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2017 CHILD CARE POLICY TOWN HALL SERIES SUMMARY



MLICCI's summer 2017 town hall sessions included the cities of Jackson, Cleveland, McComb, Macon, Gulfport and Greenville and reached approximately 300 providers, parents and child care stakeholders.

In this report, we summarize feedback collected throughout the series of meetings and offer recommendations based on that information.



MLICCI 2017 CHILD CARE POLICY TOWN HALL SERIES SUMMARY

In June 2017, the Mississippi Low-Income Child Care Initiative (MLICCI) held a public town hall-style meeting to provide information about changes in the Child Care Payment Program (CCPP) to participating parents and providers and to document their feedback about these changes. CCPP assistance is designed to provide child care as a work support to parents in low-wage jobs. MLICCI hosted representatives from the Mississippi Department of Human Services (MDHS), who delivered a presentation on CCPP changes regarding parental and provider redetermination. MDHS also provided answers to participant questions. In an effort to inform and document feedback from as many participating parents and providers from across the state as possible, MLICCI partnered with the Mississippi Legislative Black Caucus to co-host a series of town hall-style sessions across the state during the months of August and September 2017.

Where'd we go?

Jackson, Cleveland, McComb, Macon, Gulfport and Greenville and reached approximately 300 providers, parents and child care stakeholders.

Policy changes currently underway in the CCPP are a result of new federal requirements that provide broad guidelines and states are tasked with creating detailed policies to implement the new regulations. A number of simultaneous policy changes are occurring in Mississippi's child care assistance program. In response to new federal requirements in the Child Care Development Fund, which funds the CCPP, the state has implemented new health & safety training requirements that all providers must complete. The state has also eliminated its previous voluntary system of "quality improvement" and opted to implement a new mandatory system of "quality improvement."

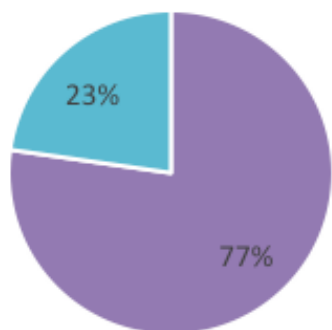
All licensed child care providers participating in CCPP are now undergoing an application process to become a Standard Child Care Center under this new system and a technical assistance process with the newly established Early Childhood Academies (ECAs). Additionally, MDHS is under federal corrective action for not conducting annual parental redeterminations for CCPP assistance. Therefore, all current CCPP participants are undergoing a redetermination process, which is different from the previous process that parents and providers were accustomed.

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Providers Losing Parents as a Result of CCPP Termination

- Losing Parents from CCPP who still qualify
- Not Losing Parents who still qualify



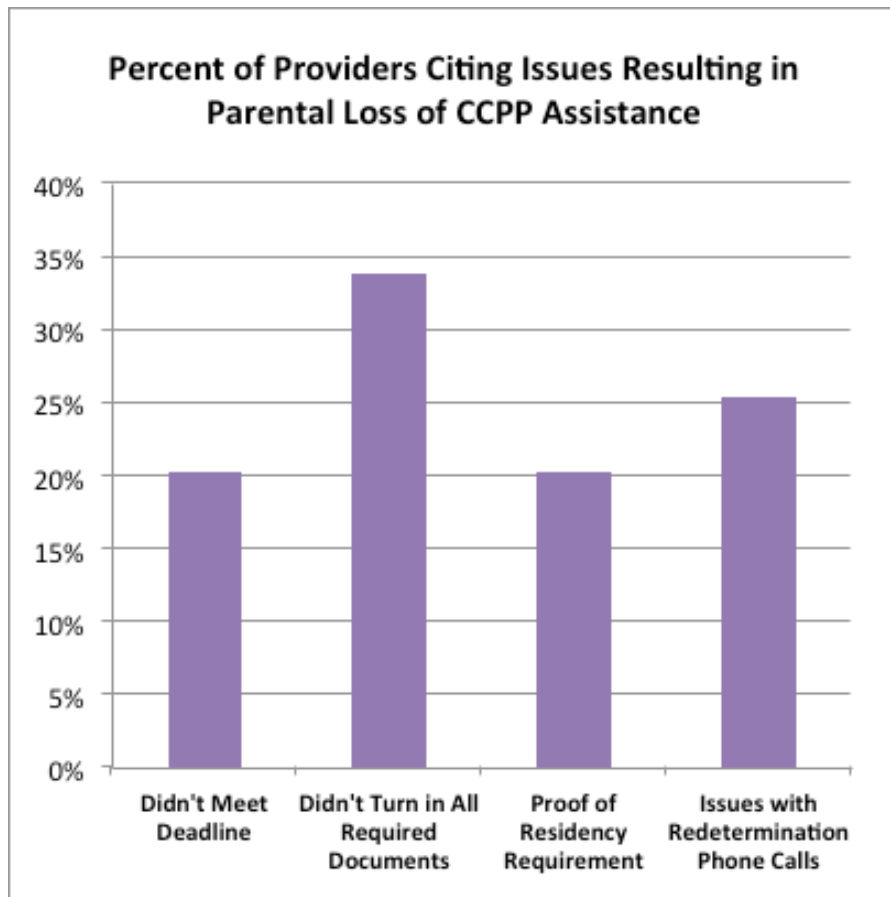
Feedback from Child Care Payment Program Participants

