



Child Care and Development Fund/Child Care and Development Block Grant

Overview of CCDF

The Child Care and Development Fund (CCDF), also known as Child Care and Development Block Grant (CCDBG) is the main source of funding for child care across the country, including Indian Country. 263 Grantees, representing over 500 tribes and tribal organizations received Child Care and Development Block Grant (CCDBG) funds in FY 2013, with tribal allocations totaling approximately \$102 million. Recent reauthorization of CCDBG amended the Tribal set-aside language from stating that Tribes would receive between 1% and 2% of the amount allocated to CCDF to state that Tribes would receive no less than 2%. Historically, Tribes have received 2% of the allocated CCDF funding which is divided into mandatory and discretionary money. The final Tribal allocation is to be determined by the Secretary.

Mandatory funding is allocated through the reauthorization process and is effective until the CCDBG is reauthorized and the long-term funding determined. The discretionary funding is subject to the annual budget process. For 18 years NICCA has advocated for a set-aside increase of 5%. With no substantial increase in new funding for CCDF for the past 14 years, an increase to the set-aside would have cut funding to states and territories and was not a popular theme with policy makers. This past year saw a very small increase to CCDBG with the reauthorization. The Tribal set-aside for discretionary CCDF was increased to 2.5%.

Federally recognized Tribal governments that apply for CCDF receive funding if they have 50 or more children under the age of 13 years or if they are in a consortium with a combined total of 50 or more children under the age of 13. Since implementation of the CCDF in 1996, more Tribes have applied for funding, which means that more Tribal children have access to CCDF but also means that the 2% set-aside gets smaller and smaller as it is divided into more and more pieces.

Tribes apply for CCDF through a process called the Plan Pre-Print which is completed every other year and is the blueprint for implementing the Tribe's child care services. The plans include lists of questions and are completed by the Tribe and submitted to regional offices via an electronic file such as Word. The Tribal CCDF Plans are not compiled in any kind of a data gathering system that can generate information about Tribal child care programs throughout Indian Country.

Families need to work and have access to high quality child care

- The poverty rate for Native American families with children under the age of 5 is 74% higher than that of the general population
- The median 2010 income for the White population was \$51,846 and for Native American population was \$36,623
- The average annual cost of full-time care can range from about \$4,650 to \$18,200 for an infant in center-based care

- Working parent need assistance to ensure their children can be in quality early learning environments
- Native American students attending local public schools lagged behind the general population in reading by an average of 17 points out of 500 in fourth grade
- Longitudinal studies show that children who attend higher quality child care centers performed better in cognitive and social measures
- Research shows that 80% of the brain develops by age 3. Native American children must have access to quality care to be successful in school

Policy Recommendations

CCDF/CCDBG Reauthorization and Tribal Child Care National Indian Child Care Association Recommendations:

In light of the law reauthorizing the CCDF program, NICCA makes the following recommendations to align with the goals of promoting families' economic self-sufficiency by making child care more affordable, and fostering healthy child development and school success. The following recommendations are designed to strengthen the Tribal CCDF programs and to move one-step closer to meeting the needs of Tribal children and families with the highest quality child care services that are possible.



Revision of Policies

- 1) Maintaining Family-Friendly Policies
 - NICCA recommends that there should be included hardship waivers to allow for care in the child's home under certain circumstances or for multiple children
- 2) Implementing 12 month eligibility re-determination periods
 - NICCA recommends continued flexibility for self-determination of definition of income. NICCA also recommends that Tribes have flexibility in implementing eligibility and re-determination periods. Having a set 12 month eligibility period is not realistic for all Tribes. This may create a hardship for smaller grantees who cannot afford to maintain a waitlist for eligible families, when a parent who may no longer meet eligibility remains on the program for 12 months. Many families have several children who enter care and while we support the importance of continuity of care, it isn't always reasonable, or fiscally responsible, to continue to subsidize parents who do not remain employed for a long period of time, but may bounce in and out of employment until they find stability in the workforce. Especially if there is a waitlist of eligible parents, this can be a hardship for Tribal Grantees to justify keeping families who are not working or attending school in the program for 12 months. As many as 58% of Tribal Grantees currently maintain a waitlist.
- 3) Priority for homeless families
 - NICCA recommends that Tribes should self-determine or define "homeless", allowances for informal custody of family members i.e. grandmother taking care of grandchildren without court guardianship documents.



Health and Safety

- 4) Standards & Monitoring Processes to Ensure the Health and Safety of Child Care
 - NICCA recommends that Tribes should have standards & monitoring processes to ensure health and safety of child care in place. If Tribal Grantees should require additional support for standards of monitoring, there will be efforts made to provide T/TA and the ability to incorporate tribal culture, customs and traditional care.
- 5) Updating OCC's Tribal Health and Safety Standards
 - NICCA recommends that the OCC's Tribal Health and Safety Standards (Orange Book) should not be updated without consultations with Tribes and the ability to incorporate tribal culture, customs and traditional care
- 6) Establishing health and safety requirements in 10 topic areas
 - NICCA recommends that when establishing health and safety requirements in 10 topic areas that should be established in consultation with Tribes and allow for the flexibility of incorporating tribal customs and traditions for care, as well as consider the type of care and size of each program when setting requirements for Tribal Grantees
- 7) Conducting comprehensive criminal background checks on all child care staff
 - NICCA asserts that the length of time it takes to get comprehensive criminal background check results can be a barrier. Tribes need access to criminal background check databases or one should be established for Tribes. Often child care providers are needed with little to no notice.



