



State Child Care Assistance Policies for Parents in Education and Training

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Workforce development activities such as education and training help low-income parents gain skills and experience to obtain employment or further advance their career opportunities. Education and training activities help prepare parents for work, but a lack of access to child care can be a barrier for parents seeking to participate in these activities. The Child Care and Development Fund (CCDF), the largest program providing child care assistance to low-income families, has the potential to help parents in education and training access child care, but the eligibility requirements vary across states. The purpose of this brief is to analyze current state eligibility policies, assess the extent to which they support access to child care for parents in pursuit of education and training, and look at changes to such policies in the past five years.

Overview of Findings

The Child Care and Development Fund (CCDF) is a block grant program that provides states with funds to use for child care assistance to low-income families. Through the block grant, the federal government outlines broad program requirements, and within these broad requirements, states set many of the detailed rules—including eligibility rules—used to administer their programs. Here we focus on the eligibility rules states have established for parents in education and training activities.

We examine the following CCDF eligibility policies for adult parents (not receiving TANF) in workforce development activities:

- Postsecondary education and training
- High school or GED programs
- English literacy activities
- Adult basic education

Almost every state allows for at least some workforce development activities when determining CCDF eligibility (table 1). The most common workforce development activity that states approved for eligibility was postsecondary education and training. However, the majority of states have additional requirements for eligibility. (Adult basic education is not included in the table below due to data limitations discussed later in this brief.)

TABLE 1
Number of States with Additional CCDF Eligibility Requirements for Parents in Education and Training Activities, 2017

Requirements for adult (non-teen) parents not receiving TANF

	Postsecondary education or training	High school or GED	English literacy	Total number of states
States allowing eligibility	49	45	33	50
States with additional requirements (among states allowing eligibility)	30	15	12	33
Degree limit	18	NA	NA	18
Vocational requirements	7	NA	NA	7
Work requirements	10	8	6	11
Time limits	7	3	2	9
Performance requirements	4	1	1	4
Qualifying institutions	5	2	2	5
Other	12	3	2	12

Source: Authors' tabulations of data from the CCDF Policies Database.

Notes: For the purposes of this table, Washington, DC is counted as a state. NA = not applicable. Columns and rows do not add to the totals because states may be represented in more than one cell.

Since 2012, several states have made changes to their eligibility policies for parents in workforce development activities, with most of these changes expanding eligibility for parents in postsecondary education and training activities. The sections below provide additional details about current state requirements and the changes that have occurred over the past five years.

About This Brief

In 2014, Urban Institute researchers reviewed states' 2012 CCDF policies related to education and training to understand how states were serving parents in these activities and what gaps existed in meeting these parents' needs (Adams et al. 2014).¹ One element of that review was to examine how

states treated education and training activities in their eligibility requirements for CCDF, as these policies are set at the state level. The purpose of this brief is to update the prior analysis to provide a snapshot of these policies today and how they have changed since the last analysis, and to inform a related framework for assessing state policies and practices that support access to child care for parents in education and training. There is a companion brief that examines the proportion of families served by CCDF in each state who are getting assistance to support education and training (Gebrekristos and Adams 2019). All of these resources are part of a larger Urban Institute project, “Bridging the Gap: Examining Child Care’s Intersection with Postsecondary Education and Workforce Development,” which includes a dozen other reports on related aspects of this issue.²

This brief focuses on the CCDF policies in effect on October 1, 2017, the most recent date for which data are currently available. If states have made more recent changes to their policies, those are not reflected here as more recent policy data are not yet available. The policies presented here are for adult (non-teen) parents who are not TANF recipients. Teen parents and TANF recipients often have different, and less restrictive, eligibility rules for qualifying for child care subsidies through CCDF and related programs.³

Understanding the eligibility rules examined in this brief is an important first step in determining whether families seeking education and training can receive child care assistance through the CCDF program in their states. However, being eligible does not mean that families will get services, as CCDF funds are limited, and as a result, not all eligible families are served.⁴ Therefore, among eligible families, states must often prioritize which families receive assistance with the funds that are available.

In the sections that follow, we use data from the most recent *CCDF Policies Database Book of Tables* along with public data from the full database to assess state policies for parents in the four different types of education and training activities (Tran et al. 2018).⁵ The CCDF Policies Database is a project developed and maintained by the Urban Institute with funding from the US Department of Health and Human Services, Administration for Children and Families, Office of Planning, Research, and Evaluation. The database tracks each state’s CCDF policies over time, with hundreds of variables that capture states’ detailed policies regarding family eligibility requirements, family payments, provider payments, and selected provider policies. Data in the annual reports are reviewed and verified by staff in each state. We note when data presented here are from the full database and not reviewed as part of the annual report process.