Parents and providers offered substantial feedback regarding current changes being implemented in the Child Care Payment Program. MLICCI collected feedback through surveys and through documenting provider and parent input at each meeting. In the following, we summarize the issues discussed. Licensed child care providers participating in the CCPP represented the majority of participants at each town hall session.

At each session, providers were asked whether or not working parents who are losing assistance are still eligible for CCPP

assistance, and if so, what are the main reasons working parents they serve are failing to make it through the redetermination process and losing child care assistance and generally what their greatest concerns are regarding current changes in the CCPP.

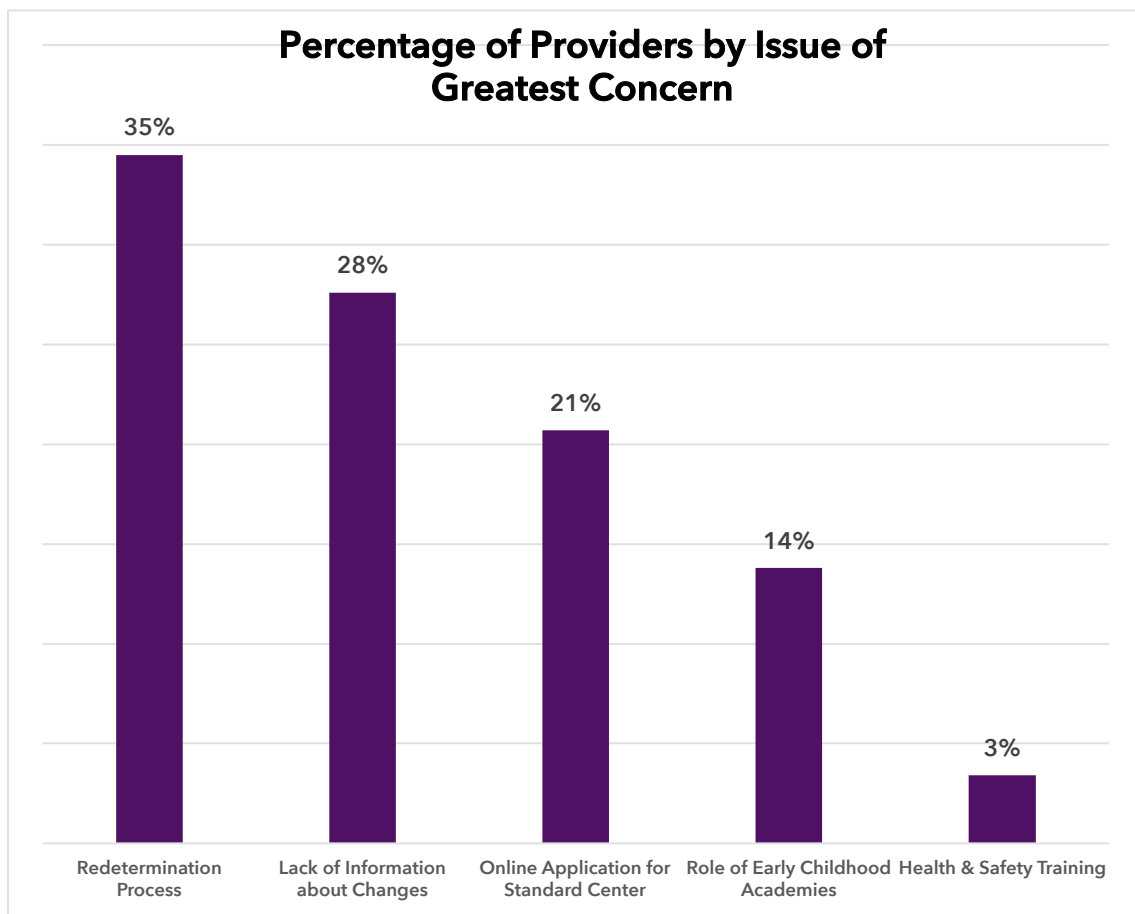
The vast majority, or 77%, of providers at these sessions indicated that parents who are losing CCPP eligibility are still working and still eligible for benefits.



