



The Child Care Development Fund and Workforce Development for Low-Income Parents

Opportunities and Challenges with Reauthorization

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Low-income, low-skilled parents can face particular challenges in getting the education and training they need to improve their employment and career path opportunities so they can better support their families. Key among these challenges is the difficulty they can face in finding and affording child care. Such families may be eligible for child care assistance from the nation's primary child care assistance program, the federal Child Care and Development Fund (CCDF; also known as the Child Care and Development Block Grant). However, program data and interviews with practitioners and policymakers across the country suggest that parents seeking education and training are less likely to get child care assistance than those needing it to support employment.

This situation appears to be due to multiple factors, including that the CCDF is not funded at sufficient levels to serve all eligible families. States must make trade-offs in choosing which low-income families will get assistance, and parents participating in education and training have often not been considered a high priority. As a result, child care assistance is not consistently available to help low-income parents improve their skills to support improved employment opportunities and career pathways that, in turn, would lead to higher-paying jobs that would support the healthy development of their children (Adams, Spaulding, and Heller 2015; Adams et al. 2014). This reality undercuts the goals of both the workforce development system and the child care system, which focus on supporting low-income individuals' ability to get and retain good-paying jobs.

However, in recent years, these families' needs are becoming more visible. Policymakers from diverse ends of the political spectrum have started to identify the child care challenges faced by parents (particularly single parents) seeking to improve their employment opportunities through education and

training.¹ The child care challenges these parents face are also reflected in the growing interest in two-generation strategies, which work to simultaneously meet parents' needs for education and training and their children's need for high-quality early education (Annie E. Casey Foundation 2014; Mosle and Patel 2012).

In addition to this growing awareness, the CCDF was recently reauthorized for the first time in 18 years, which means that states across the country must reexamine their child care policies and services to conform to the requirements of the new legislation. Although it is still a block grant with significant state flexibility and discretion, the reauthorized CCDF establishes new requirements and priorities for states to implement in the coming years. Further, the primary federal workforce program that governs many state and local workforce policies was also recently reauthorized with the Workforce Innovation and Opportunity Act of 2014 (WIOA), with a greater focus on meeting the needs of individuals with barriers to employment (Spaulding 2015). As a result of these developments, the child care and workforce development systems are both currently in a state of transition as stakeholders redesign them to meet these new demands.

The state of flux precipitated by WIOA and the reauthorization of the CCDF provides a unique, urgent opportunity for stakeholders in each system to support low-income parents' ability to get education and training by strengthening each system's approach to these families and by forging partnerships between the systems. This brief focuses on the opportunities provided by the reauthorization of the CCDF and lays out strategies states can use as they rework their CCDF policies and systems to conform to the new requirements to better meet the child care needs of low-income parents in education and training. Its companion paper focuses on the opportunities created by the reauthorization of the nation's workforce law with WIOA for better meeting these needs (Spaulding 2015). Both briefs build upon findings from several research projects conducted as part of a larger Urban Institute project, reported in *Bridging the Gap: Exploring the Intersection of Workforce Development and Child Care* (Adams et al. 2015), which focuses on the particular needs of low-wage and low-skilled parents who need child care in order to get education and training (see box 1).

This brief provides information on three areas:

- Understanding the issues—a brief discussion of the child care needs of low-income parents seeking education and training and an overview of the key relevant provisions of the newly reauthorized CCDF and WIOA.
- Key policy opportunities—a set of opportunities for policymakers seeking to better serve parents in education and training as states revise their child care systems to conform with CCDF reauthorization provisions.
- Next steps—challenges and opportunities in a time of transition.

The strategies suggested in this brief reflect insights of the research team, gathered across our research efforts for the Bridging the Gap project, as well as work the authors have done with states in recent years to simplify their child care assistance systems and link programs through the Work

Support Strategies project (Adams and Matthews 2013). These efforts have involved interviewing and working with policymakers and practitioners across the country, and thus the ideas presented here reflect their insights and experiences.