Eligibility Policies for Parents in Postsecondary Education and Training

The first category we examine is state eligibility policies concerning parents in postsecondary education and training. There is a strong relationship between employment outcomes and educational attainment, with high levels of education associated with higher levels of employment and earnings (Vilorio 2016). While education activities can differ from training activities, the distinction between these activities is not always clear in state policies, so they are combined in this brief. Looking at this combined category,

the 2017 data show that almost all states allowed for postsecondary education and training activities in at least some cases for adult parents not receiving TANF.

- Thirty-eight states and the District of Columbia allowed parents to qualify for subsidies based on education and/or training alone. Among these, Rhode Island approved care for training activities but did not cover any postsecondary education activities for parents.
- An additional 10 states allowed parents to qualify for child care subsidies for the time parents participated in postsecondary education and training but required parents to be employed for a minimum number of hours in addition to their training or education hours to qualify for assistance.⁶

Among the 48 states and the District of Columbia that approved postsecondary education or training activities in at least some circumstances for adult parents not receiving TANF, 30 placed additional stipulations on the qualifying activities (see figure 1 and appendix table A1).

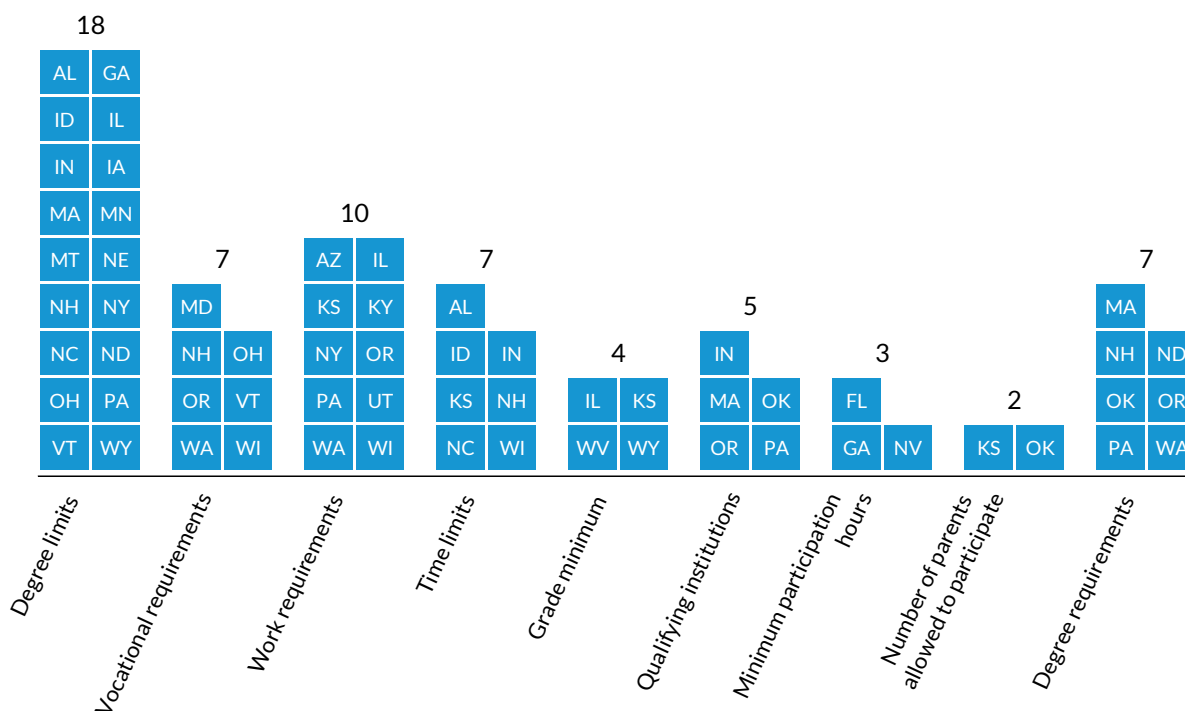
- **Degree limits.** The most common restriction for CCDF eligibility for postsecondary education and training limited the number or type of degrees or certifications that parents could seek. States took different approaches to these limits:
 - » *Limit to a bachelor's degree.* Fifteen states (Alabama, Idaho, Illinois, Indiana, Iowa, Massachusetts, Montana, Nebraska, New Hampshire, New York, North Carolina, North Dakota, Pennsylvania, Vermont, and Wyoming) explicitly stated they did not allow postsecondary education above a bachelor's degree. Some other states (Minnesota and Ohio) only allowed postsecondary education beyond a bachelor's degree under certain circumstances, such as if it was necessary to maintain employment, certification, or licensure or if the parent was a part of the state's employment plan. In addition to these states, New Hampshire required that postsecondary education not result in a degree at the bachelor's level or higher.
 - » *Number of degrees and previous postsecondary experience.* Eight states (Illinois, Indiana, Minnesota, Montana, Nebraska, North Dakota, Ohio, and Wyoming) limited the number of degrees or previous credit hours a participant in postsecondary education could have received prior to applying for child care subsidies.
 - » *No degree program allowed.* Georgia did not allow postsecondary education to include a degree program but did allow participation in vocational programs at colleges and universities.
- **Vocational requirements.** Seven states (Maryland, New Hampshire, Ohio, Oregon, Vermont, Washington, and Wisconsin) required that postsecondary education or training support parents in maintaining or obtaining employment.
- **Work requirements.** As noted above, ten states (Arizona, Illinois, Kansas, Kentucky, New York, Oregon, Pennsylvania, Utah, Washington, and Wisconsin) set a minimum weekly work requirement for parents in postsecondary education to be eligible for CCDF funds. Illinois required parents to work after participating in a training program for a certain number of