Providers reported that the main reasons their parents are losing CCPP assistance are related to not meeting a deadline for required documents, not complying with the Proof of Residency requirement and issues receiving phone calls about their CCPP status. Well over 6 in 10 (62.5%) providers indicated that each of the following factors represent their greatest concerns regarding the Child Care Payment Program:

- Health & Safety Training
- Online Application for Standard Center
- Redetermination Process
- Lack of Information About Changes
- The Role of the Early Childhood Academies

Providers also prioritized their concern over these issues. Most providers prioritized (chart to the right) the current parental redetermination process and providers' lack of detailed information about the changes and what to expect under the new system as the greatest concerns about CCPP.



Providers are least concerned about newly required health and safety training.

Eligibility Redetermination Issues

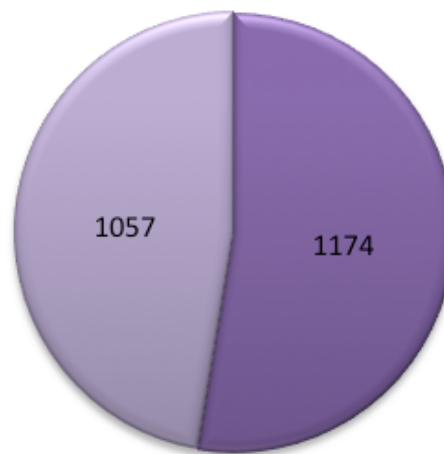
Throughout the series of town hall sessions across the state, providers and parents consistently registered several issues: confusion regarding a contact information verification phone call, difficulty complying with the newly implemented proof of residency requirement, confusion regarding deadlines for turning in all required documents and confusion regarding notice.

MDHS confirmed in its [August 2017 CCPP newsletter](#) that the state is under federal corrective action for not conducting annual parental redeterminations.

Mississippi State Senator Derrick Simmons, following a town hall MLICCI held in partnership with the Black Caucus, obtained data from MDHS regarding parental redetermination for CCPP assistance. MLICCI analyzed this data.

As of September 13, 2017, 47.8% of the 4,669 parents who are being re-determined for CCPP eligibility have been through the process. Of these 2,231 parents who have undergone the redetermination process, 52.6% have been approved and 47.4% (1,057) have been terminated from the program. When a low-income single mom loses her child care assistance, she is typically forced to quit work.

Parents Who Have Been Redetermined For CCPP Eligibility as of September 13, 2017



■ Remained Eligible ■ Terminated from CCPP

Providers and parents reported confusion regarding an initial step in the new redetermination process in which a parent would be contacted via phone to verify their contact information ahead of or as 60-day notices were being disseminated. While this step is not defined in the CCPP Policy Manual, it is a process that MDHS has publicly discussed.

In some cases, parents reported that phone calls occurred at their place of employment in which they are unable to take calls. Providers consistently reported that parents' numbers frequently change. Parents and providers reported confusion over this step and uncertainty over how this phone call affected their redetermination process.

Providers and parents consistently reported difficulty complying with the new "Proof of Residency" requirement in the redetermination process. At MLICCI's June 29th town hall, MDHS officials confirmed that this requirement was being implemented for the first time in the current parental redetermination process that began in February 2017. This policy requires an applicant or current recipient of CCPP assistance to provide a state-issued ID or driver's license in addition to two documents (such as utility bills) that must each corroborate the address provided in the application for CCPP assistance. Low-income parents and providers serving those parents reported frequent address changes and the reality that many parents possess valid IDs with a previous address that does not match their current address. Some recipients are in temporary housing arrangements with friends or relatives. Low-income parents in these circumstances report having to take time off of work to comply with this requirement. MLICCI contends this requirement is at odds with federal guidance holding that eligibility policies should not cause an "undue burden" on low-income working parents.