BOX 1

Bridging the Gap: The Intersection of Workforce Development and Child Care

With the support of the Ford Foundation and the Annie E. Casey Foundation, the Urban Institute is undertaking a phased set of studies examining the intersection of child care and workforce development. Papers published thus far for this project include this paper, as well as

- an analysis of national survey data on low-income parents and education and training efforts (Eyster, Callan, and Adams 2014);
- a review of state Child Care and Development Fund eligibility policies and services for parents in education and training (Adams et al. 2014);
- an overview of the intersection of child care and workforce development policy and practice (Adams, Spaulding, and Heller 2015); and
- a companion to this brief examining opportunities and challenges offered by the reauthorization of the main workforce development programs under the Workforce Innovation and Opportunity Act of 2014 (Spaulding 2015).

The current phase of the project focuses on identifying a range of challenges, barriers, and policy solutions related to meeting the child care needs of low-income parents seeking workforce development supports. It includes a deeper focus on policy barriers and strategies to support a more coherent and comprehensive interface between the child care and workforce development systems.

Background: Understanding the Issues

This section provides information on three related issues: first, key findings gleaned from our research on low-income parents, their need for education and training, and their child care needs; second, some of the key provisions of the CCDF reauthorization that states may want to consider as they think about how to meet the needs of these families; and third, a brief discussion of some of the opportunities presented by the reauthorization of WIOA.

A Brief Overview of the Intersection of Child Care and Workforce Support

Research conducted for our Bridging the Gap project provides useful insights into the needs of low-wage and low-skilled parents for education and training and the child care barriers they may face:

- Of the 21 million parents who are low income, almost three out of five (58 percent) have education levels at or below a high school diploma or General Educational Development certification (Adams et al. 2014). One in six US adults has only basic or lower levels of literacy, and almost a third possess only basic or lower levels of numeracy (OECD 2013).
- Only a small fraction of low-income parents—about 1 in 10—is enrolled in education or training (Eyster, Callan, and Adams 2014). Low-income parents in education and training can face additional challenges, including the fact that half of them are also working (with half of that group working full-time).
- The child care needs of parents seeking education and training can be complex because of scheduling challenges, the need for care for multiple children of different ages, and changing needs over time. Unfortunately, these needs do not easily fit the supply of child care options available to families, creating additional challenges (Adams et al. 2015).
- The child care needs of low-income parents needing education and training are not a high priority for either the child care system or the workforce development system, and both systems appear to have policies and incentives that can create barriers to serving parents who need education and training. For example, our research identified a number of CCDF eligibility policies that may limit the ability of parents seeking education and training to obtain child care subsidies (Adams et al. 2014).
- Parents in education and training make up a relatively small share of parents receiving child care assistance. In 2011, nationwide, only 12 percent of non-Temporary Assistance for Needy Families (TANF) parents receiving CCDF subsidies received child care assistance for education and training purposes, with eight states reporting that less than 5 percent of their non-TANF CCDF caseload received subsidies for workforce development purposes (Adams et al. 2014).

Opportunities and Challenges Related to CCDF Reauthorization

The 2014 reauthorization of the Child Care and Development Block Grant, which governs the CCDF, has some overarching goals that are particularly relevant to the needs of parents in education and training. These include

- making the system more family friendly so it is easier for parents to get and keep assistance;
- implementing policies that support children’s development by supporting continuity of care and access to high-quality care;

- supporting cross-system linkages between child care subsidy systems and other important safety net and early childhood programs and systems;
- supporting parents' ability to make informed choices about their child care options through stronger consumer education strategies; and
- strengthening the supply of child care to address gaps in underserved areas, including nontraditional-hour care as well as care for infants and toddlers and children with disabilities.

These goals and priorities are, of course, in addition to the ongoing state goals of using funds to support both child development and parental success in the workforce while ensuring program integrity and an accountable use of public funds.

However, the reauthorization of the CCDF also creates some serious challenges for states interested in improving services for parents engaged in workforce development activities. In particular, implementation of the reauthorization provisions, particularly those around health and safety reforms, will involve new costs for states, yet the reauthorization did not guarantee the additional funds needed to pay for these new requirements. (The statute does include a small increase in authorized funds over time,² though these increases are dependent upon the congressional appropriation process. The actual funds available for FY 2016 will not be known until the appropriation process is concluded.)