months. Additionally, while not included in the count of 10 states because full-time students were not required to work, Montana imposed work requirements on part-time students but noted that the requirements could be waived if they were a barrier to finishing school.

- **Time limits.** Seven states (Alabama, Idaho, Indiana, Kansas, New Hampshire, North Carolina, and Wisconsin) enforced time limits on postsecondary education or training. The time limits in these states ranged from 20 to 48 months.
- **Grade minimum.** Four states (Illinois, Kansas, West Virginia, and Wyoming) required that students maintain a minimum grade point average (GPA) while in postsecondary education or training. The GPA requirements typically ranged from a 2.0 to 2.5, depending on whether the student was in education, in training, or working.
- **Qualifying institutions.** Four states (Indiana, Massachusetts, Oregon, and Pennsylvania) limited CCDF eligibility for parents in postsecondary education by whether they attended certified or accredited institutions. Oklahoma required that training programs qualify for federal financial aid from the US Department of Education.
- **Minimum participation hours.** Three states (Florida, Georgia, and Nevada) required parents to participate in training activities for a minimum number of hours each week, ranging from 20 to 24 hours per week. In Florida and Georgia, parents could combine education and work activities to meet the minimum-hour requirement.
- **Number of parents allowed to participate.** Two states (Kansas and Oklahoma) limited child care assistance for postsecondary education and training to only one parent in the household. Both states required that one parent work during the hours the other parent was in training.
- **Degree requirements.** Seven states (Massachusetts, New Hampshire, North Dakota, Oklahoma, Oregon, and Pennsylvania, and Washington) required that postsecondary education lead to either a certificate or degree.

FIGURE 1

States with Additional CCDF Eligibility Requirements for Parents in Postsecondary Education and Training Activities, 2017



Source: Authors' tabulations of data from the CCDF Policies Database.

Notes: For the purposes of this table, Washington, DC is counted as a state. Number labels represent the number of states.

When we compare the 2017 policies with the 2012 policies reviewed for the prior analysis, we find that nine states made changes to their policies in this area, with all nine states expanding eligibility for families with parents in postsecondary education and training activities. For example, over the past five years, Nevada began allowing postsecondary education and training activities as approved activities, and Rhode Island began covering training activities for adults rather than limiting these activities to teen parents. Other examples of changes during this time period include expanding the activities that count toward training (North Dakota), removing GPA requirements (Arizona and Missouri) or reducing penalties for not meeting those requirements (West Virginia), removing the time limits for these activities or increasing the number of months allowed under the time limits (Georgia and Idaho), and lowering the minimum work-hour requirements (Kansas).