A number of parents and providers serving them reported confusion regarding deadlines for turning in required documents and generally confusion regarding notice. In the current redetermination period, all parents were required to turn in all documents, such as long-form birth certificates, as if applying for the first time. Some parents and providers reported confusion over which documents were required and as a result, parents submitted documentation required in previous redeterminations for CCPP assistance, such as pay stubs, while omitting other newly required documents that they provided when initially determined eligible for benefits. This confusion led to some parents failing to meet deadlines and losing CCPP assistance.

Providers reported not receiving the parents' notice of redetermination until 30 days before the deadline for all required steps. Parents receive 60- and 30-day notices. Providers at multiple sessions expressed the need to also receive 60-day notices of CCPP redetermination to have more time to assist parents in completing requirements. Providers and parents also reported that a number of parents would begin the process on the latter end of their 60-day redetermination period unaware of the additional new steps and were unable to complete them all before the end of this period, leading to their termination.

General confusion about notice for redetermination was also reported. One parent described a scenario in which she received two separate notices about her CCPP status. She misinterpreted one notice as saying she no longer was CCPP eligible and the other as saying she could apply again after 60 days, when in fact she was receiving her 60-day notice and other material explaining redetermination. Thinking her child care was cut off and unable to get clarity from her provider or MDHS, this single mom quit her job for the summer months of 2017 and when she reapplied to CCPP, she was placed on the Pending Funding list with no indication her child care assistance would be reinstated any time soon. She attended the session in hopes of getting reinstated, but unfortunately it was too late and this parent's economic security has been weakened.

A number of low-income working parents who were terminated from CCPP reached out to MLICCI with their experiences. Below are brief excerpts of these mothers' experiences:

I went to the website and tried to apply. My childcare case is closing. I emailed someone about it and asked them what I need to do! It said I must be working 25 hours or more a week or going to school and have an open child support case. I work 40 hours a week and I have an open child support case.

I need help with child care. I am a working mother of three who was taken off childcare

I have three kids. A single mother. I receive no child support for my three kids and I work full time at Wal-Mart. Been on this program for my daycare for three years now. Because something about a renewal button we didn't hit I was thrown off this program. Now I can't afford daycare for my kids so now I will have to quit my job to take care of my kids alone. I make \$10.91 hour, work 35 hours a week.

I had received an email from my child care provider about redetermination after my child care was just terminated cause they say I didn't have my hours on my letter from work and it didn't get there in time.

Data MLICCI analyzed provided by MDHS does not provide reasons for CCPP terminations. MLICCI contends that a termination rate of nearly 47% of those who have actually gone through the process, based on data from September 2017, could be mitigated by adjusting policy to respond to the issues providers and parents report on as causing many terminations, particularly since termination of child care often means loss of employment, which is antithetical to CCPP's core purpose of supporting low-income parents' ability to work.

Health & Safety Training Availability

At MLICCI's June 29th statewide town hall meeting, providers from across the state reported difficulty logistically and financially in complying with new federal health & safety training requirements. At the time of this meeting, quarterly in-person mass training events were made available to providers through MDHS. This training was typically available on Saturdays, requiring additional overhead and difficulty in ensuring all new employees met the deadline within 90 days of hiring. In response, MDHS indicated at the June 29th session that they would consider an online training option.

MLICCI was happy to report to providers and parents through August and September sessions that MDHS announced in early August that online health and safety training would be available and that MDHS would still offer in-person trainings through the Early Childhood Academies.

Reimbursement Rate

Providers at multiple sessions reported that reimbursement rates for child care certificates need to be raised to reflect market rates. Additionally, providers insisted that MDHS must take into account CCPP-participating parents' continued employment in low-wage work and the reality that providers serving low-income parents often suppress their rates to continue serving their community. MDHS consistently reported at town hall meetings that reimbursement rates would be raised based on the new Market Rate Survey, but the time frame for that increase has not been set. MDHS has recently reported reimbursement rates will go up after the current process of parental redetermination is concluded, which may be by the end of 2017, but no indication of the percentage increase has been offered.

