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INFORMATION MEMORANDUM

To: State, Territorial, and Tribal Lead Agencies administering child care programs under the Child Care and Development Block Grant (CCDBG) Act, and other interested parties such as financial aid offices of higher education institutions, child care resource and referral agencies, and school guidance counselors.

Subject: Supporting Parents in Job Training and Education Programs with Child Care Assistance

References: The Child Care and Development Block Grant Act of 1990, as amended, 42 U.S.C. § 9858 et seq.

Purpose: This Information Memorandum provides guidance to Lead Agencies implementing provisions of the Child Care and Development Block Grant (CCDBG) Act of 2014, to increase access to child care assistance and information so that low-income parents may further their education and training as a pathway to better wages and economic stability.

Background: The Child Care and Development Fund (CCDF), authorized by the CCDBG Act, has the potential to support two generations on the pathway to economic mobility by providing child care assistance to low-income parents who are working or pursuing education/training, as well as access to quality early learning experiences for their children. Education and training can improve the employability and long-term earnings of low-income parents. However, lack of access to affordable and stable child care that meets their children’s needs can keep parents from enrolling in or completing educational programs that would improve family economic mobility.

The proportion of students seeking higher education who are also parents is substantial. Of the 21 million low-income parents, one in ten participates in education and training.¹ According to a study from the Institute for Women’s

¹ Eyster, Lauren, Tom Callan, and Gina Adams. 2014. “Balancing School, Work, and Family: Low-income Parents’ Participation in Education and Training.” Washington, DC: Urban Institute.

Policy Research, 4.8 million college students were parents of dependent children in 2011, approximately 26 percent of all undergraduates in 4-year colleges that year. Seventeen percent of community college students are single parents and a significant percentage attend school while working full or part time. Of those students who are parents, 71 percent are women.

Higher educational attainment is linked to better earning potential over a lifetime

Higher educational attainment is linked to greater lifelong earning potential and lower unemployment rates.² The median earnings for women ages 25 to 34 with a bachelor’s degree or higher, working full time and full year compared to women in the same age range with high school diplomas rose from 43 percent in 1971 to 70 percent in 2011.

Earnings and unemployment rates by educational attainment, 2015		
Education attained	Unemployment rate in 2015 (Percent)	Median weekly earnings in 2015
Doctoral degree	1.7	\$1,623
Professional degree	1.5	1,730
Master's degree	2.4	1,341
Bachelor's degree	2.8	1,137
Associate's degree	3.8	798
Some college, no degree	5.0	738
High school diploma	5.4	678
Less than a high school diploma	8.0	493
All workers	4.3	860

Note: Data are for persons age 25 and over. Earnings are for full-time wage and salary workers.
 Source: Current Population Survey, U.S. Department of Labor, U.S. Bureau of Labor Statistics

² Bureau of Labor Statistics. 2015. “Earnings and Unemployment Rates by Educational Attainment.” Washington, DC: U.S. Department of Labor. www.bls.gov/emp/ep_table_001.htm These education categories reflect only the highest level of education attained. They do not take into account completion of training programs in the form of apprenticeships and other on-the-job training, which may also influence earnings and unemployment rates. For more information on training, see: http://www.bls.gov/emp/ep_education_training_system.htm.

These parents will face difficulties supporting their children and reaching a level of economic success that would allow them to no longer qualify for or need child care assistance.³

Parent education levels are meaningful to children's kindergarten readiness

Higher parental education levels and better kindergarten readiness are linked. Research has demonstrated that in particular, the mother's education level is a strong predictor of children's cognitive development and academic achievement.⁴ Yet more than half (58 percent) of the 12 million low-income parents have just a high school credential or less. Thus, efforts to support low-income mother's education advancement through policies that allow them to be eligible for child care assistance while earning a postsecondary degree have a two-generation positive impact.