Eligibility Policies for Parents in High School Diploma or Equivalency Programs

As noted above, there is a strong relationship between employment and earnings outcomes and educational attainment. The lack of a high school credential generally means earning less, but it can also

create a barrier to accessing other education and training programs. Programs that help people earn a high school credential can be important for overcoming this barrier. In 2017, most states allowed adult parents not receiving TANF to be eligible for CCDF child care subsidies to finish high school or earn an equivalent certification.

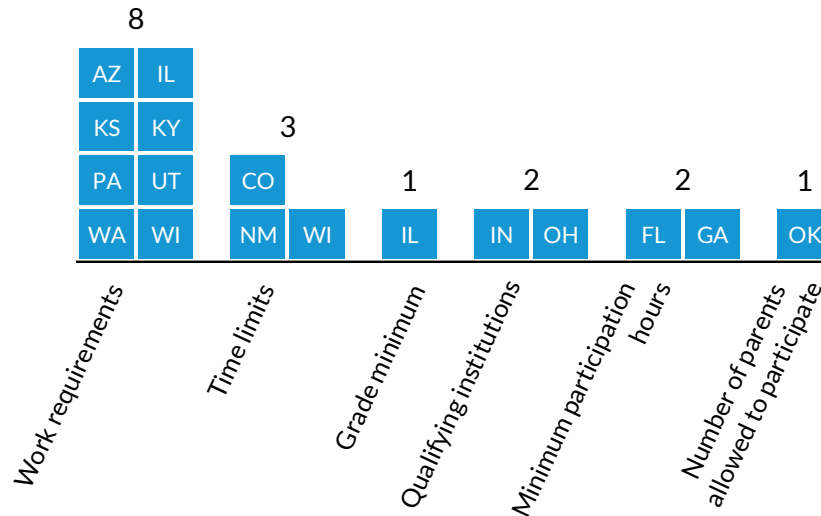
- Thirty-two states and the District of Columbia allowed parents in high school and General Educational Development (GED) activities to be eligible for CCDF subsidies based solely on participation in those activities.
- An additional eight states approved high school or GED activities only when the parents also met minimum work-hour requirements.
- Four states approved high school activities for all parents but restricted GED activities in some cases, such as in New Jersey where GED activities were only approved for TANF recipients.

Among the 44 states and the District of Columbia that approved high school or equivalency programs in at least some circumstances for adult parents not receiving TANF, 15 placed additional stipulations on the qualifying activities (see figure 2 and appendix table A2).

- **Work requirements.** Eight states (Arizona, Illinois, Kansas, Kentucky, Pennsylvania, Utah, Washington, and Wisconsin) had some form of work requirements for parents in a high school or GED program to be eligible for child care assistance. In Illinois, GED activities were approved with no work requirement for the first 24 nonconsecutive months, but after 24 months, the parent was required to work 20 hours per week.
- **Time limits.** Three states (Colorado, New Mexico, and Wisconsin) placed restrictions on how long a parent could receive subsidies for high school or GED activities. These restrictions ranged from 12 to 24 months. The time limits did not apply to teen parents in Colorado and Wisconsin.
- **Grade minimum.** Illinois required that students maintain a C average or, in cases where grades were not used, meet comparable requirements of the education or training program.
- **Qualifying institutions.** Two states (Indiana and Ohio) restricted eligibility to parents enrolled in certain types of programs. Indiana required parents to enroll in a certified or accredited secondary education institution. Ohio required classes to be taken in person with an instructor present.
- **Minimum participation hours.** Two states (Florida and Georgia) required parents to participate in high school or GED activities a minimum number of hours each week. Florida required participation for 20 hours per week, and Georgia required adult parents to participate in GED activities for 24 hours each week. In both states, parents could combine education and work activities to meet the minimum-hour requirement.
- **Number of parents allowed to participate.** Oklahoma allowed only one parent at a time to participate in GED activities.

FIGURE 2

States with Additional CCDF Eligibility Requirements for Parents in High School Diploma or Equivalency Programs, 2017



Source: Authors' tabulations of data from the CCDF Policies Database.

Notes: For the purposes of this table, Washington, DC is counted as a state. Number labels represent the number of states.

Very few states made changes to their eligibility policies for parents in high school or equivalency programs since 2012. Most notably, Georgia and Missouri removed time limits on these activities, and Ohio added the requirement that these activities must require classroom attendance with an instructor present.