As a result, unless Congress authorizes significant new funds, or states choose to invest additional resources, states are likely to face difficult trade-offs that may include serving fewer children. Given that parents needing child care for workforce development activities are already a low priority in many states, child care experts interviewed as part of the Bridging the Gap project indicated serious concern that this funding situation may result in these parents being an even lower priority.³

Opportunities and Challenges Related to Reauthorization of WIOA

As described in detail in this brief's companion (Spaulding 2015), the reauthorization of WIOA creates new opportunities to better meet the needs of parents seeking education and training, as well as opportunities for partnerships with child care entities. For example, WIOA encourages states and localities to provide services to individuals (including single parents) who face barriers to employment; requires that an additional portion of funding be dedicated to serving out-of-school youth (which could include young parents); requires states to implement career pathway models which, by definition, require the provision of support services (which can include child care); provides additional funds for governors to develop special initiatives that could be used to finance innovative approaches (which could include efforts to support parents); and provides opportunities for child care partners to be included in planning and service delivery. However, many challenges remain, including inadequate funding, performance goals that may create disincentives to serve clients with barriers to employment, and variation in local implementation and priorities.

CCDF Strategies to Support Low-Income Parents Seeking Education and Training

Our work on the intersection of child care and workforce development systems, as well as our work with states on simplifying their child care systems, suggests that several policy areas are particularly relevant for states as they review their CCDF policies and practices in response to reauthorization. The policy strategies identified here support one or more of the goals of CCDF reauthorization, in that they support family-friendly policies (by ensuring that policies and practices reflect the realities of parents seeking education and training), linkages between different systems serving children and families, continuity of care (by minimizing breaks in service for children whose parents need child care to support education and training), enhanced consumer education (by focusing on the unique challenges faced by parents seeking to enroll in workforce development programs), and expanding the supply of care that can meet the needs of these low-income parents.

The sections below include strategies that states can use to

1. establish eligibility policies that recognize the unique needs and realities of parents seeking education and training;
2. simplify eligibility determination, verification, and oversight processes;
3. simplify the process of authorizing amount of care;
4. support child care continuity and stability by avoiding breaks in service;
5. develop stronger consumer education strategies for parents in education and training; and
6. build the supply of care to meet the needs of parents in education and training.

Strategy 1. Establish Eligibility Policies That Recognize the Unique Needs and Realities of Parents Seeking Education and Training

The first suggestion is that states examine their eligibility policies for low-income parents in education and training to ensure that they recognize the unique realities facing this population. Our examination of state 2012 CCDF eligibility policies (Adams et al. 2014) suggests specific steps states can take:

- **Remove eligibility barriers for parents seeking child care assistance to allow them to participate in education and training, and make them a higher priority for service.** Although in 2012 almost all states allowed parents to be eligible for child care assistance for at least one of the education and training activities examined (postsecondary education and training, high school or General Educational Development certification, and English literacy), several states did not. The activity least likely to count toward eligibility was English literacy education, with only 60 percent of states allowing parents to be eligible for subsidies for this purpose. (Note, however, that making education and training eligible activities for child care will not be sufficient to ensure that parents are able to actually receive assistance, since many states have waiting lists or may freeze intake or only serve priority families as a result of inadequate funds to meet the demand.

For example, in 2014 more than one-third of states had waiting lists or had frozen intake for at least some families [Schulman and Blank 2014].)

- **Avoid establishing requirements around work or time limits that may create barriers for parents in education and training.** Our research shows that over half the states (27) have established one or more *additional* eligibility requirements for these activities, though states vary widely in type and number of requirements.⁴ Some of these added requirements—particularly requiring parents to work while participating in education and training, limiting the length of time parents can receive child care assistance for particular workforce development activities, and establishing requirements as to how much time they must spend on the activity to be eligible—can create additional barriers for parents. Moreover, some requirements are likely to result in additional administrative burden associated with documentation, verification, and monitoring.