The supply of child care on higher education campuses is shrinking

While the number of college students who have children seems to be growing, the availability of child care on campuses has not. According to the Institute for Women's Policy Research, in the decade between 2005 and 2015, the availability of campus child care at 2- and 4-year institutions dropped in 36 states and only one state increased availability.⁵ The percentage of campuses that have onsite child care at 2-year and 4-year higher education institutions has decreased. In 2003-2005, roughly 55 percent of 4-year institutions offered campus child care to its student parents, but by 2015, this decreased to 49 percent.⁶ In the same period, public 2-year colleges experienced a greater decline, from 52 percent in 2002 to 44 percent.⁷ Fewer than half of the more than one thousand community colleges operate child care for its students – as well as its faculty and surrounding communities.⁸

Student parents with low-incomes may need additional child care options beyond campus child care in order to be successful in their pursuit of education. For example, they may need care for hours that they work or study, in addition to the hours they are in class. Almost half of low-income parents in education and training were working at the same time.⁹ They may live far from the site of their

³ Pew Research Center. February, 2014. "The Rising Cost of Not Going to College." Retrieved from <http://www.pewsocialtrends.org/2014/02/11/the-rising-cost-of-not-going-to-college/>

⁴ Julia B. Isaacs and Katherine Magnuson. 2011. *Income and Education as Predictors of Children's School Readiness*. Washington, DC: Brookings Institution.

⁵ Briefing Paper: Child Care for Parents in College: A State-by-State Assessment. September 2016. Washington, DC: Institute for Women's Policy Research. Relying on data from the U.S. Department of Education, National Center for Statistics. *Integrated Postsecondary Education Data Systems. 2015 Institutional Characteristics Component (2015 Preliminary Release)*. .

⁶ Institute for Women's Policy Research. July 2016. *Quick Figures: Student Parents' Access to Campus Child Care Continued to Decline in 2015*. Washington, DC.

⁷ Ibid.

⁸ Ibid.

⁹ Eyster, Lauren, Tom Callan, and Gina Adams. 2014. "Balancing School, Work, and Family: Low-income Parents' Participation in Education and Training." Washington, DC: Urban Institute.

education/training and prefer to have child care in their neighborhood rather than bringing their children on the long commute to school.

CCDF provides child care assistance to parents who enroll in educational programs

Forty-eight states and territories reported in their CCDF Plan for Fiscal Years 2016 -2018 that their policies allow parents to qualify for CCDF assistance on the basis of some kinds of education and training participation alone, and eight require a combination with work.¹⁰ In practice, these parents may or may not be prioritized to receive child care assistance. According to preliminary estimates from fiscal year 2014, 8 percent of parents qualified for CCDF assistance due to education or training, and an additional 8 percent qualified due to education or training combined with employment. By comparison, the fiscal year 2012 data showed 11 percent qualified based on education or job training and 8 percent qualified from a combination with work.¹¹ There is great variation among states and territories in the specifics of what types of educational programs are allowable and conditions placed on the parents who qualify. For example:

- **Required work hours:** Eight states do not allow parents to qualify for CCDF assistance on the basis of education and training participation alone.¹²
- **Limited time periods:** Several states limit the length of time that a parent can receive child care while the parent is enrolled in an education program.¹³
- **Limited types of educational programs:** In seven states, postsecondary education does not qualify for assistance.¹⁴ Twenty-four of the states and territories do not allow Education as a Second Language (ESL) courses to qualify for child care assistance.¹⁵
- **Online postsecondary education:** Two states do not consider online education as a qualifying activity for child care assistance.¹⁶
- **Minimum number of credit hours, satisfactory progress or grade point average:** Some states require parents to be enrolled in a minimum number of credit hours per semester if not enrolled full-time. Six states require verification that the parent is making satisfactory progress in the

¹⁰ State and Territory CCDF Plans for Fiscal Years 2016 to 2018. Retrieved from <http://www.acf.hhs.gov/occ/resource/state-plans>

¹¹ Child Care and Development Fund Statistics, Office of Child Care, U.S. Department of Health and Human Services. Retrieved from <http://www.acf.hhs.gov/occ/resource/ccdf-statistics> Table 10

¹² Fiscal Years 2016 – 2018 CCDF State and Territory Plans.