Quality Enhancements

- 8) Supporting Continuous Quality Improvement
 - NICCA recommends that there be supports for continuous quality improvement for Tribal Child Care, and take into consideration that in supporting continuous quality improvement for Tribes, there must be flexibility and willingness to allow for tribal customs and traditions for care
- 9) Introducing the Tribal Quality Framework
 - NICCA recommends that training and funds should be provided for any new mandates as well as Tribal Consultation



Child Care Workforce

- 10) Building Knowledge and Skills of Child Care Workforce
 - NICCA recommends that Building Knowledge and Skills of Child Care Workforce - Should allow for cultural skills and knowledge to be incorporated in any requirements.

11) Accessing State training and professional development

- NICCA recommends that States should be required to communicate, coordinate and collaborate with any Tribe in their jurisdiction for training opportunities and professional development. States should be required to show documentation of communication with each Tribe in their jurisdiction. States should fund participation as much as possible.

12) Providing ongoing annual training and progression to improve knowledge of providers

- NICCA recommends that when providing ongoing annual training and progression to improve the knowledge of providers Tribal culture, traditions, customs should be taken into consideration. NICCA also recommends that an annual Regional CCDF training be provided in every Region in order to best meet the diverse needs of each Region and to accommodate the grantees access to training.

13) Enhancing health and safety training

- NICCA recommends that Tribal culture, traditions and customs should be taken into consideration; best practices should be shared. When enhancing health and safety, there should be ongoing supports and T/TA that meets the needs of the Tribal Grantees



Child Development

14) Promoting the social-emotional health and development of children

- NICCA recommends that the methodology in promotion of social-emotional health and development of children should be self-determined by Tribes. Tribal culture, traditions and customs should be taken into consideration; tools should be developed to assist caregivers and parents to understand behavioral health and child/brain development



Consumer Knowledge and Parental Access

15) Disseminating information on the full range of child care services

- NICCA recommends that tools/templates should be developed to assist dissemination of information. Allowance for tribal language should be taken into consideration.

16) Parental access to provider-specific information on monitoring reports

- NICCA recommends that parents should participate or have a role in monitoring their providers.



Funding

17) Tribal CCDF Funding

- NICCA recommends that the Tribal CCDF Funding set aside is increased to 5%.



Reporting

18) CCDF Reporting

- NICCA recommends that Tribal CCDF programs should have a reporting mechanism that can be entered into a database and be accessible and searchable for Tribes. The information captured should reflect all CCDF services provided by the Tribes, not just a piece of what Tribal CCDF programs accomplish
- NICCA recommends that CCDF reporting take into consideration the type of programs being operated and how the CCDF funds might be utilized in a Tribal Center vs a voucher program. Reporting should make sense for smaller grantees that may have additional funding supports from their Tribe, as well as larger Tribal grantees that offer multiple services with their CCDF.



Tribal Data

19) Tribal data

- NICCA is concerned about the continued lack of Tribal data. Tribes need data similar to states.
- NICCA recommends that the Plan PrePrint be entered into a database by each CCDF grantee similar in style of the state's so that the information from the Tribes' Plan PrePrints can be utilized to outline the services that Tribes are providing for their children and families
- 102-477 Tribes should contribute to child care data; data should be accessible and disseminated annually.



Training and Technical Assistance

- 20) In addition to mandatory Tribal Grantee standards and monitoring processes to ensure health and safety of child care, the Office of Child Care (OCC) has a responsibility to provide training and technical assistance (T/TA) to Tribes to ensure the new regulations set forth by the CCDF laws are followed.

