

To: Robert McLellan & Lynne Shanafelt, Department of Early Learning  
From: Leslie Dozono, Early Learning Action Alliance  
Re: Implementation of HB 3141, Working Connections Child Care Reauthorization  
Date: April 26, 2010



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Thank you for meeting with Early Learning Action Alliance members on Monday, April 19<sup>th</sup> to discuss the next steps following the passage of HB 3141 for families who receive support from Working Connections Child Care (WCCC). We hope this memo is helpful to your conversations internally and with DSHS and the Work First Subcabinet.

**I. HB 3141 Section 2 (1) Identifies the following:**

*The department shall establish and implement policies in the working connections child care program to promote stability and quality of care for children from low-income households. Policies for the expenditure of funds constituting the working connections child care program must be consistent with the outcome measures defined in RCW 74.08A.410 and the standards established in this section intended to promote continuity of care for children.*

**II. Early Learning Action Alliance's recommendations for policies that promote stability and quality of care for children from low-income households<sup>1</sup>:**

- Do not require reporting for an increase or decrease of gross monthly family income of \$250
- Extend job search period from 28 days to up to 6 months
- Ensure children served for protective service reasons are automatically eligible for services for 12 months
- Expedite reporting for minor changes

**A. Gross Family Income**

1. If the promotion of stability for children is one of the desired outcomes of Working Connections Child Care, Washington should strive to ensure that minimal changes in a family's economic situation do not result in disruption of child care. Additionally, loss of child care subsidies because of small changes in parent wages can result in a parent's inability to go to work because they no longer have a child care option.
2. ELAA recommends that an increase or decrease of \$250 in gross family income should not result in required reauthorization.

**B. Job Search Requirements<sup>2</sup>**

1. When parents search for a job, child care assistance can help bridge the financial gap as a family's income drops and child care expenses remain the same. At the same time, it ensures that children retain the stability of care needed, especially during a period when parental job loss has increased family stress.
2. WCCC provides child care assistance to: (1) eligible TANF families who require child care to participate in approved WorkFirst activities, job search, employment, or training and (2) non-TANF families who require child care to maintain employment or to attend approved training.<sup>i</sup> (See WAC 170-290-0055)

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<sup>1</sup> Washington State has the flexibility under federal regulations (45 CFR 98.20) to serve families with incomes up to 85% State Median Income, to serve parents who are working or attending a job training or educational program, and to waive income eligibility requirements for children in need of protective services.

<sup>2</sup> Federal regulations allow states to define what qualified as work, education or training and to include job search in the definition of work

3. In Washington, parents are limited to 28 days of job search to remain eligible for child care subsidies (see WAC above)
4. In contrast, at least nine states have used the ARRA stimulus funds to expand the length of allowable time for job search. North Carolina has used ARRA funds to extend job search to up to six months.
5. ELAA recommends that Washington also extend eligible job search period to six months.

**C. Children Served for Protective Service Reasons**

1. Federal CCDF regulations at 98.20 provide that states can waive income eligibility requirements on a case-by-case basis for children in need of protective services.
2. States are required to define protective services in their CCDF State Plans and many include children in foster care, homeless children, children of teen parents, etc.
3. DEL defines protective services in its CCDF plan as “[f]amily is currently homeless or receiving services through Children’s Administration, the Division of Alcohol and Substance Abuse or a homeless or domestic violence shelter.”
4. Given the extenuating circumstances which often result in greater instability for children in protective services, ELAA recommends that children in protective services as defined by DEL in the CCDF plan who are also in Head Start, Early Head Start or ECEAP be granted 12 month reauthorization periods without regard to changes in family income or parent activities.

**D. Allow expedited reporting of minor changes that do not affect eligibility for services**

1. Expedited reporting would include a simple form that could be emailed, mailed, or faxed
2. Minor changes that would be handled through expedited reporting include:
  - a. Change of provider
  - b. Change of hours
  - c. Change of address
  - d. Job loss

The Early Learning Action Alliance shares the Department of Early Learning’s goals to support continuity and stability of care for families and children and the need to minimize overpayments and confusion for parents and providers. We appreciate the opportunity to submit recommendations and look forward to the continued dialogue as we collectively strive to ensure that children in Washington have the supports, opportunities, and relationships they need for a great start in life.

Best,



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<sup>i</sup> <http://www.dshs.wa.gov/rda/research/clientdata/2003/glossary/all.shtm>