



CHILDREN LEARNING, PARENTS EARNING, COMMUNITIES GROWING 1451 River Park Drive, Suite 185, Sacramento, CA 95815 Phone: (916) 567-6797

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SENT VIA ELECTRONIC EMAIL TO: statepln@cde.ca.gov

State Plan Public Hearing Coordinator
Early Education and Support Division
California Department of Education (CDE)
1430 N Street, Suite 3410
Sacramento, CA 95814

Dear State Plan Public Hearing Coordinator:

On behalf of the California Alternative Payment Program Association (CAPPA), I would like to respectfully submit our input for consideration as it relates to the **CHILD CARE AND DEVELOPMENT FUND STATE PLAN FOR California; FFY 2019-2021 (State Plan)**. When considering our input, CAPPA would encourage the department to take a broader view of California's child care and early education system; and to develop language that embraces the recent shifts in culture, mainly moving away from regulation and compliance of parents to providing a strong continuum of care for children. With the recent enactment of not less than 12-month eligibility and the increase in the exit threshold of the State Median Income (SMI), CAPPA suggests expanding on this stabilization of families, by framing the State Plan focus on both the needs of children AND families versus children OR families.

Before we get into the specifics of the State Plan, CAPPA agencies have requested that it be underscored to the California Department of Education (CDE) the necessity of the role that Alternative Payment Program (APP) agencies have in directly supporting the needs of subsidized families and their children. The APP community structure is the only delivery system that provides income eligible subsidized families with comprehensive case management and coordination of services. Further, many families that access the child care system, come directly into the APP. It is important that this core fact be reflected in the updated State Plan. It further must be underscored that it is only the APP agencies that interface and know our license-exempt providers.

For purposes of this communication and to comply with the deadlines set forth by CDE to respond to the draft State Plan, CAPPA has grouped input together in page order so that it seamlessly follows the layout of the draft. Specific Child Care and Development Fund (CCDF) references are bolded in this letter.

Page 5, 1.2.2. How is the CCDF program operated? In other words, which entity(ies) implement or perform these CCDF services? Check all that apply.

CAPPA input: a) Who conducts eligibility determinations? Consistent with the comments made above, CAPPA respectfully requests that a check box be added noting "Alternative Payment Programs". Core to the function of an APP is determining eligibility of parents/families for access to child care.

CAPPA input: b) Who assists parents in locating child care (consumer education)? Many families come directly to an alternative payment program for support in locating child care or with a licensed-exempt provider. Families being served within an alternative payment program meet with their case managers routinely as the conduit for information.



CAPPA input: c) Who issues payments?: Add alternative payment programs as a standalone option to check as core to the function in the issuance of vouchers and payments.

Page 8, 1.4.1 This section notes required interests that the CDE must coordinate in order to “coordinate with over the next 3 years to expand accessibility and continuity of care and to assist children enrolled in early childhood”

CAPPA input: Include (REQUIRED) coordination with alternative payment programs that directly support income eligible families. Data shows that families supported by an APP oftentimes stay with that agency from 2.3 to 4.8 years. These agencies may be the only source of information to the income eligible families.

Page 13, 1.7 Coordination With Local or Regional Child Care Resource and Referral Systems.

CAPPA input: Include alternative payment programs. In California, there are 76 alternative payment programs but fewer resource and referral agencies. Not all resource and referral agencies are connected to an alternative payment program. In order to ensure all families are supported, both entities must be included. It is the alternative payment programs that support families in the subsidy system with ongoing information. Further, it is only the APPs that have information on license-exempt providers.

It is important for the CDE to understand that no other entity has information on license-exempt providers but the APP agencies.

Page 15, 2 Promote Family Engagement Through Outreach and Consumer Education

CAPPA input: Alternative payment programs must be considered a core entity to engage and provide consumer information to subsidized families. Again, it is the APPs that are with the most fragile of families and have established a trust and history with each parent/family. To truly maximize and impact these families, the APPs must be included.

The above input is recommended for consideration under 2.1, 2.11, 2.2, as previously noted. Again, APPs may be the only source of consistent information and reliable communication with a family already in the subsidized system. APPs support families with case management supports that best meet individual linguistic and cultural needs.

Page 23, 3.1.1. Eligibility criteria based on a child’s age

CAPPA input a): Alternative Payment Programs have been given direction from the California Department of Education that due to 12-month eligibility, children whose 13th birthday falls in the middle of a certification or recertification period will continue to be served. For this reason, CAPPA urges the California Department of Education to articulate and advocate for that within the CCDF state plan to promote continuity of care and avoid disruption of services.