Eligibility Policies for Parents in English Literacy Programs

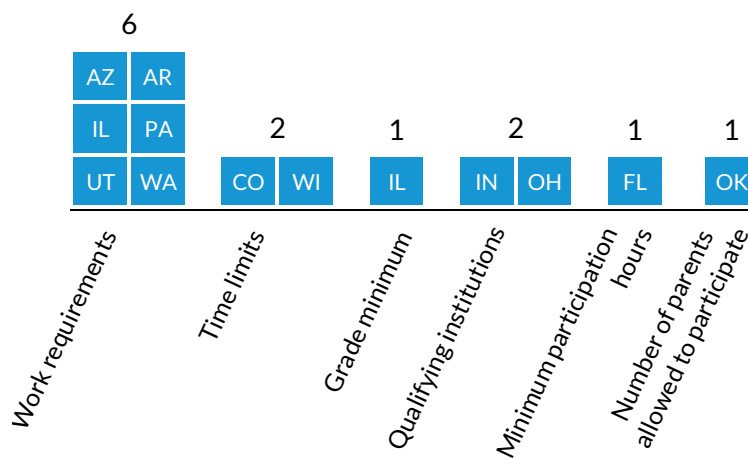
A key barrier to advancement for low-income individuals can be lacking English language proficiency (Bernstein and Vilter 2018). In 2017, 32 states and the District of Columbia approved English literacy as an activity that would allow adult parents not receiving TANF to be eligible for subsidies in at least some cases. (CCDF regulations base eligibility on the immigration status of the child, so parents whose children are citizens or legal immigrants can qualify for subsidies.)

- In 26 states and the District of Columbia, parents could qualify for child care assistance based solely on participation in English literacy activities.
- An additional six states required participants to also meet minimum work requirements to have their English literacy activities approved for eligibility.

Among the 32 states and the District of Columbia that approved English literacy activities in at least some circumstances for adult parents not receiving TANF, 12 placed additional stipulations on the qualifying activities (see figure 3 and appendix table A3).

- **Work requirements.** As described above, six states (Arizona, Arkansas, Illinois, Pennsylvania, Utah, and Washington) had work requirements for parents participating in English literacy activities. Adult parents were required to work because of their length of participation in the program (after 24 months in Illinois) or because the parent had to qualify based on employment, rather than education or training. The number of work hours required per week ranged from 10 to 20 hours. In Arkansas, parents could request a waiver to qualify for child care for English literacy activities without meeting work or other activity requirements.
- **Time limits.** Two states (Colorado and Wisconsin) limited eligibility for child care subsidies based on participation in English literacy programs to 12 and 24 months, respectively.
- **Grade minimum.** Illinois required students to maintain a C average or comparable performance for programs that did not use grades.
- **Qualifying institutions.** Two states (Indiana and Ohio) restricted eligibility to parents enrolled in certain types of programs. Indiana required parents to enroll in a certified or accredited secondary education institution, and Ohio required classes to be taken in person with an instructor present.
- **Minimum participation hours.** Florida required that parents participate in education activities at least 20 hours a week.
- **Number of parents allowed to participate.** Oklahoma limited eligibility for child care subsidies based on participation in English literacy programs to one parent in two-parent families.

FIGURE 3
States with Additional CCDF Eligibility Requirements for Parents in English Literacy Programs, 2017



Source: Authors' tabulations of data from the CCDF Policies Database.

Notes: For the purposes of this table, Washington, DC is counted as a state. Number labels represent the number of states.

When we compare the 2017 policies with the 2012 policies reviewed for the prior analysis, we see that very few states have made changes to these policies over the past five years. Most notably, Louisiana and Maryland added English literacy programs as eligible activities for subsidies, and Arkansas added its policy to allow parents to apply for waivers to the minimum work-hour requirement.

Eligibility Policies for Parents in Adult Basic Education

A broader category of activity that can be important for low-skilled, low-income parents is adult basic education, which can include high school equivalency and English language literacy, but also other basic skills such as basic numeracy and literacy. Adult basic education is captured in the CCDF Policies Database but not in the annual reports produced as part of that project. As with the data from the *Book of Tables*, the data are based on the state policy manuals, but unlike the data from the *Book of Tables* reported above, the information for this category of policies has not been verified by the states.