¹³ Ibid.

¹⁴ The CCDF Policies Database Book of Tables. Key Cross-State Variations in CCDF Policies as of October 1, 2014. Office of Program Research and Evaluation, Administration for Children and Families, U.S. Department of Health and Human Services. Washington, DC. October 2015

¹⁵ Ibid.

¹⁶ Ibid. (Idaho; Louisiana)

education program, which may include a specified minimum grade point average.¹⁷

CCDBG Reauthorization. The bipartisan CCDBG Act of 2014 (hereinafter referred to as the “Act”) that was signed into law on November 19, 2014,¹⁸ reauthorized CCDF for the first time in nearly 20 years. The Act made sweeping changes intended to improve the health, safety, and quality of child care, and provide more stable and continuous child care assistance to families, representing a historic shift in the program to better balance the dual goals of promoting economic stability for low-income families and the healthy development and school readiness of children. On September 30, 2016, the Administration for Children and Families, Office of Child Care published a final rule to update the CCDF regulations based on the reauthorized Act.¹⁹

Many provisions of the revised statute and regulations will benefit parents in education programs who rely on child care assistance to be successful. For example, parents will have more stable child care assistance, including extending children's eligibility for child care to a minimum of 12 months, regardless of increases in parents' earnings (as long as income remains at or below the Federal eligibility limit) and temporary changes in participation in work, training, or education. The final rule provides that “temporary change” at § 98.21(a)(1)(ii) includes, at a minimum: (1) Any time-limited absence from work for an employed parent due to reasons such as need to care for a family member or an illness; (2) any interruption in work for a seasonal worker who is not working between regular industry work seasons; (3) any student holiday or break for a parent participating in training or education; (4) any reduction in work, training, or education hours, as long as the parent is still working or attending training or education; and (5) any cessation of work or attendance at a training or education program that does not exceed three months or a longer period of time established by the Lead Agency.

This Information Memorandum provides an overview of how Lead Agencies can take action to support parents with child care assistance so they can participate in and complete education programs that will give them better employment options and income.

Guidance: This Information Memorandum offers examples of policies and practices that can aid Lead Agencies as they determine the most appropriate strategies for supporting parents who need child care assistance to participate in educational programs. One purpose of the CCDBG is to assist in delivering high-quality, coordinated early childhood care and education services to maximize parents' options and support parents trying to achieve independence from public assistance.²⁰ Lead Agencies should consider how child care eligibility policies

¹⁷ State and Territory CCDF Plans for Fiscal Years 2016-2018

¹⁸ Pub. L. No. 113–186.

¹⁹ 81 Fed. Reg. 67438.

²⁰ 42 U.S.C. §9857(b)(4).

and strategies can enable parents to enroll in and complete job training and education, including postsecondary education, which can in turn help them find higher paying employment to support their children. The following is not meant to be a checklist of required activities and policies, but rather a menu of options that the Lead Agency should strongly consider to better support the learning and skill development of two generations through the CCDF program.

The following are strategies for consideration by Lead Agencies and their program partners:

Allow Student Parents to Qualify for Child Care Assistance Without Significant Additional Work Hour Requirements and Other Conditions

Federal law and regulation allow families to qualify for child care assistance based on participation in job training or education alone; however, many states add other requirements that could deter or impede student parents from qualifying. Lead Agencies should review their subsidy eligibility policies to remove barriers such as requiring a large number of work hours in addition to training and education participation. In addition, states should ensure that front line staff and eligibility workers are trained to correctly recognize and determine student parent eligibility and support their particular needs.