Ideally, state child care eligibility policies would support parents' ability to participate in education and training activities full-time if they can afford to do so (e.g., by not imposing work requirements for families in these activities), as full-time attendance can facilitate completion of programs or degrees. However, it is also essential for policies to recognize that many parents work while participating in education and training, which can make it difficult for them to meet requirements for minimum levels of participation. Parents who must work or who have major family responsibilities, as well as parents with lower basic skill levels, are likely to need more time to complete training and education programs as a result of these extra challenges. Stringent time limits will likely create barriers to success for such parents, so states with time limits should work with workforce development partners to ensure that the limits reflect the realities low-income parents face.

- **Carefully examine other restrictions on eligibility to ensure that they do not create challenges for parents with education and training needs.** As described in Adams and colleagues (2014), our research suggests that other relatively common blanket limitations on child care eligibility for parents in education and training may inadvertently restrict eligibility for families with important needs. For example, a limit on the number of degrees a parent can get may not recognize that in some cases multiple degrees may be necessary (such as the case of a parent who graduated from college several years ago with a degree in English and now desires a vocational degree). A restriction requiring that parents earn a particular grade can be useful in ensuring that resources are not spent on parents who are failing. For parents who have been out of school for a long time, however, some initial failing grades may simply serve as a measure of the challenges of adjusting to being a student again. In both these areas, it would be useful to explore potential strategies that would accomplish the state's reasonable goals without penalizing parents with reasonable needs.
- **Create incentives for parents to enroll in education and training programs that are linked to improved employment outcomes.** In recent years, the workforce development field has become increasingly concerned about supporting enrollment in workforce development activities that are likely to support parents' trajectory toward gainful employment. Our research found that

some states currently limit eligibility to programs at approved institutions or only support enrollment in programs likely to lead to employment in a particular occupation. One possible approach, building upon this concept, would be for states to work with workforce development agencies to identify a subset of approved institutions or activities and to create incentives (e.g., presumptive categorical eligibility, easier enrollment, fewer verification requirements) for enrollment in these approved activities. If developed in concert with best practices in the workforce domain, such restrictions could support more successful outcomes. However, it would be important to ensure that these lists of institutions and activities are flexible so they can evolve over time as workforce development opportunities change in response to the changing job market.

Child care subsidy agencies might consider working closely with education and training experts in the state as they consider all these strategies, to help ensure that they reflect both the realities facing parents engaged in education and training and the kinds of workforce development programs and services available to families. Such interagency cooperation would support the goals of the WIOA and CCDF reauthorizations, both of which stress cross-system linkages.

Strategy 2. Simplify Eligibility Determination, Verification, and Oversight Processes

The second set of strategies concerns simplifying the process of determining and verifying child care eligibility for parents in education and training. Our review of state policies suggests that states take a wide variety of approaches to this process, with some approaches being more complicated and burdensome for parents and caseworkers. For example, one state required that, in addition to proving enrollment in an education program, parents provide proof of initial testing within the first month. Interviews with experts across the country also revealed that parents can face challenges enrolling in workforce development activities if they do not have child care, but that, conversely, they cannot get child care without proof of enrollment.

Such approaches are likely to create barriers for clients, increase administrative burden, and be prone to error, contributing to program integrity problems. Our work with states around simplifying subsidy policies and practices through the Work Support Strategies initiative⁵ provides useful insights into ways states may be able to develop more family-friendly policies in this area while reducing administrative burden and retaining their focus on accountability and integrity (see box 2).

These simplification principles, in combination with the principles and priorities of the reauthorization, lay the groundwork for specific strategies that states could consider to make it easier for low-income parents to participate in education and training. In particular, following the reauthorized CCDF's focus on building linkages with other systems and programs, state or local child care subsidy agencies might work to build strong partnerships with major education and training providers (such as work investment boards, major postsecondary institutions, community colleges, and major workforce development organizations) in their states to explore the following options:

- **Consider borrowing from the model of the TANF program, in which parents' enrollment in particular job activities (as defined by the state) makes them presumptively categorically eligible for child care subsidies.** One strategy would be to explore the concept of presumptive eligibility, which is already used to facilitate TANF recipients' eligibility for child care. Under this practice, enrollment in one program is used by another to prove eligibility presumptively (at least for some eligibility criteria). States could consider whether proof of enrollment in particular workforce development programs could serve as proof that the parent is engaged in an appropriate activity for child care, thus streamlining the verification process. The subsidy agency would then only have to determine whether enrolled parents meet select other eligibility criteria (such as income, age of child, and so forth). This practice could significantly reduce paperwork and verification demands on both parents and agency workers.
- **Develop communication mechanisms with major education and training providers** to allow the state or local child care subsidy agency to communicate directly with the provider to know when a parent is enrolled (or is seeking to be enrolled) in an eligible activity and to be able to communicate directly about ongoing eligibility. Such communication could significantly reduce client burden and support program integrity.
- **Explore whether child care subsidy and workforce development agencies can work together to support parents whose enrollment in education and training activities is dependent upon their ability to get child care.** As noted above, parents can face a catch-22 if their workforce development provider will not approve them for enrollment because of a lack of child care and their child care subsidy agency will not give them a subsidy because they do not have proof of enrollment in a workforce development activity. Workforce development and child care subsidy agencies should work together to identify strategies to address this challenge. For example, though it might be challenging to operationalize, would it be possible for workforce development partners to provide parents with documentation stating they have been accepted into the workforce development program pending approval of child care subsidy eligibility, and for child care agencies to accept this documentation as provisional proof of enrollment (or vice versa)? Could states provide limited funding to pay for care during this provisional period without triggering the full requirements of the CCDF subsidy system? Are there other strategies to consider?
- **Consider expediting eligibility and access to subsidies for parents enrolling in priority education and training activities.** Child care subsidy agencies could work with education and training and workforce development experts to identify activities that are more likely to result in successful employment and provide easier access to subsidies for these activities.

BOX 2

Key Principles in Simplifying Child Care Processes to Determine and Monitor Eligibility

The goals of the CCDF can be compromised by burdensome policy requirements and administrative processes that make it challenging for low-income families to get and keep child care benefits. In addition to making it more difficult for parents to obtain benefits and maintain continuity of care for their children, these complexities create significant administrative burdens and inefficiencies for struggling public agencies and can contribute to program integrity problems.

A recent publication by the Urban Institute and the Center for Law and Social Policy, *Confronting the Child Care Eligibility Maze* (Adams and Matthews 2013), highlights key steps states can take to simplify the process of getting and keeping child care benefits. Many of the issues Adams and Matthews discuss are relevant for low-income parents who need child care assistance to participate in education and training. The information below is taken from this report.

Eligibility elements and definitions. To simplify eligibility, it is first essential to examine what eligibility requirements are in place and how they are defined. The two critical steps here are (1) identifying the core set of required child care eligibility criteria and (2) simplifying how eligibility elements (such as family unit, income limits, countable income, and what activities—work, job search—make a parent eligible) are operationalized, aligning them when possible.

Documentation and verification. State choices about how to verify clients' eligibility for these core requirements can significantly affect both client and administrative burden. Some key steps that can help simplify and align documentation and verification are to

- 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,
- verify only 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, and
- simplify submission of information (including allowing updates online; electronic customer accounts; and submission by email, text, fax, or phone).

Strategy 3. Simplify the Process of Authorizing Amount of Care

The third area of reform that states might consider as they work to implement the goals and requirements of reauthorization is to simplify the process of authorizing care. Our review of state policies as reported in the CCDF database suggests that a number of states have complex rules around identifying the appropriate number of hours to authorize for workforce development activities. These rules can involve calculations of study time, homework time, or commuting time, and can entail such complexities as different ways of calculating hours in labs versus hours in classrooms and dealing with gaps between classes and lunch breaks. Some states seem to tie their authorized hours of care tightly to parents' specific class schedules; for example, one state would only approve child care between classes in the day if the classes were scheduled in such a way that "it does not make sense to pick up the child between classes" (Minton, Durham, and Giannarelli 2014). Such rules can challenge parents' ability to use subsidies in child care centers and with other providers that are likely to require full-time payments and regular schedules of care. For example, unpublished Urban analyses of National Survey of Early Care and Education data find that in 2012, only a quarter of centers that charge parents reported allowing parents to pay for and use varying amounts of care each week.