Limited Supply of New Vouchers and Limited Reach of CCPP Funding

A significant number of providers reported that although many of the parents they serve are eligible for CCPP assistance, many have been on the state's Pending Funding list for three or more years. MDHS officials stated during the town hall series that with exception of Referred Clients, the agency has issued no new vouchers for CCPP child care since December 2014. This is nearly consistent with data provided by MDHS that MLICCI analyzed showing only 17% of 5,776 newly approved recipients between December 2014 – August 2017 were parents who are working or attending school at the 50th or 85th percentile of state median income. The majority of newly approved parents during this period were Referred Clients (TANF, TCC, homeless, healthy homes MS, foster or protective custody).

Providers consistently reported that funding for CCPP prevents the program from reaching many low-income mothers who qualify. MDHS reported that funding for the program is limited and prevents them from significantly decreasing the Pending Funding list. Parents who are placed on the Pending Funding list are not Referred Clients and are typically single mothers who are working, attending school or both, and whose income is below 85% of the state median.

MDHS confirmed that even if funds are available, the agency opts to reserve funds to ensure child care can be available for Referred Clients, which MDHS has prioritized as a recipient group. The reality of this limited reach of CCPP assistance was best captured by a mother who reached out to MLICCI:

I have applied for childcare for 4 years now and been denied. It's hard being a working mom trying to maintain bills and daycare expense so I have to beg someone to watch them or missing days off work where soon or later I'm going to be fired so please if it's possible for me to receive child care I would be greatly thankful.

TANF Client Issues and Transitional Child Care Issues

At multiple sessions throughout the state, we heard from providers and parents about issues with child care assistance for parents referred to CCPP through the Temporary Assistance for Needy Families (TANF) program. Some providers reported serving parents on TANF who had not ever received a referral from their case worker for CCPP assistance, leading to that parent having difficulty complying with the TANF work requirement and affording child care.

Providers consistently reported that recipients of both TANF and Transitional Child Care (TCC) receiving CCPP assistance also need pathways to higher-paying jobs, such as direct referrals or financial assistance for education or training. While TANF and TCC clients are given priority for child care assistance, once their eligibility for those programs is no longer valid, their child care assistance is also automatically stripped regardless of their income or employment at the time. As one child care provider who has served low-income women for decades put it,

I have parents who try to apply to the TANF work program, then they have to do a job search before they get approved and then they find the job they already had, working for \$7.25 an hour, and so then they don't get on TANF because they're working but they are put in Transitional Child Care for 24 months, which is good, but at the end of that 24 months, they still have that minimum wage job and then they automatically lose the child care and they're back where they started

Access and Role of Early Childhood Academies

A number of providers expressed confusion over the role that Early Childhood Academies (ECAs) would play in determining child care centers eligible for CCPP participation. Over the course of town hall meetings, MDHS acknowledged that details regarding the new system are not yet finalized. MDHS officials confirmed through the series of town hall meetings that provider participation in technical assistance offered through ECAs is voluntary, that ECAs will not monitor centers and that ECAs will not assess environmental factors and issue “clipboard rankings” as part of evaluations (unlike the state’s previous quality improvement system). The role of ECAs is to provide technical assistance and to offer services that are accessible to all licensed providers seeking to be CCPP-approved.

Standard Center Application

One of the biggest concerns providers have is the lack of information about the array of changes for both providers and parents participating in the CCPP. Providers who wish to remain in the CCPP are now being asked to complete a newly created application that will assess that provider’s licensing status, but also will seek information about its Early Learning Curriculum and its capacity to conduct personnel assessments. Over the course of MLICCI town hall sessions, MDHS clarified that providers would not be “graded” based on their application responses. Rather, responses in the Standard Center application will allow MDHS and the ECAs to determine what quality improvements will be necessary for a provider to be “federally compliant” and to be eligible for continued CCPP participation.

