



## **State-Imposed Child Care Policies Prevent Parents from Working: Results from a Survey of Child Care Payment Program (CCPP) Child Care Providers**

Mississippi Low-Income  
**Childcare** Initiative

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### **Summary of Findings:**

Survey findings provide strong supporting evidence for these critical child care policy reforms that will improve and increase parents' access to employment, training and education:

#### **Simplify the application and redetermination process by removing red tape that providers and parents report as common, recurring and preventable.**

The state-designed application and redetermination process and state policy choices result in commonly experienced problems that providers describe as unworkable, lacking in reciprocal communication, rigid and punitive:

- 79.2% of providers serve CCPP-eligible parents who are unable to get approved for CCPP
- 62.4% of providers report the CCPP application process is difficult for parents they serve
- 74% of providers report working parents they serve lost CCPP assistance during recent redetermination (an average of 6 parents), an estimated 3,600 - 4,100 parents statewide

#### **Remove the Child Support Cooperation Policy from Child Care Payment Program (CCPP) eligibility requirements.**

The state-imposed child support requirement is overwhelmingly experienced as obstructive, harmful to parents' efforts to obtain CCPP assistance and the **primary reason** parents they serve cannot access CCPP:

- 83.2% of CCPP providers say the requirement deters parents from applying
- 73.2% of CCPP providers say the requirement results in parents' CCPP application denial
- An estimated 5,500 – 6,300 parents and 9,700 – 11,100 children in CCPP-participating centers are prevented from accessing CCPP due to this requirement

#### **Increase the number of parents receiving CCPP.**

Issues in the application and redetermination process result in centers reporting waiting lists of CCPP-eligible parents who need child care:

- 56.4% of providers report a current waiting list of parents
- 65.2% of these providers say parents on their waiting list are CCPP-eligible
- An estimated 6,700-8,100 parents are on waiting lists statewide (CCPP providers cite the child support requirement as the primary reason parents don't get approved for CCPP assistance)

## Introduction

The Mississippi Low-Income Child Care Initiative (MLICCI) advocates for policies and program models that explicitly seek to improve economic security for women and single moms. Through decades of policy advocacy, research and direct services centering the needs of single moms and child care providers, MLICCI's work is informed by a foundation of institutional knowledge with regard to policymaking in the Child Care Payment Program (CCPP). Having observed multiple state government leaders' varying approaches to CCPP, MLICCI has built a body of experiential knowledge from those who are the primary consumers and end-users of the CCPP system—single moms with young children and child care providers who serve them.

The most critical work support that single moms need to be economically secure is stable and affordable child care. Child care is expensive and unaffordable for low-income working parents, leaving it inaccessible without assistance. In Mississippi, poverty is concentrated in single-mom-headed families, single moms are disproportionately represented in low-wage work and their opportunities for advancement require child care as a support service. The federally-funded program that is designed to provide this support is CCPP.

When parents are unable to access CCPP, they are unable to access stable and affordable child care. When parents are unable to access child care, they are prevented from working and seeking economic security. This inability to access CCPP leaves single moms languishing in low-wage work that does not support their family's needs.

MLICCI surveyed active CCPP child care providers about their perspectives and experiences with the parents they serve regarding the CCPP application process, the CCPP child support requirement, their center's waiting list and recent CCPP parent redeterminations. The findings reveal the primary issues parents and providers are dealing with in CCPP are within the state's policymaking authority to reform.

Mississippi continuously ranks at or near the bottom in national measures including child poverty, labor force participation and median wages. While the COVID-19 Pandemic has exacerbated these issues that are experienced disproportionately by women and black single moms heading families in Mississippi, it has also resulted in an unprecedented level of federal funding made available for child care assistance for working parents – nearly \$200,000,000 in additional federal funds.

Resoundingly, the survey finds that CCPP providers in Mississippi want more children to receive CCPP assistance; the child support requirement deters and prevents participation in CCPP; the application process is experienced both by parents and providers as cumbersome, lacking in reciprocal communication, rife with process issues such as documentation uploads and submissions that are commonly reported as being sent and not received; and the rigid nature of timelines are unworkable for parents and providers, particularly considering there are no designated navigators or case managers that are available to work closely with parents through the process.

Mississippi has a rare opportunity to connect more families than ever before to affordable child care with additional federal funds beginning in 2021. The potential benefit of this unprecedented opportunity relies on Mississippi reforming state rules and processes in the CCPP program so single moms and their families can experience equity in economic opportunity that was sorely needed before the COVID-19 Pandemic and is now only more urgent.

### **Survey Distribution**

The Mississippi Low-Income Child Care Initiative (MLICCI) distributed a paper survey in August 2021 through postal mail to every active Child Care Payment Program (CCPP) center listed as of December 2020. This list is comprised of 877 licensed child care centers that accept CCPP subsidies and includes specific contact information for center directors, owners and the center's physical location. MLICCI received 250 unique responses completed by directors of CCPP-participating centers. MLICCI did not exclude any completed response. MLICCI is unable to account for any bias in response or non-response. The respondents represent a large segment of the CCPP universe and the make-up of the respondent group is representative of the range of CCPP providers throughout the state of Mississippi with regard to center size, enrollment, licensed capacity and geographic location (widespread with urban and rural representation). Respondents participated in the survey voluntarily and their responses, while including identifying information to prevent duplication in survey findings, are kept anonymous. No financial or other incentive was provided to respondents to complete the survey.