These complexities are problematic on multiple fronts: they are likely to limit parents' ability to access some providers, to create significant client and administrative burden, and to be prone to error and therefore challenge program integrity. They also undercut several goals of the CCDF reauthorization and priorities of the Office of Child Care by making it more challenging for parents to use their subsidies to purchase high-quality stable care or to maximize continuity of care for their children. In addition, nothing in the federal statute or regulations requires states to tie authorized hours of care to the schedules of eligible activities. The Office of Child Care has sought to clarify that states are not required to tie authorizations to parent schedules, both in the 2013 Notice of Proposed Rulemaking and through guidance provided through technical assistance and direct communications with states. (For more discussion of the issues around tying authorization to parent schedules, see Johnson-Staub, Matthews, and Adams [2015].)

Strategies that states may want to consider exploring as they revamp systems in response to reauthorization include the following:

- **Consult with lead workforce development partners to identify common patterns of enrollment and common schedules for education and training activities, and ensure that authorization policies support parents' ability to use these activities.** For example, eligibility policies may make it challenging for parents to use a short-term program that requires intensive training or other unusual schedules or requirements (Adams and Katz 2015).
- **Work with education and training partners to identify simpler ways to authorize hours for workforce development activities, similar to the less complex full-time and part-time categories often used for authorizing care for employment purposes.** For example, child care agencies could work with education and training providers to identify what they consider to be full-time involvement in their activities, and use that metric to authorize full-time child care. In other

words, if the lead postsecondary education institutions consider 12 credits, or four courses, to constitute full-time enrollment, establish that as the equivalent of full-time involvement without the complexities of calculating homework, labs, lunch breaks, and so forth. Similarly, since many low-income parents combine work and education or training, identify easier ways to determine full-time or part-time authorization levels for these activities. Although such efforts would likely be more complex for short-term or episodic training efforts, metrics that reflect the realities of client experiences could no doubt be identified in collaboration with workforce development partners.

- **Support continuity of care and access to high-quality providers by removing the overly restrictive link between the actual schedule of classes and the hours the family is authorized for care**, and ensure that the approach to authorization supports parents' ability to purchase quality stable child care. Consider supporting the child's needs for high-quality child care options (which are more likely to be available during traditional work hours of 8 a.m. to 6 p.m.), and allow parents to use their vouchers to purchase these options during the day, as well as additional child care services during evening and weekend schedules if demanded by workforce development activities (Adams and Katz 2015).

Strategy 4. Support Child Care Continuity and Stability by Avoiding Breaks in Service

The fourth area of reform builds upon the goals of reauthorization to minimize breaks in service and support continuity and stability of care. In particular, states are now directed to provide eligible parents with a year of subsidy when they apply and to keep providing care during temporary breaks in eligibility as long as their income stays below 85 percent of the state median income. States have the option of terminating services if parents experience a nontemporary job loss or termination of their eligible activity, though states must give parents at least three months of additional subsidy coverage for job search or to resume attendance at a job training or educational program.⁶

This new requirement may have significant implications for parents in education and training, depending on the details of guidance from the Administration for Children and Families and state-level policy decisions. For example, parents who are enrolled in postsecondary education programs could have the ability to keep their subsidies through winter and spring breaks, as well as over summer breaks.⁷ This new requirement would likely also apply to families seeking child care for short-term training activities, if the state determines them to be eligible for child care assistance under the CCDF. Although the requirement that parents be given a year of subsidy could create a disincentive for states to make parents in short-term activities eligible for assistance, state child care agencies should work with workforce development partners to better understand some of the scheduling patterns, the extent to which parents are coupling these activities with work, and the duration of common activities (which would potentially trigger the three-month extension). Information about these kinds of issues could allow states to better understand the implications of offering subsidies to these families and to identify

whether and under what circumstances they might want to consider employing the three-month period of continued assistance for families who are no longer engaged in allowable activities.