Many of these details are unclear because MDHS has opted to not detail procedures regarding this new process in the CCPP Policy Manual. Instead, the current CCPP Policy Manual merely references a plan recently adopted by the State Early Childhood Advisory Council (SECAC), *A Family-Based Unified and Integrated Early Childhood System*. However, this plan does not yet include comprehensive procedural details. For instance, MDHS recently confirmed in its August 2017 CCPP newsletter that child care centers submitting their application to become a Standard Center who are identified as having an area that will need improvement under the new system will be granted “conditional approval.” However, the status of “conditional approval” and the specific procedures, including a timeline detailing how a provider moves beyond this status, is not described in any document that is currently accessible to child care providers. This lack of clarity leaves child care providers unable to clearly understand what is expected of them under the new CCPP rules.

Confusion Over Education Requirements

Providers, including both child care center directors and staff, reported confusion over education requirements under the new system of “quality improvement”, in which licensed centers are applying to become Standard Centers. Several providers reported that they had been informed that new rules would require all of them to have higher education. As a result, workers in some areas have enrolled in classes and are paying for these expenses out of pocket. While educational attainment is welcome, child care workers in some areas are in crisis mode, worried they will be fired if they are not enrolled in school, and taking on unplanned expenses that threaten to diminish their economic security.

Recommendations

Eligibility policy changes always result in a portion of still-eligible participants falling through the cracks. Single moms who lose CCPP assistance are typically forced to quit work because they can no longer afford child care. In the case of current CCPP changes for parents, more than 1,000 are being forced to choose between the child they love and the job they need. MLICCI firmly believes this is not a choice we should force upon low-income working Mississippians. Because child care centers have just begun the process of applying to become Standard Centers, we are not yet sure how many will lose their CCPP eligibility. Below, we offer recommendations based on interactions with hundreds of providers and parents to improve outcomes under the new system.

- ◆ Increase CCPP funding so more children of low-income working parents can be served and removed from the Pending Funding list. This can be done by directing more federal and state funds to CCPP and identifying other programs where more money can be directed to CCPP
- ◆ Determine reasons for termination for the 47% of parents terminated thus far to assess whether or not issues are consistent and could be addressed through broad policy change for future rounds of applicants
- ◆ Eliminate the Proof of Residency requirement
- ◆ Grant parents a grace period beyond their 60-day redetermination deadline to get all required documents turned in **if** they initiate the redetermination process prior to the end of the notice period
- ◆ Contact providers, in addition to parents, to verify parental contact information
- ◆ Include CCPP-approved providers in 60-day parental redetermination notices in addition to their inclusion in 30-day notices

Recommendations continued

- ◆ Link parents being re-determined in addition to TANF and TCC Referred Clients to workforce training leading to higher-paying wages and provide child care assistance while they complete training or education
- ◆ Raise the certificate reimbursement rate for providers serving low-income working parents
- ◆ Prioritize non-Referred Clients, or low-income parents who are working or attending training or school, for more CCPP funding to reduce the Pending Funding list
- ◆ Do not cut TCC parents' child care at the end of their eligibility period if their earnings have not increased to a level that enables them to afford child care expenses
- ◆ Create and incorporate procedural details of the new requirements for CCPP-approved providers seeking to become Standard Centers in the CCPP Policy Manual
- ◆ Clarify what new educational requirements, if any, are required of child care providers under the new system and develop informational packets for dissemination to centers



THE MISSISSIPPI LOW-INCOME CHILD CARE INITIATIVE

Mississippi Low-Income Child Care Initiative improves the child care assistance program serving low-income working parents and strengthens the financial viability of the child care centers that serve them, so that no mother has to choose between the job she needs and the child she loves.

Since 1998, MLICC has been a champion for affordable child care for Mississippi's low-income working parents.

Child care is expensive – sometimes costing as much or more than college tuition. Mississippi's Child Care Payment Program helps low-income working parents afford the child care they need. These programs have been proven to increase employment, reduce poverty, reduce absenteeism and turnover for employers, contribute more tax revenue into the general fund, and support school readiness in children.

Despite the benefits of early childhood education, the Mississippi Child Care Payment Program only serves a fraction of eligible children. MLICCI tenaciously works to change that.

Because of MLICCI's deep relationships with low-income single mothers and providers, we know that systematic racism and sexism impact the state's current child care assistance climate. Single mothers face an inequitable workforce. Providers struggle to finance services in a punitive policy climate with inadequate revenue. Because of these realities and their intersectionality, in 2015 we launched a campaign to advocate women's economic security. Our movement building is bolstered by our growing gender analysis capacity, as well as our state and national policy partners.