### **What is the Child Care Payment Program?**

The Child Care Payment Program (CCPP) is the name Mississippi assigns to its federally-funded Child Care and Development Fund (CCDF) program. Mississippi receives a combination of federal revenue streams each year that make up CCDF, primarily from the Child Care and Development Block Grant (CCDBG). CCPP provides child care assistance in the form of vouchers parents apply for and take to the participating child care center of their choice to enroll their children. Parents with income above the poverty level are charged a co-pay based on family size and income. The child care voucher reimburses centers for a portion of a parent's child care fees. CCPP significantly reduces a parent's child care costs, making it affordable for low-income families. Federal rules require parents to be working or attending education or training for 25 hours per week and income eligibility is capped at 85% of State Median Income. Much of the program design and other eligibility rules are left to the discretion of state Lead Agencies. The Mississippi Department of Human Services (MDHS) is the Lead Agency for CCPP.

States are also allowed to impose other rules in CCPP, not explicitly required or offered as an option for states. For instance, Mississippi opts to require parents to cooperate with child support enforcement before they can be eligible for child care assistance, when this requirement is not federally mandated.

When a parent receives CCPP, it reduces their child care costs significantly. Because child care is so expensive, CCPP assistance provides one of the single biggest boosts to a parent's economic

security—relative to other forms of public assistance, it carries a high dollar value. This means single moms can retain more of their earnings to afford other expenses while their young children have access to high-quality care and early education settings.

## **The Child Support Requirement**

### ***2021 Survey Results Show the Child Support Requirement is a Major Problem***

Based on survey results, the state-imposed child support requirement in CCPP is overwhelmingly experienced as the primary reason for parents' denial or loss of child care assistance and the primary reason parents who need assistance choose not to apply.

The survey included two structured questions regarding the child support requirement. One asked if parents being served have been denied CCPP assistance because of the child support requirement and another question asked if the CCPP child support requirement keeps parents from applying to CCPP.

The survey also asked CCPP respondents to provide the number of parents they serve that have been denied CCPP or deterred from applying due to the child support requirement.

#### **The CCPP "Child Support Requirement"**

The "child support requirement" is a Mississippi Department of Human Services policy that requires applicants to CCPP who are single parents to "cooperate" with child support enforcement rules.

Here's what that means: a single mom who is otherwise eligible for CCPP (i.e. she meets the work and income requirement) also has to assign the rights to establish paternity for the children they are seeking assistance for and initiate a child support collection order through the MDHS Child Support Enforcement division. If a single mom wishes not to comply or if she is unable to complete required steps as assigned by the child support enforcement division, she is denied child care assistance.

While the child support requirement is part of the CCPP application process, it functions as a separate and simultaneous application process. A single mom is required to interact with a different division within MDHS to comply, she is subjected to a compliance process that requires communication, information and documentation sharing, the application of complicated exemptions and is subject to bureaucratic procedural breakdowns, such as internal documentation hold-ups and timelines, wholly separate and apart from her CCPP application process.

MLICCI supports all parents paying their share to support their children and single moms who wish to voluntarily cooperate with the child support requirement. However, moms should not be denied the child care assistance they need based on child support compliance. Also, MLICCI has learned from CCPP eligible moms they have many and good reasons not to comply. Often, they negotiate informal support based on changing employment circumstances of the dad/non-custodial parent. Sometimes, they fear retaliation from the dad/non-custodial parent.

Seventy-three percent of CCPP providers say the child support requirement has caused parents they serve to be denied CCPP. As one respondent commented: “child support - they will not even try”. An overwhelming majority of respondents—83.2%—reported the child support requirement deters parents from applying to CCPP.

CCPP providers reported nine of their parents, on average, had been denied CCPP or deterred from applying due to the rule. Based on these data, if we assume 75% of CCPP providers experience what the average survey respondent reports, MLICCI estimates 5,500 – 6,300 parents served by current CCPP providers throughout the state of Mississippi have been denied or deterred from applying to CCPP because of the child support requirement. Extending this estimate beyond parents, using average family size figures as reported for Mississippi in the most recent federal data, MLICCI estimates between 9,700 – 11,100 children across the state are currently prevented from accessing CCPP due to the child support requirement.<sup>1</sup>

Just in the survey sample of currently active CCPP providers, those responding in the affirmative to the two structured questions reported a total of 1,449 parents that were denied CCPP or had not applied to CCPP because of the child support requirement. Given the salient affirmative response and the extent to which the issue and topic resonates with a significant majority of respondents, it is likely these experiences are common throughout the CCPP universe.

#### **The child support cooperation requirement is NOT federally mandated in CCPP**

In 2004, Mississippi implemented the requirement that single parents (virtually all of whom are single moms) comply with child support in order to be eligible for CCPP. Failure or inability to “cooperate” results in the denial of her application for CCPP child care assistance.

Mississippi carves out a few narrow exemptions for working parents trying to access CCPP, but only for the most extreme cases involving rape, incest, physical and emotional harm, or where a legal adoption is pending. Even these exemptions require extensive documentation and evidence that proves difficult for single mothers to obtain and provide MDHS.