Strategy 5. Develop Stronger Consumer Education Strategies for Parents in Education and Training

This strategy concerns the importance of helping parents in education and training understand their child care options and of having state and local child care experts work closely with education and training partners to get this information to parents. Consumer education is a major focus of the reauthorized CCDF, which requires states to provide consumer education information to help parents make informed choices about child care services and to promote parent and family member involvement in the development of children in child care settings.

Our research suggests that finding information about child care options and care that meets their unique needs can be challenging for low-income parents seeking education and training, as well as for workforce development providers working to support them. The complexity of matching parents' needs and schedules to local child care options can be particularly difficult (Adams et al. 2015). Consumer education could be especially powerful in assisting parents who need child care to enroll in workforce development programs, and could also be helpful to the education and training providers who seek to help them. Options states could explore in this area include the following:

- **Develop targeted consumer education materials for parents with unusual scheduling challenges,** and work with workforce development practitioners to make these resources available to their staffs and to individuals working with parents in workforce development programs.
- **Create partnerships between lead workforce development organizations and providers and state and local child care resource and referral agencies to provide enhanced resource and referral services to parents in workforce development activities.** For example, colocate child care resource and referral staff at One-Stop centers or local community colleges, or contract with child care resource and referral staff to provide enhanced services.
- **Build relationships between local child care agencies and experts and individuals in workforce development organizations who provide client counseling, case management, or career navigation services** to facilitate more informed child care support and to support “warm-handoff” referrals to child care entities.

Strategy 6. Build the Supply of Care to Meet the Needs of Parents in Education and Training

A final strategy states may consider is to work to address the gaps in the supply of care available to parents in workforce development programs. The CCDF reauthorization instructs states to address gaps in the supply of care for special populations and highlights the importance of addressing gaps in the supply of care for families needing care during nontraditional hours. Research has consistently found

that nontraditional-hour care is in short supply. For example, unpublished Urban analyses of National Survey of Early Care and Education data find that in 2012 over 90 percent of child care centers were only open during standard hours (6 a.m. to 7 p.m.). This fact is particularly relevant for parents enrolled in education and training activities (many of whom may also be working) as the schedules of such activities can be complex, involve nontraditional hours, and vary over time.

This is a complex area that is important for states to explore. In particular, one critical step is for states to first understand the real needs of families in education and training to ensure that any steps taken to address supply gaps are aligned with their needs and preferences. Understanding families' needs would help states meet the CCDF requirement of supporting parental choice, and would also make states' attempts to address those needs more likely to be successful. However, there is unlikely to be a "one size fits all" solution that will meet the needs of all parents seeking to enroll in workforce development activities. For example, although some families may prefer to use center-based care located on the campus of their postsecondary education institution, others may need care during evenings and weekends, care that can serve their school-age children, care that is located close to their home, or care that is convenient to their combined employment and workforce development activities. In other cases, parents may prefer to use a friend or relative to minimize disruption for the child if the activity is a short-term one or involves needing care late at night. If the activity is longer term and will involve cohorts of families with young children, it may be appropriate to work with child care providers to make services available to meet their needs, whether by adjusting an existing program or developing a new one. It will be essential for states to consider a range of strategies and solutions that meet the varied needs of families enrolled in education and training activities.

To assess the needs of families participating in education and training activities, state child care agencies should again coordinate with experts from the workforce and postsecondary institutions in their states to assess needs and opportunities. They can also coordinate with child care resource and referral agencies and other experts to assess the extent to which options are available to meet the identified needs of families in this situation and the gaps in resources to fill those needs.

Finally, states may want to explore how to think about quality of care in the context of nontraditional-hour care. As noted above, most child care centers are not open during nontraditional hours, and it is not clear that parents enrolling in education and training programs would necessarily want or use center-based care to meet their needs during these hours. Although all care needs to meet basic health and safety requirements (and the new monitoring requirements of the CCDF reauthorization), care during evenings and weekends may not need the same kinds of early education quality requirements that are desirable for care during standard hours. However, there is no consensus as to what "quality" means for nontraditional-hour care. Further exploration of these issues would be helpful as states work to meet the needs of these families.