Page 30, 3.3.1 12-Month eligibility.

The Lead Agency is required to establish a minimum 12-month eligibility and redetermination period, regardless of changes in income (as long as the income does not exceed the federal threshold of 85 percent of the state median income) or temporary changes in participation in work, training, or educational activities (658E(c)(2)(N)(i) and (ii)).

This change means that a Lead Agency may not terminate CCDF assistance during the 12-month period if a family has an increase in income that exceeds the state’s income eligibility threshold, but not the federal threshold of 85 percent of SMI. The Lead Agency may not terminate assistance prior to the end of the 12-month period if a family experiences a temporary job loss or a temporary change in participation in a training or educational activity. A temporary change in eligible activity includes, at a minimum, any time-limited absence from work for an employed parent due to such reasons as the need to care for a family member or an illness; any interruption in work for a seasonal worker who is not working; any student holiday or break for a parent participating in a training or educational program; any reduction in work, training, or education hours, as long as the parent is still working or attending a training or educational program; any other cessation of work or attendance at a training or educational program that does not exceed 3 months or a longer period of time established by the Lead Agency; any changes in age, including turning 13 years old during the 12-month eligibility period; and any changes in residency within the state, territory, or tribal service area.

CAPPA input b) How does the Lead Agency define “temporary change?” In alignment with the 2017-18 Budget Act which amended the language of Education Code (EDC) 8263¹, CAPPA recommends aligning CCDF input with the language of EDC8263, which states that “a family shall be considered to meet all eligibility and need requirements for those services for not less than 12 months, shall receive those services for not less than 12 months before having their eligibility or need recertified, and shall not be required to report changes to income or other changes for at least 12 months”. Further, EDC 8263 clarifies that families’ only reporting responsibility is to report changes in income that exceed the threshold for ongoing eligibility. CAPPA recommends that this language is incorporated into our state plan to ensure that the true nature of 12-month eligibility is realized in its entirety.

Page 33, 3.3.3 Changes reporting during the 12-month eligibility period.

CAPPA input c) How does the Lead Agency allow for families to report changes to ensure that reporting requirements are not burdensome and to avoid an impact on continued eligibility between redeterminations? Check all that apply.:

CAPPA strongly believes that it is imperative that families are given a number of options in reporting voluntary changes in order to avoid unnecessary burden on the families and interruption in services. CAPPA strongly recommends that the state utilize all forms of communication, including verbal, electronic and written.

Page 39, 4.2 Assessing Market Rates and Child Care Costs.

CAPPA input: In regards to the above, CAPPA asks that the California Department of Education take on the task of considering options other than the Regional Market Rate Survey (RMR) as the methodology for payment to providers. This system can be cumbersome and complex. In addition, minimum wage continues to rise, and while we applaud this, we also believe that we need to do whatever we can to ensure that our childcare providers are being paid living wages for the work that they do. We recommend that CDE consider looking at a rate simplification and consider alternatives to our current RMR system.

Page 61, 5.3.4 The Lead Agency must have policies and practices that require licensing inspectors (or qualified monitors designated by the Lead Agency) to perform an annual monitoring visit of each license- exempt CCDF provider

¹ http://leginfo.legislature.ca.gov/faces/codes_displaySection.xhtml?sectionNum=8263.&lawCode=EDC

for compliance with health, safety, and fire standards (658E(c)(2)(K)(i)(IV); 98.42(b)(2)(ii)). The state/territory may determine if exempt relative providers (as described in section (658P(6)(B)) do not need to meet this requirement. At a minimum, the health and safety requirements to be inspected must address the standards listed in 5.1.4 (98.41(a)).

CAPPA Input : In general, we strongly believe that components of the State Plan related to visiting and communicating with license exempt providers, is best handled by APPs. APPs are the only entities that know who the license-exempt providers are, already have an established relationship with license-exempt providers and are the only entity that maintains a comprehensive list of all license-exempt providers in the state. It is the APPs that are tasked with verifying required documents, authorizing license-exempt providers and for issuing payments. For this reason, we ask CDE to factor in APPs as integral to the visiting of these providers.

Thank you for your attention to the issues raised in this letter.

Warm regards.



Denyne Micheletti Colburn, CEO
CAPPA