- In 2017, 25 states and the District of Columbia did not discuss if adult basic education is approved for CCDF eligibility in their manuals. In these cases, the states might have policies allowing for these activities, but that information is not available in the documents that are collected and reviewed for the CCDF Policies Database.
- Out of the 25 states that included policies for adult basic education in their manuals, 22 states approved adult basic education in at least some cases.
 - » Fifteen states approved adult basic education for all parents.
 - » An additional seven states placed some restrictions on these activities, including imposing time limits (Colorado, Missouri, and Wisconsin), setting program standards (Missouri and Ohio), and imposing minimum work-hour requirements in order to have adult basic education activities approved for eligibility (Utah and Wisconsin for all parents, Illinois for all parents after 24 months, and Washington for adult parents).

Because so many states do not address adult basic education activities in their CCDF policy manuals, it is difficult to assess how these policies have changed over the past several years. Among the states that do address this policy in their manuals, only one made changes, with Ohio adding the requirement that activities take place in a classroom with an instructor present.

Summary and Conclusions

The CCDF program provides an opportunity to support low-income parents in education and training programs as they overcome barriers to successfully accessing and completing workforce development activities, including the challenge of accessing child care.

As noted above and shown earlier in table 1, almost every state approves training and education workforce development activities for adult parents not receiving TANF. Across the different workforce

development activities, postsecondary education and training was the most likely to qualify as an eligible activity for CCDF (in 48 states and DC), although more than half of the states included additional requirements for parents. High school and GED activities were also likely to count as eligible activities for CCDF (approved in 44 states and DC), with one-third of the states including additional requirements for these activities. Finally, about two-thirds of states (32 states and DC) allowed parents needing English literacy to qualify for CCDF subsidies, with a third of the states including additional requirements for parents. Across the different types of education and training activities, the most common restrictions were degree limits and minimum work-hour requirements. The latter might prove most challenging as parents are then required to juggle both education and training activities with employment and other family responsibilities.

Since 2012, several states have made changes to their policies, with most changes expanding eligibility for parents in postsecondary education and training activities, either by newly covering these activities or removing or easing some of the restrictions on the activities. These are positive steps toward improving labor market outcomes for low-income parents.

As states consider how best to support parents in education and training, the policies they establish for their CCDF programs will be important as access to affordable and consistent child care is crucial for parents' successful participation in these activities. In turn, such policies have the potential to increase economic opportunity and mobility for parents and their families.

Appendix

The appendix tables presented here provide a summary of state CCDF policies for parents in the following workforce development activities:

- Postsecondary education and training (table A1)
- High school or GED activities (table A2)
- English literacy activities (table A3)

The tables provide a snapshot of the policies across states. For more detailed policy information, please refer to the earlier sections of this brief.

TABLE A1

State CCDF Policies for Parents in Postsecondary Education and Training, 2017

Policies for adult (non-teen) parents not receiving TANF

State	Allows eligibility	Additional requirements, among states allowing eligibility for parents in postsecondary education and training						
		Degree limit	Vocational requirements	Work requirements	Time limits	Performance requirements	Qualifying institutions	Other requirements
Alabama	X	X			X			
Alaska	X							
Arizona	X			X				
Arkansas	X							
California	X							
Colorado	X							
Connecticut								
Delaware								
District of Columbia	X							
Florida	X							X
Georgia	X	X						X
Hawaii	X							
Idaho	X	X			X			
Illinois	X	X		X		X		
Indiana	X	X			X		X	
Iowa	X	X						
Kansas	X			X	X	X		X
Kentucky	X			X				
Louisiana	X							
Maine	X							
Maryland	X		X					
Massachusetts	X	X					X	X
Michigan	X							
Minnesota	X	X						
Mississippi	X							
Missouri	X							
Montana	X	X						X
Nebraska	X	X						
Nevada	X							X
New Hampshire	X	X	X		X			X
New Jersey	X							
New Mexico	X							
New York	X	X		X				
North Carolina	X	X			X			
North Dakota	X	X						X
Ohio	X	X	X					
Oklahoma	X						X	X
Oregon	X		X	X			X	X
Pennsylvania	X	X		X			X	X
Rhode Island	X							
South Carolina	X							
South Dakota	X							
Tennessee	X							

State	Allows eligibility	Additional requirements, among states allowing eligibility for parents in postsecondary education and training						
		Degree limit	Vocational requirements	Work requirements	Time limits	Performance requirements	Qualifying institutions	Other requirements
Texas	X							
Utah	X			X				
Vermont	X	X	X					
Virginia	X							
Washington	X		X	X				X
West Virginia	X					X		
Wisconsin	X		X	X	X			
Wyoming	X	X				X		
Total	49	18	7	10	7	4	5	12

Source: Authors' tabulations of data from the CCDF Policies Database.