Federal CCDF rules encourage states to avoid imposing policies that create an undue burden and disruption in work, education or training for parents applying or being re-determined for CCPP. In March 2007, the MS Office of the State Auditor published an audit of CCDF, “A Review of the Child Care and Development Fund (CCDF) Program in MS”. In it, MS’ OSA took the position that affordable child care for low-income working parents is a “critical element” in their ability to retain employment. This audit found that the child support compliance requirement presented a barrier for working parents seeking child care as a work support. CCDF rules make clear that a primary program goal is to increase the share of eligible parents and children participating in the state certificate program. Yet MS’ child support compliance requirement is a deterrent and a procedural obstacle to child care assistance so needed by single moms. When this requirement went into effect in 2004, MDHS reported that the waiting list for CCDF child care assistance fell from over 10,000 children to 200 children in less than two months. This sharp decline in the state’s CCDF waiting list was not followed by a significant uptick in state-reported CCDF caseload data, meaning the sharp disappearance of children on the CCDF waiting list was NOT due to more children being served.

The range MLICCI estimates takes into account a margin of error and the limitations of the survey sample. Even with limitations, the findings confirm that thousands of parents being served by CCPP providers have been denied CCPP or deterred from applying because of the child support requirement. Extrapolating these results to the larger CCPP universe reveals the potential scale of this issue statewide and the potential impact of reforming this policy.

Mississippi is now 1 of only 17 states that have opted to mandate this requirement in CCPP. A growing number of states that had opted for this requirement subsequently opted to reverse course and eliminate this requirement due to its deterrent and obstructive impact. Most states have never imposed this requirement at all.<sup>ii</sup>

Federal CCPP rules make clear that aligning early childhood programs is key to improving the delivery and continuity of services for low-income families. But from a systems alignment perspective, the child support policy renders aligning CCPP with other early childhood programs, such as Head Start and public pre-K, virtually impossible. Neither Head Start nor public Pre-K in Mississippi impose the child support compliance requirement. A single mom may have her child in Head Start for part-day and seek CCDF assistance for extended day services to cover her work hours. She'll qualify for Head Start without complying with child support, but she won't get the CCPP extended day assistance she needs if she doesn't comply with child support. For a single mom caught up in this maze of policy inconsistencies, affordable child care that covers her work hours will remain out of reach without significant efforts to reform and align CCPP policies.

#### **MLICCI's Previous Surveys Show the Child Support Requirement Has Been Harmful**

Since this requirement went into effect in 2004, MLICCI has surveyed CCPP child care providers in MS. The results of these surveys show an increasing rate of CCPP child care providers reporting that the child support compliance requirement both obstructs and deters eligible parents from applying to CCPP.

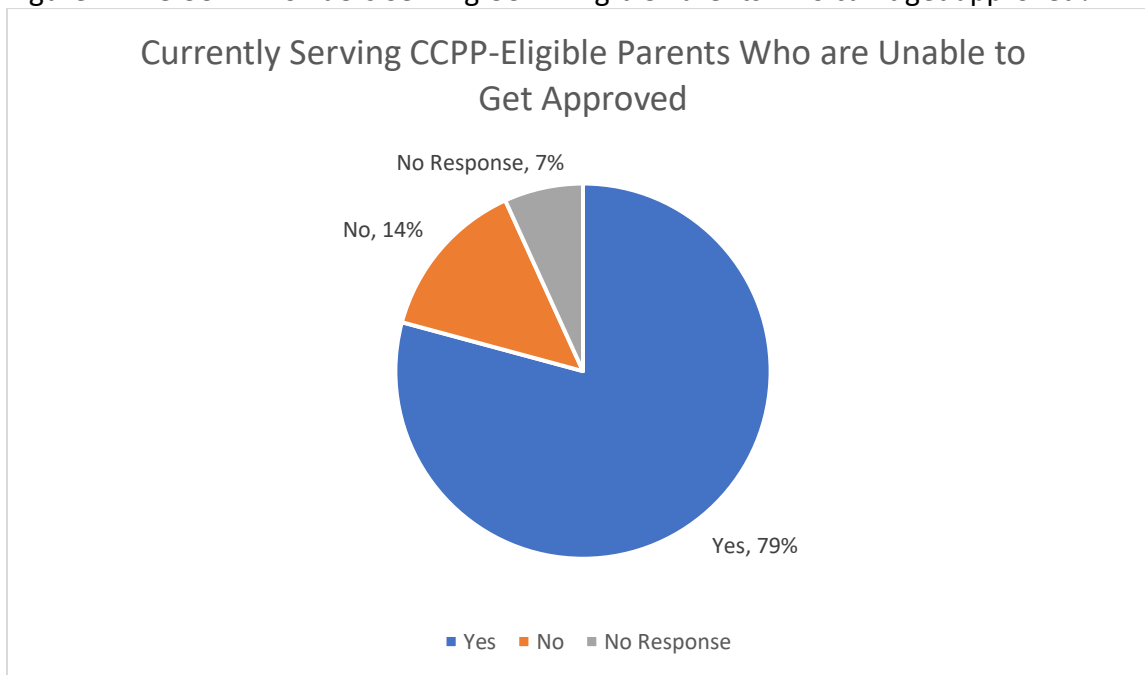
- A 2005 MLICCI survey of 144 child care centers showed that 1,284 children lost their child care certificates when this policy change was implemented, a loss of 40% of the children in the surveyed centers. In 2005, 44% of CCPP providers MLICCI surveyed reported that mothers stopped participating in CCPP when the child support compliance requirement went into effect in 2004, totaling 1,310 mothers in the centers surveyed.
- In 2007, 70% of child care providers reported that mothers they serve have declined to apply for CCPP because they do not want to initiate child support actions against the father.
- In 2010, 74% of surveyed CCDF providers reported that child support was a deterrent for parents applying for CCPP.
- In 2016, 91% of surveyed CCPP providers reported the child support compliance requirement keeps eligible parents from applying for CCPP assistance.

