, determined, and verified affects the ease/ complexity of every step parents go through to get and keep subsidies: application, enrollment, redetermination, and interim reporting of changes

- Are eligibility criteria limited to core required elements?
 - Only required elements are age of child, income of family, reason for needing care, citizenship status of child – all others are at state discretion
- How are eligibility elements operationalized?
 - Defining family unit, income, income limits, countable income & disregards
 - How are qualifying activities defined – to simplify it is useful to define activities broadly, be flexible in requirements re minimum hours of activity, do not require match between hours in activity and child care schedule

...Eligibility Criteria and How They Are Operationalized...

State eligibility authorization policies affect the quality of care families can access -- specifically:

- How states define and authorize part-time care
- How/whether states authorize and pay for variable schedules
- Whether states require that child care hours match work/activity hours

These policies affect whether the care parents are authorized to use matches the business practices and care offered by higher-quality providers

Note: these policies also related to reauthorization language about establishing policies that reflect generally accepted payment practices for child care providers

...Eligibility Criteria and How They Are Operationalized

Simplify documentation and verification policies and practices:

- seek documentation and verification only for elements that affect eligibility
- simplify documentation requirements for eligible activities
- align documentation requirements across programs
- allow flexibility as to what documentation is required for verification
- only verify information that has changed
- ask parents to verify only information that cannot be verified from other sources
- use eligibility determinations from other programs as sufficient verification
- simplify submission of information (including allowing updates online and using electronic customer accounts, submission by email, text, fax, or phone)

Simplify Processes for Determining and Monitoring Eligibility: Application and Enrollment

- How accessible is the application and application submission? Can it be done in many forms (online, in person, by mail)
- How easy/difficult is the application to complete
- Is application assistance available, and does the state address language and literacy barriers
- Are applications integrated across other benefit programs... effectively?

Simplify Processes for Determining and Monitoring Eligibility: Redetermination

- How long are redetermination periods (*annual now required*)
- How easy/difficult is the redetermination process (reminders, pre-populated forms, allow by mail/on-line, make assistance available, etc.)
- Are redetermination periods, dates, and processes aligned across programs (including using ex-parte review or administrative renewal)
- Focus on cases about to close due to failure to complete redetermination

Simplify Processes for Determining and Monitoring Eligibility: Interim Change Reporting

- Avoid having interim reporting effectively function as another redetermination
- Minimize changes that must be reported – for example, only require reporting of major changes in income, interruption of activity, and changes in household
- Simplify reporting process – for example, simplified change forms, change centers to simplify reporting, self-service portals
- Minimize how often the state acts upon reported changes – i.e. changing copayments, changing authorized hours, etc. Only change if in interest of client or required under federal law
- *Note: Unclear whether forthcoming CCDF regs will address these issues*

Conclusion

- Reauthorization requirements for “family friendly” policies important first step
- However, a host of more subtle policy decisions and implementation practices will affect the impact of the new requirements, and whether the state subsidy program is family friendly
- Essential to know state level policy decisions, but local implementation can vary widely and undercut the intent of the policy—state-level staff may not even know local implementation practices
- Understanding both state policy/practice decisions and local implementation practices is essential in any effort to assess the effects of a policy

Resources

- CCDF Policies Database, funded by OPRE, managed by the Urban Institute

<http://www.urban.org/research/publication/ccdf-policies-database-book-tables-key-cross-state-variations-ccdf-policies-october-1-2013>

- Gina Adams and Hannah Matthews, *Confronting the Child Care Eligibility Maze: Simplifying and Aligning with Other Work Supports*, Dec 2013

<http://www.urban.org/research/publication/confronting-child-care-eligibility-maze>