TABLE A2

State CCDF Policies for Parents in High School or GED Activities, 2017

Policies for adult (non-teen) parents not receiving TANF

State	Allows eligibility	Additional requirements, among states allowing eligibility for parents in high school or GED activities				
		Degree limit	Time limits	Performance requirements	Qualifying institutions	Other requirements
Alabama	X					
Alaska	X					
Arizona	X	X				
Arkansas	X					
California	X					
Colorado	X		X			
Connecticut						
Delaware	X					
District of Columbia	X					
Florida	X					X
Georgia	X					X
Hawaii	X					
Idaho	X					
Illinois	X	X		X		
Indiana	X				X	
Iowa	X					
Kansas	X	X				
Kentucky	X	X				
Louisiana	X					
Maine	X					
Maryland	X					
Massachusetts	X					
Michigan	X					
Minnesota	X					
Mississippi	X					
Missouri	X					
Montana						

State	Allows eligibility	Additional requirements, among states allowing eligibility for parents in high school or GED activities				
		Degree limit	Time limits	Performance requirements	Qualifying institutions	Other requirements
Nebraska	X					
Nevada						
New Hampshire	X					
New Jersey	X					
New Mexico	X		X			
New York						
North Carolina	X					
North Dakota	X					
Ohio	X				X	
Oklahoma	X					X
Oregon						
Pennsylvania	X	X				
Rhode Island						
South Carolina	X					
South Dakota	X					
Tennessee	X					
Texas	X					
Utah	X	X				
Vermont	X					
Virginia	X					
Washington	X	X				
West Virginia	X					
Wisconsin	X	X	X			
Wyoming	X					
Total	45	8	3	1	2	3

Source: Authors' tabulations of data from the CCDF Policies Database.

TABLE A3

State CCDF Policies for Parents in English Literacy Activities, 2017

Policies for adult (non-teen) parents not receiving TANF

State	Allows eligibility	Additional requirements, among states allowing eligibility for parents in English literacy activities				
		Degree limit	Time limits	Performance requirements	Qualifying institutions	Other requirements
Alabama						
Alaska	X					
Arizona	X	X				
Arkansas	X	X				
California	X					
Colorado	X		X			
Connecticut						
Delaware						
District of Columbia	X					
Florida	X					X
Georgia						
Hawaii						
Idaho	X					

State	Allows eligibility	Additional requirements, among states allowing eligibility for parents in English literacy activities				
		Degree limit	Time limits	Performance requirements	Qualifying institutions	Other requirements
Illinois	X	X		X		
Indiana	X				X	
Iowa	X					
Kansas						
Kentucky						
Louisiana	X					
Maine						
Maryland	X					
Massachusetts	X					
Michigan	X					
Minnesota	X					
Mississippi						
Missouri	X					
Montana						
Nebraska	X					
Nevada						
New Hampshire	X					
New Jersey	X					
New Mexico	X					
New York	X					
North Carolina						
North Dakota	X					
Ohio	X				X	
Oklahoma	X					X
Oregon						
Pennsylvania	X	X				
Rhode Island						
South Carolina						
South Dakota						
Tennessee						
Texas	X					
Utah	X	X				
Vermont	X					
Virginia	X					
Washington	X	X				
West Virginia	X					
Wisconsin	X		X			
Wyoming						
Total	33	6	2	1	2	2

Source: Authors' tabulations of data from the CCDF Policies Database.

Notes

- ¹ For a more detailed discussion of the issues that are the focus of this brief, please consult the more expansive 2014 report (Adams et al. 2014).
- ² For more information about the project, see <https://www.urban.org/bridging-gap>.
- ³ For information on CCDF policies for teen parents and parents receiving TANF, see the CCDF Policies Database: <https://ccdf.urban.org>.
- ⁴ Nina Chien, “Factsheet: Estimates of Child Care Eligibility & Receipt for Fiscal Year 2015,” Office of the Assistant Secretary for Planning and Evaluation, US Department of Health and Human Services, January 2019, <https://aspe.hhs.gov/system/files/pdf/260361/CY2015ChildCareSubsidyEligibility.pdf>.
- ⁵ The CCDF Policies Database is available for public use and can be accessed via the website <https://ccdf.urban.org>.
- ⁶ For more information on the implications of work requirements for parents in education and training, please consult the more expansive 2014 report (Adams et al. 2014).

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