## The CCPP Application Process

The application process for CCPP in Mississippi is online (paper copies can be accepted, but online is the primary method encouraged and used). Parents have to navigate the application process independently, which is documentation-intensive and technology-reliant. Unlike other programs administered by MDHS, county MDHS offices do not handle CCPP applications—they are processed by a centralized state MDHS office. Therefore, parents have no local contacts for CCPP application assistance. CCPP child care providers often help parents they serve navigate the application process. MDHS grants a 60-day period for the application process, including all documents and required information to be submitted electronically and reviewed by MDHS.

Our survey included two structured questions about the general application process: one asked providers if they are currently serving parents who are eligible for CCPP, but are unable to get approved. Another asked if the CCPP application process makes it hard for parents to successfully obtain CCPP.

Figure 1. Are CCPP Providers Serving CCPP-Eligible Parents who can't get approved?



A clear majority of CCPP providers assert they are serving parents who are CCPP-eligible and a majority (62.4%) also say the CCPP application process makes it hard for parents to obtain CCPP.

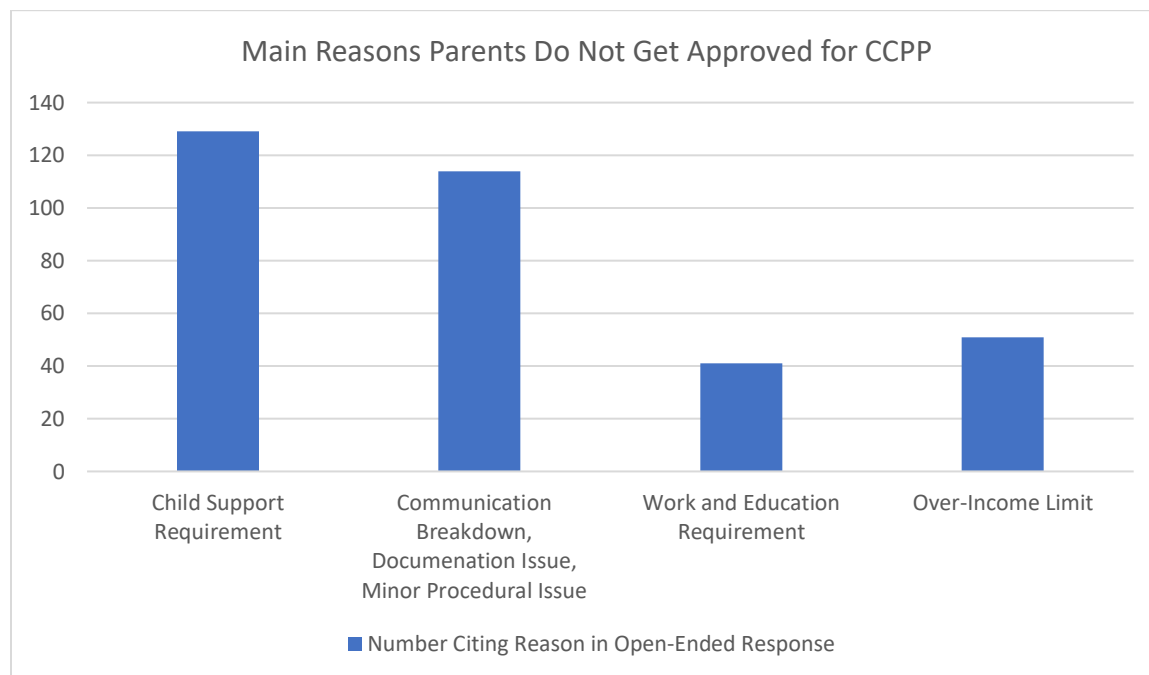
The survey findings reveal significant commonality in response to the questions about the application process itself. While CCPP providers are clear that parents who should be getting approved for CCPP are not getting approved (based on responses to structured survey questions), contextual details provided in responses to the unstructured open-ended question

regarding the main reasons parents do not get approved demonstrate a comparable level of consensus, affirming responses to structured questions.

The survey asked providers for open-ended responses citing the main reasons parents do not get approved for CCPP.

The survey sample included hundreds of open-ended reasons cited by CCPP providers. Overwhelmingly, CCPP providers identified the child support requirement as the primary reason parents they serve don't get approved for CCPP, but other themes also resonated with respondents. The findings show that the application process results in commonly experienced problematic steps and deficiencies that are difficult for both parents and providers. Further, the survey finds these problems in the CCPP application process are rarely ever related to work- and income-eligibility and virtually always related to the child support requirement or a documentation or timeline issue. These issues are reported as difficult to overcome and also difficult to mitigate with the MDHS. MLICCI categorizes this qualitative data into four thematic categories, as illustrated in Figure 2.

