



*"a catalyst for strong families
and powerful communities
where children matter most."*

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Thank you for the opportunity to comment on the Illinois Department of Human Services' (IDHS) Child Care and Development Fund (CCDF) State Plan for FFY 2016 - 2018. Illinois Action for Children is a state wide organization and our mission is to be a catalyst for organizing, developing and supporting strong families and powerful communities where children matter most. Our organization's focus is on Chicago and Cook County. We administer the Child Care Assistance Program (CCAP) and ExceleRate, the state's Quality Rating and Improvement System, in Cook County.

We appreciate the inclusive process and the thoughtfulness that went into the drafting of the state's CCDF plan. Our comments will focus on a few areas where we believe minor changes can improve the overall child care experience for children and families across Illinois.

Eligibility

The Illinois state plan defines a non-temporary disruption in employment as a period of more than 90 days. Examples provided include "medical or maternity leaves that exceed a twelve week grace period." However, federal language classifies extended medical and maternity leave as a "temporary" disruption in employment and does not limit it to 90 days. We recommend that IDHS use a more generous definition for extended medical and maternity leave and classify both as "temporary" disruptions because the individual continues to be employed and will transition back to the workplace in due time. Yet overall, we are pleased to see that IDHS still intends to serve all eligible applicants.

Graduated Phase-out

Families who experience an increase in income, but continue to earn below 85 percent of the state's median income, will see a graduated phase-out of assistance. Although the graduated phase-out provisions have yet to be met by the state, IDHS' plan for implementation remains vague. We are concerned that co-payments are not referenced in this section, so it is not clear what the co-pay schedule will look like if a family's income increases. We recommend that IDHS publish a co-pay schedule so families can immediately understand how their rate will be affected. We would also like IDHS to clarify when cases will be terminated if income does rise above 85 percent of state median income.

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Redetermination

IDHS writes that there will be a “check-in/reporting for renewal at 9 months. If the family remains eligible, they will remain in the program for the next 12 months. If not eligible, the family will get a 90-day phase out period.” Based on this language, it is not specified whether redetermination occurs at the 9 month period or if Child Care Resource and Referral (CCR&R) agencies will reach out to CCAP families to gather the necessary documents for benefit renewal at that time.

Under the reauthorization of the Child Care and Development Block Grant (CCDBG) of 2014, the federal government explains, “each child who receives assistance...will be considered to meet all eligibility requirements for such assistance and will receive such assistance, for not less than 12 months before the State or designated local entity redetermines the eligibility of the child.” If IDHS chooses to redetermine families at 9 months, the department will not be in compliance with federal law. Hence, we respectfully urge IDHS to clarify in its state plan that no interim reporting or redetermination will occur until the twelfth month, including to assess the need to phase-out assistance.

Increasing Access for Vulnerable Children and Families

CCDBG placed an emphasis on easing access to services for children and families experiencing homelessness. Illinois Action for Children supports IDHS' decision to establish homeless children as a priority CCAP group and as categorically eligible. We are also in favor of a training that will help providers identify signs of homelessness. These steps will help ensure this underserved population receives the necessary access to child care services.

In addition, the law calls for Lead Agencies to establish a grace period for homeless families to submit the required documents. The state plan indicates that IDHS will be in compliance by September 30, 2016, stating that “IDHS will allow homeless children to receive CCDF assistance after an initial eligibility determination but before providing required documentation.” However, the plan does not specify the length of the allowable grace period for families. We recommend a 90 day grace period for families to align it with Head Start standards.

Health and Safety Training

We applaud IDHS' decision to accept the Planning, Implementation and Compliance (PIC) Committee's suggestions related to health and safety trainings for providers. IDHS is committed to continue supporting CCR&Rs with technical assistance to facilitate connecting providers to training opportunities available. By easing the training process for providers, it will allow the state to meet its goal of increasing the quality of care for children.

In the state plan, IDHS writes “relatives are not exempt from CCDF health and safety training requirements.” Yet, federal policy allows Lead Agencies the option to exempt relative providers from these requirements because it would be too burdensome. We agree with the federal language that obligating relatives to seek these trainings is not necessary, as this group of providers make a

necessary service available to family members. Illinois Action for Children hopes IDHS will reconsider this policy to make it more family-friendly.