- NICCA recommends OCC establish annual site visits and TA of ALL CCDF providers: NICCA is in support of all tribes receiving site visits and guidance from OCC, including smaller tribes that receive less funding. NICCA suggests that ACF/OCC Regional staff take on a role and have an increased travel allowance to support the T/TA needed for those Tribal Grantees who need it the most. The OCC Regional Staff should know their Tribal Grantees best, and have the relationship with the Tribal Grantee to support as deemed necessary and as a priority. T/TA funding should be made available so this can take place. Furthermore, we acknowledge the burden that such an undertaking would be, however we recommend a variety of methods to address the need to ensure the overall safety of children while in care. The goal and intention is to bring the standard of care to the highest reasonable quality for ALL children regardless of family income. In order to meet this goal, there must be a system that takes into consideration the diversity within communities providing Tribal Child Care.
- NICCA recommends the following for smaller Tribes:
 - Although smaller tribes may have fewer resources, all tribes should make an effort to adhere to the new health & safety regulations. Exceptions could be made for smaller tribes with limited resources. In this instance, the tribe could request a waiver for that regulation and present a plan as to how they would address the issue without compromising the health and safety of the children in care.
 - Peer monitoring is a suggested option in how this could address the issue without comprising the health or safety of the children in care. Utilizing the established Tribal leaders in our field to support the efforts to ensure each Tribal Grantee has an annual monitoring review, with supportive measures to reach all Tribal Grantees, regardless of size or funding amount.
 - NICCA does not support less T/TA for smaller Tribes, as they often have the least funding and resources available to support higher quality child care, quality enhancements, more stringent health and safety regulations, less staff supports, and the means to engage families who may live in remote locations with limited means of reaching the families being served, or who might be served.



Tribal CCDF Plan Redesign

21) Re-designing the Tribal CCDF Plan

- NICCA recommends that the Tribal Plan PrePrint be re-designed to be completed online by the Tribes in a database that will capture the information from Tribes in a format where the information entered can be assimilated to provide relevant information regarding Tribal Child Care (as the state and territory plans are currently entered into a database and assimilated) . No data currently exists that is relevant to Tribal CCDF programming.
- NICCA recommends that if the smaller Tribal Grantees have a revised Plan, that this is done in consultation with Tribes. A modified Plan should be flexible to meet the diverse needs of Tribes and continue to maintain best practices with flexibility of the diversity of the Tribal Grantees.



Other Recommendations

22) Proposed late/non-reporting protocol

- NICCA recommends that the proposed late/non-reporting protocol should include grievance or appeal process if there are penalties

23) Requirements that should not apply to small Tribes

- Exempt/Non-exempt threshold

Further concerns

NICCA continues to be concerned about:

- The inadequate funding levels for Tribal Child Care
- The failure of legislation and policy to fully address the rights and abilities of tribes to participate in federal domestic assistance programs, and
- Inconsistent relationships between tribes and states that have hampered tribes' abilities to fully implement needed services for children and families.

NICCA also emphasizes the importance of supportive measures required to meet the requirements of the law around health and safety, continuity of care, and high quality child care programming, which make sense for Tribal Grantees and the different types of programs being operated. Tribal Consultation needs to be a priority with face to face consultation with Tribal Leaders or their designees. President Obama's budget slashes through barriers holding back parents and children in struggling working- and middle-class families through a two-generational methodology that can help entire families realize economic security. These proposals include affordable high-quality child care for all low-income parents with children under age four. NICCA shares the President's vision; and with adequate funding and proper written regulations and Training and Technical Assistance for all Tribal Grantees, Tribal Child Care can achieve the goals that President Obama has outlined.

NICCA supports and encourages the need to engage families in the development of their children through outreach and education. NAEYC states, "The research clearly indicates that meaningful engagement of families in their children's early learning supports school readiness and later academic success. For an increasing number of families, engagement in early learning is linked to their children's participation in early childhood programs". NICCA would like to see additional resources to support effectively engaging families in diverse communities, including additional T/TA for programs struggling with this service.

NICCA hopes CCDF reauthorization provisions for Tribal Grantees addresses all of these concerns.

Furthermore, NICCA would like to acknowledge and thank all of the Tribal Leaders who are showing an active interest in their tribal communities future by supporting CCDF and Tribal Child Care initiatives to increase the quality of care for our children, and investing in the future of tribal leaders through education of community agencies, families and the means to create the highest quality early learning environments for our youth. We know that early childhood years lay the foundation for later economic productivity,

responsible citizenship, and a lifetime of sound physical and mental health. Early experiences shape the brain's architecture and set the stage for a child's lifelong success. Ninety percent of brain development occurs by age five; the importance of adult-child interactions literally "wire" a child's brain and determine that child's ultimate cognitive, social, and emotional capacities. This is not only vital information for our families to realize, but also for those outside of the family who care for our children, such as child care providers, early care and education teachers, and all staff who work with children. CCDF helps Tribal Child Care realize the dream of providing enriching, high quality environments which DO help to set the outcome for our children.

Tribal Leaders** *Please share a personal story about your Tribal Community, Tribal Child Care, or Tribal Programs which have been impacted in a positive manner by Child Care and Development Funds (CCDF).*

NICCA would like to recognize and thank the Administration for Children and Families (ACF) Office of Child Care for your efforts in the Child Care and Development Fund (CCDF) reauthorization and the increased Tribal CCDF Discretionary Set-Aside from two percent to 2.5 percent for FY 2015. The increase will begin to help Tribes to meet the CCDBG Act of 2014 laws and regulations. We are incredibly grateful for the long awaited increase; however we want to emphasize the need for a larger set-aside for Tribal CCDF Grantees in order to adequately implement the laws, health and safety requirements, continuity of care, and quality initiatives needed in order to best meet the needs for our children.