Figure 2. State-Imposed Red Tape that Prevents Parental Employment Equity



- **Child Support Requirement**

Parents are denied CCPP due to the requirement or deterred from applying to CCPP. Providers cite this issue as a primary reason parents don't get approved for CCPP.



- **Communication Breakdown, Documentation Issue, Minor Procedural Issue**

In this category, the most common problem that CCPP providers reported is that documentation was sent, but not received or parents are told it was never submitted; that documentation is out of date by the time MDHS reviews it, which results in parents having to re-submit documents and risk not meeting the 60-day application deadline; and that MDHS staff who can help are hard to reach.

Given the CCPP application is online and requires internet access, a number of providers cite technical issues with the online application and website issues, such as information not being saved and documentation uploads failing. Providers commonly reported that emails and messages about missing documents during application and redetermination are not received by parents. Many communication breakdowns are cited throughout the application process: emails and documents are sent and parents/providers are told they are not received by MDHS, getting a representative on the phone is commonly reported as difficult, parents and providers are told paperwork is incorrect, insufficient, or lost/misplaced with inadequate explanations of the issue. Providers report many of these issues also come up during redetermination.

Another commonly reported issue is that parents and providers are told parents must reapply even if they get documents submitted on time (within the 60-day allotted timeframe). If the date of document submission is “too close” to the deadline (or, the 60<sup>th</sup> day from their initial application submission), they must re-apply. For example, providers report that some parents will turn in documents near the end of the 60-day application period, but will be told they are too late for MDHS to review and approve them by the 60<sup>th</sup> day. Many providers report that the length of application approval period is long, daunting, discouraging and unworkable for parents needing child care in the near-term to support work. Providers report constant “phone tag” with CCPP workers, with parents ending up reapplying when they cannot reach anyone and miss the deadline. Providers report that check stubs are not accepted if they are more than 30 days old, but by the time MDHS reviews documents submitted by the parents, the pay stubs are more than 30 days old and are no longer valid, and parents must submit newer documents—this adds to the bureaucratic nightmare parents and providers overwhelmingly experience as the norm.

- **Work and Education Requirement**

In this category, providers report that parents are temporarily unemployed and need child care to find work. Many experience changes in work hours or earnings that are temporary but result in the loss of CCPP rather than a job search period granted by CCPP. Some parents’ hours are decreased due to COVID-19. Students have trouble meeting the required work hours if splitting the work requirement with their education/training attendance.

- **Over-Income**

In this category, parents' earnings are reported as too much to qualify for CCPP. Many providers report while parents cite this issue, their earnings are also too little to afford child care.

### ***CCPP Provider Experiences with the Application Process***

Below are selected examples from open-ended responses that speak to these commonly-cited issues.

For instance, one provider captures one of the most commonly experienced issues related to the potential pitfall of submitting required information, documentation upload issues and the lack of constructive communication about what is needed to successfully process applications:

“I’m told supporting materials are missing when I know I uploaded them. After submission parents think everything is fine only to learn they’re terminated; Then they have to start all over.”

One CCPP provider describes the length of application review and approval and the challenge of getting in touch with someone within MDHS who can help, and the necessity of being an advocate for their parents' pending CCPP applications:

“When I call for verification I'm told they're in review. Some applications have been there almost 60 days. When I called and reported applications had been waiting 60 days, I got 2 approved over the phone and she could only look at 3 because she had other calls to return. I called again, asked for a supervisor and got no return call.”

One CCPP provider speaks to the multiple issues they face in the process of helping parents apply for CCPP:

“Some parents don't have funds to pay without help. Most parents don't want to accumulate fees while waiting on CCPP. It takes WEEKS to hear back. 3-5 parents were told to start over. No one contacted them – just a generic email or phone recording. Shirking duties to process applications. My biggest complaint is that Jackson staff is not taking responsibility. We no longer have a contact person to answer us. Parents are being told that funding is an issue or that their file is not found or that no one is available to work their file. One family was told her file was acknowledged but there was no one available to process it and when it was processed, it was not dated the date stamped received by CCPP but weeks later when staff was available to finalize it. Problem with portal not allowing parents to complete the file, etc.”

The problem of documents being valid at the time of submission and invalid after 30 days due to the agency's date of review, not to the parent's failure to submit current documents, is also discussed by this provider:

“Jackson office saying they didn't receive documents or parents didn't complete them and no one is available to process the application, yet approval wasn't backdated to completion but dated when staff were available to work and process the file.”

One respondent asserted they actively must help prove to MDHS that parents have submitted documents:

“They [parents] are told that documents weren't submitted. Now I assist in submitting documents to provide proof of submission.”

Together, the most salient findings from the survey and the extent to which these issues were so commonly expressed and affirmed in open-ended comments calls for significant reforms in the application process and reveals the extensive bureaucratic red tape that prevents parents from accessing CCPP, which results in parents’ inability to seek, obtain and remain employed.

## **Redetermination**

The child support requirement issue and the myriad bureaucratic process issues discussed in the previous section also affect parents’ CCPP redetermination process.

Federal rules require states to grant minimum eligibility periods of 12-months. During CCPP redetermination, parents are granted a time limited period to submit documentation to be reviewed by MDHS. The same issues experienced during the CCPP application process are experienced during the redetermination process. During redetermination, parents are required to submit new information regarding employment, income, proof of residence and proof of child support cooperation.