Allow Child Care Assistance for the Full Range of Education Programs

Some states and territories provide child care assistance to parents based on the type of educational level. Given the data on lifelong wages for individuals with a college degree compared to lower educational level, states should include Associate and Bachelor degree programs in addition to high school diploma, vocational technical programs, and GED. Other states include parents enrolled in college, but not adult literacy or English language acquisition. Some parents may not be able to enter into better jobs or education opportunities without first improving their basic skills in reading and writing or learning English. Lead Agencies should consider their population of low-income families and the challenges they face to earning better wages. They should review their policies to ensure that child care assistance is accessible to low income parents along the continuum of training and education they may need to address their particular gap in skills or education they seek to address.

Provide Child Care during Schedule Breaks and Associated Time Related to Education Participation

Congress established requirements in the Act that will provide more stable child care financial assistance to families, including extending children's eligibility for child care for a minimum of 12 months, regardless of increases in parents' earnings (as long as income remains at or below the Federal eligibility limit) and temporary changes in participation in work, training, or education.²¹ This will

²¹ 42 U.S.C. § 9858c(c)(2)(N).

make it easier for parents to maintain employment or complete education programs and supports both family financial stability and the relationship between children and their caregivers. Under the law, Lead Agencies that choose to end assistance prior to 12 months due to a non-temporary change in a parent's work, training, or education participation, must continue assistance for a minimum of 3 months to allow for job search activities.

Some Lead Agencies set limits on the amount of time needed to complete training or education programs. According to the National Center for Education Statistics, 60 percent of first-time students enrolled full-time in the fall of 2008 in a bachelor degree program completed their degree within 6 years (58 percent at public institutions; 65 percent at private nonprofit institutions).²² That may be longer for part-time students. Time limitations should be reviewed to ensure they are in sync with the time it takes working individuals, who also have family responsibilities, to complete a program or degree. Lead Agencies should consult with state and local workforce development systems and higher education systems to understand the typical time for completing a training or education program for parents with work and/or family responsibilities.

Being a student requires time commitments beyond the class time itself that require child care. If classes are held on a campus or school site, there will be time to travel to and from class, whether travelling from work or home. Study time, whether an in-person or online course, also requires a parent's full attention and cannot be successfully undertaken while also taking care of a child. Oklahoma's CCDF Plan for Fiscal Years 2016-2018 notes that "child care is limited to time the client participates in actual classroom attendance, including travel time, as well as any activities required to complete a course or maintain a scholarship." Minnesota's CCDF Plan provides that "a person is also defined as attending education during applicable meal, break and travel time."

Coordinate with Higher Education

Lead Agencies should consider creating a coordinated system of consumer education for parents enrolling in training or educational programs. Lead Agencies should consult with community and 4-year colleges and other education programs for data on how many of their students are also parents of young children. Together, the Lead Agencies and education institutions and systems can review how barriers to child care assistance impact parents' ability to finish education programs and the types of child care options that these parents need, including accessible child care providers for odd-hour care during weekend and evening classes.

For example, the Community College of Aurora, Colorado, was awarded a Strengthening Working Families Grant in summer 2016 from the U.S. Department of Labor. Their project, *Access to Success: Expanding Access to*

²² U.S. Department of Education, National Center for Education Statistics. (2016). *The Condition of Education 2016* (NCES 2016-144), [Undergraduate Retention and Graduation Rates](#)

Education + Child Care = Economic Success, will use the grant to fund child care navigators (among other uses) to help participants who are bridging skills in order to be ready for college find high-quality child care and assistance in paying for it.²³ The Family Child Care Network at California State University, Northridge, a program of the Associated Students Children's Center, has a Network Coordinator who connects parents to participating independently owned and operated licensed family child care homes in the community. The Network Coordinator screens the providers and works with them to support the quality of care children receive. Eligible student parents receive state or federal aid in paying for care.²⁴ Another example is the New York Office of Children and Family Services, which has a memorandum of understanding (MOU) with the State University of New York and City University of New York to subsidize child care services for low-income parents enrolled in either of these two higher education systems.²⁵

Build the Supply of Campus-Based and Campus-Linked Child Care and School-Age Care