Monitoring License-Exempt Providers

Federal law requires at least one inspection per year for license-exempt providers receiving CCDF funds. In an effort to comply, IDHS described its plans to use Workforce Innovation and Opportunity Act (WIOA) funds to train a sufficient number of individuals to serve as CCAP monitors and address the shortage of inspectors.

We are concerned with the decision to use WIOA funds to train new child care inspectors. The impetus behind WIOA is to offer individuals trainings to develop new skills that are highly sought-after in today's job market. We believe using WIOA funds to train child care inspectors is not in alignment with the federal intent of that legislation, nor would it be an efficient or effective use of federal money. Monitoring positions are unlikely to represent realistic career ladders for trainees as the skills are not transferable to in-demand occupations that offer possibilities for higher pay and career advancement. Also, there may not be continuous access to additional trainings for monitors.

Illinois Action for Children strongly believes IDHS should leverage the expertise in the early childhood field while building on the infrastructure of support, compliance and monitoring already in place in Illinois for early childhood programs. We agree with the PIC Committee and recommend that individuals hired to serve as monitors be "knowledgeable about child development, [have] experience working with child care settings and be mandated reporters."

Monitoring Relative Providers

We are also concerned that IDHS has yet to develop a policy related to inspections for relative providers. CCDBG allows Lead Agencies the option to exempt relatives from inspection requirements. We agree with the PIC Committee that IDHS should not monitor relative providers because it would place an additional burden on this group of providers, as well as those families who rely on this form of care. This additional burden is likely to drive many relative providers away from providing child care services for their relative children, who may be without other child care alternatives. Specifically, relative providers fill a critical gap in the child care market. They often care for children during non-traditional hours and in the child's home. In addition, these children usually grow up in at-risk environments, making them the hardest to reach. By exempting relative providers from unnecessary monitoring requirements, we would help ensure care is available to working families when they need it.

Equal Access

Under the equal access provision of CCDBG, Lead Agencies should strive to reimburse providers serving CCAP families at 75 percent of the market rate. Ideally, this payment rate would give families greater access to providers, enhancing their choices for child care services. Currently, IDHS

reimburses providers based on a variety of factors, but the rates generally do not fall in line with the market rate. Despite not setting rates at 75 percent, IDHS describes in the state plan that through the use of ExceleRate quality add-ons, families receive equal access to higher quality child care services. Given that only a small fraction of providers receive ExceleRate add-ons, it is unlikely that the availability of add-ons will be sufficient to address the equal access provision of CCDBG.

According to IDHS' data, "76% of Licensed Family Child Care providers and 69% of Licensed Child Care centers on the Statewide Child Care provider database are willing to serve CCAP children and families." We are concerned that providers who report a willingness to serve CCAP children are not equally distributed across the entire state, which would interfere with the ability of all CCAP families to receive equal access to services.

Suspension and Expulsion Policy

Illinois Action for Children believes language should be added into the state plan regarding a suspension and expulsion policy for providers receiving CCDF funds. In 2015, the Illinois General Assembly passed a bill to address the overuse of suspensions and expulsions as forms of discipline within the K-12 education system. However, suspension and expulsion rates are three times higher in early care and education programs compared to the K-12 system. Certain students are disproportionately affected, including boys, children of color, children who do not speak English as a first language and children with disabilities.

We recommend IDHS develop a policy to limit the use of suspensions and prohibit expulsions by providers receiving CCDF funds, in an effort to improve the quality of care for all children. As recommended by the PIC Committee, suspensions should only be used as a final recourse, programs should utilize trauma-informed practices and staff should receive training on methods to address students' challenging behaviors.

Illinois Action for Children would like to once again thank the Illinois Department of Human Services for the opportunity to comment on the Illinois CCDF State Plan for FFY '16-'18. We believe the department has drafted a solid plan to comply with CCDBG rules and regulations. The few changes that we recommend in our comments would go a long way toward improving child care services for low-income children and families. We look forward to our continued efforts to support working families across Illinois.

Sincerely,



Sessy Nyman
Vice President, Policy and Strategic Partnerships