The survey included one structured question asking CCPP providers if they had lost parents in their centers during recent redeterminations. MLICCI asked respondents to provide data quantifying the number of parents their center has lost as a result of recent CCPP redeterminations.

Seventy-four percent of CCPP providers reported parents losing CCPP during recent redeterminations. On average, CCPP providers reported losing 6 parents during recent redetermination. If we assume 74% of CCPP providers statewide experience what the average survey respondent reports, MLICCI estimates that 3,600 – 4,100 parents have likely lost CCPP during recent redetermination, leaving potentially 6,400 – 7,300 children disconnected from child care.<sup>iii</sup>

Providers’ responses to questions about CCPP redetermination were affirmed in their open-ended comments. Some providers describe the crux of the issue getting parents through the redetermination process and the loss of children experienced as a result.

“...lots of parents are cut off during redetermination because of incomplete applications. They receive letters they have to reapply. The center lost 17 children the last of December and 14 more within the last 2 months”

“CCPP loses documents all the time; I had 15 parents lose their certificates in the last 2 months”

“Parents send in paperwork. They say they don't get it. By that time parents are denied. Parents get off at 4 or 5, DHS is closed by then. Parents can't afford to take off to go to DHS. At redetermination they shouldn't have to turn all that in again. All CCPP needs is proof of residence and check stubs.”

Just from the survey sample, providers reported nearly 1,000 parents losing CCPP during recent redeterminations—this number reflects actual figures reported by respondents. The broader universe estimates take into account a margin of error and the limitations of the survey sample. Notwithstanding such limitations, however, the findings confirm that potentially thousands of parents have lost CCPP during recent redeterminations.

## **Waiting Lists**

The survey included structured and open-ended questions about centers' waiting lists. One asked if center's have a current waiting list, one asked those with a current waiting list to provide a number of parents on the waiting list and one asked if parents on the center's waiting list are eligible for CCPP. The survey also included an open-ended question asking providers to cite the main reasons parents are on their center's waiting lists.

There has long been a “waiting list” of parents in Mississippi who need CCPP but who can't get it. In the past, the MDHS has maintained its own waiting list, which it has historically defined as parents who are potentially eligible and waiting on CCPP funding to become available. CCPP funding has historically been inadequate to serve all who qualify for CCPP, so MDHS maintained an official waiting list (sometimes called the “pending funding list”) for many years.

In recent years, and particularly with the unprecedented infusion of additional federal child care funds as a result of the American Rescue Plan Act (ARPA) and COVID-19, Mississippi reports that it has no waiting list and that funding is available for those who wish to apply.

Whether or not MDHS maintains an agency-level waiting list based on funding availability, in reality, CCPP child care centers constantly maintain and accrue waiting lists of their own comprised of parents who need child care services and who want to enroll their children, but who are unable to for various reasons, but primarily because they cannot afford the high cost of child care.

Most providers in the sample reported having a waiting list of parents (56.4%). Those providers reporting a current waiting list provided data showing an average of 15 parents. If we assume that 56.4% of CCPP providers in the larger CCPP universe experience what the average survey respondent reports with regard to their current waiting list of parents, between 6,700 – 8,100 parents are potentially on CCPP provider waiting lists throughout the state of Mississippi. Extending this estimate beyond parents, MLICCI estimates 11,800 – 14,200 children are prevented from accessing child care due to parents being on the waiting list.<sup>iv</sup> Just in MLICCI's sample, providers reported 1,791 parents currently on waiting lists—this number reflects actual figures reported by respondents and on its own is significant. The broader universe estimates take into account a margin of error and the limitations of the survey sample. Notwithstanding

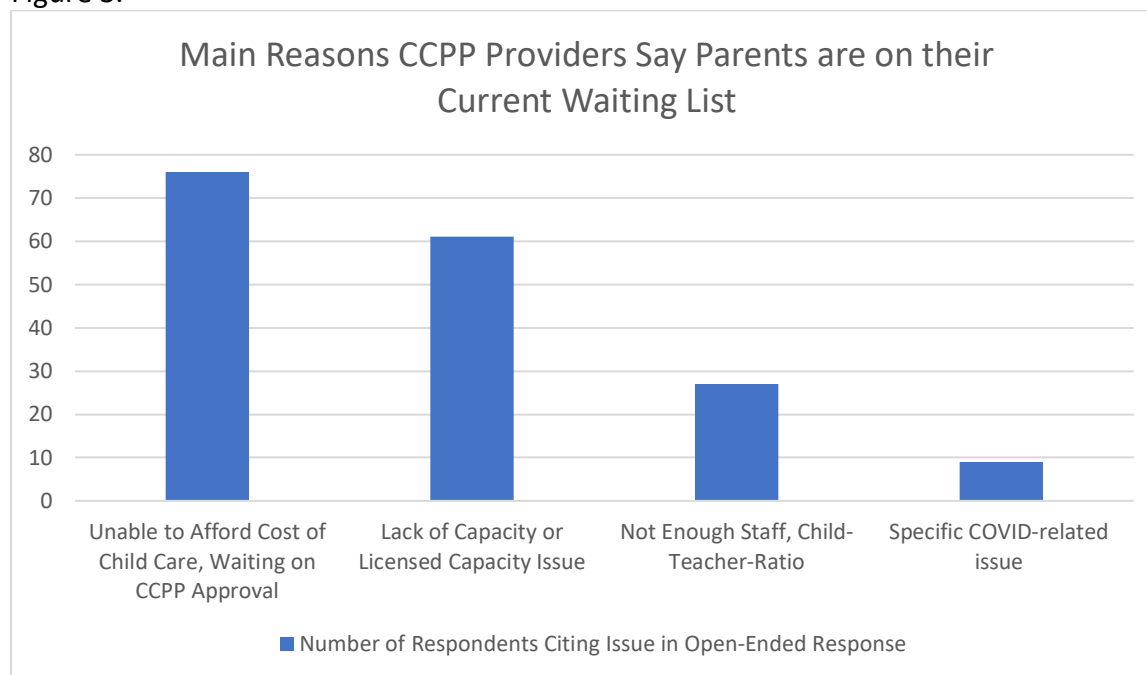
such limitations, however, the findings confirm that CCPP centers have waiting lists of parents who need and are likely eligible for CCPP.