Student parents who are also working may need non-traditional hour child care because they are enrolled in programs in the evenings or during the weekend, or because they are working evenings to accommodate day time classes. Lead Agencies can use a variety of strategies to work with higher education institutions to build the supply of on-campus and campus-linked child care for their student parents. The Act specifies that such strategies may include alternative payment rates to child care providers, the provision of direct contracts or grants to community-based organizations, offering child care certificates to parents, or other means.²⁶

Minnesota has a Postsecondary Child Care Grant Program for low-income college students in bachelor degree programs with children younger than age 12 who need child care.²⁷ Student parents apply to the financial aid office of their college or university. A full-time student may receive up to \$2,800 for each eligible child in an academic year, which may cover as much as 40 hours of child care per week per child. For infant care, the maximum amount may be increased by 10 percent to reflect higher market costs. Students who are receiving child care through the Minnesota Family Investment Program (the state's name for Temporary Assistance for Needy Families) are not eligible for this grant.

²³ U.S. Department of Labor, Breaking Down Barriers for Working Families blog, June 16, 2016. Retrieved from <https://blog.dol.gov/2016/06/16/breaking-down-barriers-for-working-families/>

²⁴ Rachel Schumacher. 2015. Prepping Colleges for Parents: Strategies for supporting student parent success in postsecondary education. Institute for Women's Policy Research.

²⁵ Fiscal Years 2016 – 2018 Child Care Development Fund State Plan for New York retrieved from [http://ocfs.ny.gov/main/childcare/stateplan/FFY%202016-2018%20Draft%20Child%20Care%20Development%20Fund%20\(CCDF\)%20Plan.pdf](http://ocfs.ny.gov/main/childcare/stateplan/FFY%202016-2018%20Draft%20Child%20Care%20Development%20Fund%20(CCDF)%20Plan.pdf)

²⁶ 42 U.S.C. §9858c(c)(2)(M).

²⁷ Minnesota Postsecondary Child Care Grant Program. Retrieved from <https://www.ohe.state.mn.us/mPg.cfm?pageID=140>

The federal Child Care Access Means Parents in School Program (CCAMPIS) is administered by the U.S. Department of Education and supports the participation of low-income parents in postsecondary education through the provision of campus-based child care services. An institution of higher education is eligible to receive a grant under this program if the total amount of all Federal Pell grant funds awarded to students enrolled at the institution of higher education for the preceding fiscal year equals or exceeds \$350,000. In FY 2014, there were 86 grantees around the country with an average grant of just under \$176,000. (<http://www2.ed.gov/programs/campisp/funding.html>) The program has not had significant change in funding levels for some time.

Ensure Student Parents are Aware of Child Care Options

Parents may enter job training and education programs without much information about their child care options and how to recognize quality care. Section 658E(c)(2)(D) and (E) of the Act includes several requirements for states and territories to provide parents with information about child care availability and quality, as well as general information about children’s development and other assistance programs, including through a state website.²⁸ Lead Agencies can ensure that education systems that serve low-income adults, including high school, GED, adult education, and postsecondary providers, are aware of and provide parents who want to enroll in their programs with access to the state’s child care consumer education website and materials.

For example, the Child Care Services Association (CCSSA), a statewide resource and referral service, works with the University of North Carolina at Chapel Hill to assist employee- and student-affiliated families understand and obtain early childhood education and school-age care programs. CCSSA also administers the University’s child care scholarship program (serving children younger than 12 years) by helping determine their eligibility for child care options, enrolling parents, and providing payments to the child care providers.

Related Guidance: This Information Memorandum provides guidance on helping low-income parents to further their education and training as a pathway to better wages and economic stability. ACF also released a Policy Statement on Early Childhood Career Pathways. The purpose of this Policy Statement is to support states and early childhood programs by providing recommendations for developing and implementing career pathways to support the professional learning, practice, and compensation of early childhood educators and program directors. The Policy Statement and this Information Memorandum complement each other and provide additional resources for program development at the state level. The Career Pathways Policy Statement can be found at: <http://www.acf.hhs.gov/ecc/early-childhood-career-pathways>.