Next Steps

The recent reauthorizations of CCDF and WIOA provide states with a unique, urgent opportunity to better meet the needs of low-income, low-skilled parents in education and training as they review and revise their child care systems. Many of the strategies identified in this brief involve collaborating with workforce development partners to ensure that CCDF policies and practices better reflect the realities faced by parents in the workforce development system and to streamline administrative practices and minimize client burden. These strategies also have the ability to help workforce development systems as they respond to the reauthorization of the WIOA (Spaulding 2015). However, such collaborations will be new for many states. Derrick-Mills (2012) found that more than half of state CCDF administrators had no collaborative relationships with their counterparts in the state workforce investment board, and that more than 65 percent said their lead agency did not consult at all with city, county, or regional workforce investment boards or workforce agencies, or with city, county, or regional One-Stop operators.

It is important to recognize that states will face serious challenges as they implement the provisions of the reauthorized CCDF. There is significant concern that many requirements of the reauthorization will necessitate major new expenditures by states unless substantial new funds are provided to meet these costs. As a result, states will likely have to identify ways to reduce costs in other areas. There is some concern that in response to these financial pressures they may choose to reduce services to low-income parents needing child care for education and training.

This is a time of great opportunity for policymakers and practitioners interested in reducing the child care barriers low-income parents seeking education and training face. Both the child care and workforce systems are in a time of transition and have incentives to collaborate to better meet the needs of parents. However, it is also a time of risk, as inadequate funding for both the CCDF and WIOA creates significant barriers to systemic change in both systems. It is essential that policymakers and practitioners from both the child care and workforce domains take steps quickly during this time of transition to support and protect low-income parents' ability to improve their skills so they can better support their children's well-being and healthy development.

Notes

1. Scott Neuman, "Rubio: Small Government Can Help Fix Economic Inequality." *The Two-Way* (blog), *National Public Radio*, July 21, 2014, <http://www.npr.org/blogs/thetwo-way/2014/07/21/333211643/rubio-small-government-can-help-fix-economic-inequality>; Barack Obama, "Family-Friendly Workplace Policies Are Not Frills: They're Basic Needs." *Huffington Post*, June 23, 2014, http://www.huffingtonpost.com/barack-obama/family-friendly-workplace_b_5521660.html?1403532355.
2. As described in a guide to the reauthorization prepared by the Center for Law and Social Policy and the National Women's Law Center, "while Congress recognized that some additional resources were needed to implement the law, it only increased the authorization levels for discretionary CCDBG [Child Care and Development Block Grant] funding (the funding specified each year in the annual appropriations measure) by 16 percent over six years, an increase of less than \$400 million above total funding for the same period at the fiscal year (FY) 2014 (pre-reauthorization) funding level. Moreover, these funds are not guaranteed and must

be allocated by Congress each year. The law does not increase the mandatory portion of CCDBG funding . . . States are also required to contribute funding in the form of state matching and maintenance-of-effort (MOE) funds” (Matthews et al. 2015, 3).

3. For more information on reauthorization, see the Office of Child Care website at <http://www.acf.hhs.gov/programs/occ/ccdf-reauthorization>, as well as the recent report on Child Care and Development Block Grant reauthorization by Matthews and colleagues (2015).
4. These requirements include limiting postsecondary education eligibility to particular types of degrees or a limited number; limiting eligibility to education and training activities that are likely to lead to immediate employment; requiring parents to work while participating in education and training; limiting the length of time parents can receive child care assistance for particular workforce development activities or establishing requirements as to how much time they must spend on an activity to be eligible; limiting eligibility to performance, such as grade requirements; and limiting eligibility to enrollment in workforce development activities that involve preapproved training vendors or institutions to assure quality (such as requiring use of an accredited program) (Adams et al. 2014).
5. For additional information about the Work Support Strategies initiative, see <http://www.urban.org/work-support-strategies>.
6. “CCDF Reauthorization Frequently Asked Questions,” March 25, 2015, Office of Child Care, Administration for Children and Families, <http://www.acf.hhs.gov/programs/occ/resource/ccdf-reauthorization-faq>.
7. Ibid.

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