MLICCI received hundreds of open-ended responses from CCPP providers regarding reasons parents are placed on their waiting lists. From responses to the structured questions, we know that parents on waiting lists are eligible for CCPP. Responses to the open-ended question reveal the most commonly cited reason parents are on providers' waiting lists is the high cost of child care and waiting on CCPP to be approved. Other themes also emerged as to why centers have parents on waiting lists.

### Main Reasons Parents Are On CCPP Provider Waiting Lists

- Affordability of child care and CCPP Issues
- Lack of capacity, lack of classroom space for young age groups, change in licensed capacity
- Staffing level issues, Child-Teacher Ratio Issues
- COVID-19-Specific Issue for Provider and/or Parent

Figure 3.



Some providers made comments in open-ended responses that illustrate the primary reasons parents on their waiting lists can't access child care:

“[parents] can't pay a normal rate without a voucher. [Parents] cannot get a voucher for various reasons; Not uploading info they [MDHS] say they didn't get”

“Parents are waiting for approval of [CCPP] certificate; If they don't get it they can't afford to pay”

“We have some on the waiting list just waiting on their child care certificate approval. The guidelines are not making it easy to be approved”

While CCPP providers cited the fact that parents could not afford the cost of child care as the primary reason parents are on their waiting list, other reasons were also cited. Some providers reported a lack of capacity or classroom space for certain age groups and staffing issues – some of these issues are related to impacts of COVID-19, such as smaller child-teacher-ratios (i.e. need more teachers for fewer kids), changes in capacity due to social distancing or gathering requirements or changes in licensed capacity.

Most commonly, however, the survey collected open-ended responses that spoke to the need for CCPP approval and the fact that parents are in a holding pattern until they can afford the high cost of child care.

### **CCPP Providers: Use COVID-19 Child Care Money to Increase the Number of Children Served**

In recent months, MDHS has expressed publicly the concern that building up capacity in CCPP centers and expanding the number of children receiving CCPP vouchers is a sustainability concern. The stated concern is that child care providers will be strained rather than supported if they take on more parents receiving CCPP during the temporary three-year period that states will have additional COVID-19 ARPA child care funds.

As one CCPP provider respondent commented with regard to the parents she serves: “they desperately need childcare”.

The survey finds 92% of CCPP providers in Mississippi want COVID-19 child care funds to be used to serve more children in CCPP.

These survey results challenge the idea that CCPP providers are concerned about sustainability and taking on too many new parents – they are not. In fact, the opposite is true. CCPP providers are concerned about not having enough parents receiving CCPP and how current problems in the program threaten the financial viability of their centers by keeping so many parents disconnected from CCPP. Access and retention of CCPP, not funding sustainability, is the primary concern expressed by CCPP providers.

The survey strongly reveals the real sustainability issue for parents and providers are the deeply entrenched and commonly experienced problems related to the CCPP child support requirement and to the CCPP application and redetermination process.

These are the issues that prevent CCPP from being sustainable for parents and providers in the current system.

Resoundingly, CCPP providers across the state of Mississippi want more parents to be served by CCPP and equate fewer parents receiving CCPP as having a negative impact on their center's business. CCPP providers want reforms in CCPP rules and processes so that CCPP as a support service is more stable and sustainable for the parent, which in turn will make the CCPP center's revenue more sustainable and stable.

## Conclusion

MLICCI, therefore, recommends that MDHS do the following:

**Simplify the application and redetermination process by removing red tape that providers and parents report as common, recurring and preventable.** The state-designed application and redetermination process and state policy choices result in commonly experienced problems that providers describe as unworkable, lacking in reciprocal communication, rigid, punitive and result in the denial or loss of CCPP.

**Remove the Child Support Cooperation Policy from Child Care Payment Program (CCPP) eligibility requirements.** The state-imposed child support requirement is overwhelmingly experienced as obstructive, harmful to parents' efforts to obtain CCPP assistance and the **primary reason** parents they serve can't access CCPP.

**Increase the number of parents receiving CCPP.** Issues in the application and redetermination process result in centers reporting waiting lists of CCPP-eligible parents who need child care. Focusing additional federal ARPA funds on existing center's waiting lists and unmet child care needs would exhaust the additional ARPA child care funds Mississippi will receive. Using MLICCI's low-end estimate of the number of children on CCPP center's waiting lists statewide (11,800), Mississippi would exhaust all of its \$200,000,000 in ARPA funds just serving this group for three years.