Conclusion: Supporting parents’ participation in education and training, as well as quality child care for their children, promotes long-term success for CCDF families. A

²⁸ 42 U.S.C. § 9858c(c)(2)(D) and (E).

two-generation approach of supporting both parents and their children is linked with research findings and the goals of the recent child care reauthorization.

/s/

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RESOURCES

Balancing School, Work and Family: Low-Income Parents' Participation in Education and Training. Urban Institute. Washington, DC. 2014
www.urban.org/sites/default/files/alfresco/publication-pdfs/413253-Balancing-School-Work-and-Family-Low-Income-Parents-Participation-in-Education-and-Training.PDF

Building Pathways, Creating Roadblocks: State Child Care Assistance Policies for Parents in School, National Women's Law Center. Washington, DC. 2015 nwlc.org/wp-content/uploads/2015/08/state-child-care-assistance-policies-for-parents-in-school.pdf

College Students with Children are Common and Face Many Challenges in Completing College. Briefing Paper C404. Institute of Women's Policy Research. Washington, DC. 2013
[file:///C:/Users/Adele.Robinson/Downloads/C404-College%20Students%20with%20Children%20are%20Common%20and%20Face%20Challenges%20\(1\).pdf](file:///C:/Users/Adele.Robinson/Downloads/C404-College%20Students%20with%20Children%20are%20Common%20and%20Face%20Challenges%20(1).pdf)

Exploring the Intersection of Workforce Development and Child Care Gina Adams, Shayne Spaulding, and Caroline Heller. Urban Institute. Washington, DC. 2015
www.urban.org/sites/default/files/alfresco/publication-pdfs/2000225-Bridging-the-Gap.pdf

Improving Child Care Access to Promote Postsecondary Success Among Low-Income Parents Institute for Women's Policy Research, Washington, DC. (2011) Kevin Miller, Ph.D., Barbara Gault, Ph.D. (March 2011) www.iwpr.org/publications/pubs/improving-child-care-access-to-promote-postsecondary-success-among-low-income-parents

Income and Education as Predictors of Children's School Readiness. Julia B. Isaacs and Katherine Magnuson. Brookings Institution. Washington, DC. 2011
https://www.brookings.edu/wp-content/uploads/2016/06/1214_school_readiness_isaacs.pdf

Information Memorandum: Building the Supply of High-Quality Child Care. Administration for Children and Families, CCDF-ACF-IM-2015-02, U.S. Department of Health and Human

Services, Washington, DC. 2015

www.acf.hhs.gov/sites/default/files/occ/ccdf_acf_im_2015_02.pdf

Mother's Education and Children's Outcomes: How Dual-Generation Programs Offer Increased Opportunities for America's Families. Don Hernandez and Jeffrey Napierala, Foundation for

Child Development. New York, NY. 2014 <http://fcd-us.org/sites/default/files/Mothers%20Education%20and%20Childrens%20Outcomes%20FINAL.pdf>

Partnering to Meet the Child Care Needs of Parents in Education and Training: Four Profiles of Collaboration. Teresa Derrick-Mills, Caroline Heller, and Gina Adams. Urban Institute.

Washington, DC. 2016 www.urban.org/sites/default/files/alfresco/publication-pdfs/2000750-Partnering-to-Meet-the-Child-Care-Needs-of-Parents-in-Education-and-Training-Four-Profiles-of-Collaboration.pdf

Prepping Colleges for Parents: Strategies for Supporting Student Parent Success in Postsecondary Education. Rachel Schumacher. Institute for Women's Policy Research. 2015

www.iwpr.org/publications/pubs/prepping-colleges-for-parents-strategies-for-supporting-student-parent-success-in-postsecondary-education

U.S. Department of Education, National Center for Education Statistics, IPEDS. Fall 2012, Institutional Characteristics component (final data). <http://nces.ed.gov/ipeds/>

Women in Community Colleges: Access to Success. American Association of University

Women. Washington, DC. 2013 <http://www.aauw.org/research/women-in-community-colleges/>