While ARPA funds present a rare opportunity, this survey strongly supports a focus on Mississippi's existing CCPP centers and parents currently on their waiting lists or who are enrolled already and need CCPP to afford child care, or who lost CCPP assistance during redetermination.

Serving more parents in CCPP doesn't require an information campaign or services targeted to new and different parents in Mississippi. Serving more parents in CCPP requires the state and MDHS to respond to the current primary reasons so many parents and children remain locked out of CCPP and to reform policies and processes that are shown to be the true culprit of CCPP serving far fewer parents than it can and should.

## Endnotes

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<sup>i</sup> To estimate the number of parents denied CCPP or deterred from applying in the larger CCPP universe, MLICCI uses the average number of parents, as reported in open-ended response as numerical data by respondents,

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multiplied by the number of providers reporting a loss. 73% and 83% of providers responded that the requirement results in application denials or deters parents from applying, respectively, and an average of nine known parents being served have failed to access or retain CCPP due to the rule. MLICCI uses 75% as the rate reporting a CCPP loss or application deterrence for purposes of calculating an estimate within the larger CCPP universe. To arrive at an estimate that takes into account the limitations of the survey sample size, we find at the 95% Confidence Level, the sample's Margin of Error is 5.24%. We applied this margin of error to the affirmative response rate in this calculation (75%), deriving a numerical range of CCPP centers in the larger, statewide universe that are likely to respond in the affirmative and likely to report a similar level of CCPP loss or application deterrence due to the CSE requirement. We multiplied the upper and lower limit of this range by the average number of parents experiencing CCPP loss or deterrence due to the requirement. This calculation yielded an estimated range of 612 – 703 CCPP centers and 5,508 – 6,327 parents. Because the estimate considers parents, there are necessarily children of those parents who are also negatively impacted when CCPP is lost or inaccessible. MLICCI also extended this estimate to children. MLICCI uses the most recent data (FY2019) available from federal sources on the average number of children and families served in CCPP in Mississippi. Showing 20,900 children and 11,900 families most recently, MLICCI uses the average number of children per average number of families as a multiplier to estimate the number of children also affected by the CSE requirement. The family size multiplier MLICCI uses is 1.76. See, <https://www.acf.hhs.gov/occ/data/fy-2019-preliminary-data-table-1>. The range of children estimated based on the survey response is 9,694 – 11,135.

<sup>ii</sup> This information can be found via The Child Care and Development Fund Policies Database, <https://ccdf.urban.org/>. Also see, *Mathematica (2018)*, <https://mathematica.org/publications/child-support-cooperation-requirements-in-child-care-subsidy-programs-and-snap-key-policy>.

<sup>iii</sup> To estimate the number of parents losing CCPP during recent redetermination in the larger CCPP universe, MLICCI uses the average number of parents losing CCPP as reported in open-ended response in the format of numerical data by respondents (6 parents on average), multiplied by the number of providers reporting parents lost in recent redetermination (74%). MLICCI applies the sample's general margin of error (5.24%) at the 95% confidence level to this rate to derive an estimated range of providers in the larger CCPP universe that would likely respond in the affirmative. This calculation yielded an estimated range of 603 – 695 CCPP centers and 3,618 – 4,170 parents. Because the estimate considers parents, there are necessarily children of those parents who are also negatively impacted when CCPP is lost during redetermination. MLICCI also extended this estimate to children. MLICCI uses the most recent data (FY2019) available from federal sources on the average number of children and families served in CCPP in Mississippi. Showing 20,900 children and 11,900 families most recently, MLICCI uses the average number of children per average number of families as a multiplier to estimate the number of children also affected by the CSE requirement. The family size multiplier MLICCI uses is 1.76. See, <https://www.acf.hhs.gov/occ/data/fy-2019-preliminary-data-table-1>. The range of children estimated based on the survey response is 6,368 – 7,339.

<sup>iv</sup> To estimate the number of parents on CCPP centers' waiting lists in the larger CCPP universe, MLICCI uses the average number of parents on waiting lists as reported in open-ended response in the format of numerical data by respondents (15 parents on average), multiplied by the number of providers reporting waiting lists (56.4%). MLICCI applies the sample's general margin of error at the 95% confidence level (5.24%) to this rate to derive an estimated range of providers in the larger CCPP universe that would likely respond in the affirmative to having a current waiting list of parents. This calculation yielded an estimated range of 449 – 541 CCPP centers and 6,735 – 8,115 parents. Because the estimate considers parents, there are necessarily children of those parents who are also negatively impacted when parents are on waiting lists and cannot access CCPP. MLICCI also extended this estimate to children. MLICCI uses the most recent data (FY2019) available from federal sources on the average number of children and families served in CCPP in Mississippi. Showing 20,900 children and 11,900 families most recently, MLICCI uses the average number of children per average number of families as a multiplier to estimate the number of children also affected by the CSE requirement. The family size multiplier MLICCI uses is 1.76. See, <https://www.acf.hhs.gov/occ/data/fy-2019-preliminary-data-table-1>. The range of children estimated based on the survey response is 11,853 – 14,282.