



EARLY CHILDHOOD COUNCIL RECOMMENDATION 20130612-6.b.(1)

Date: June 12, 2013

Subject: For Your Information Comments about the Texas Workforce Commission's Proposed Child Care and Development Fund (CCDF) State Plan (45 C.F.R. Part 98) for Federal Fiscal Years 2014 and 2015
<http://www.twc.state.tx.us/svcs/childcare/proposed-child-care-development-fund-state-plan.html>

Recommendation

Comments about the Texas Workforce Commission's Proposed Child Care and Development Fund (CCDF) State Plan with copies to Travis County Commissioners Court, and Workforce Solutions.

Description of Recommendation to Council

Comments to Proposed Child Care and Development Fund State Plan:

1. Increase stability and reduce turnover of children in the system.
2. Improve reimbursement rates.
3. Improve ability to design and operate programs under local controls.

Rationale:

The City of Austin Early Childhood Council (ECC) is a thirteen member advisory body charged with advising and making recommendations to the Austin City Council regarding early childhood issues, including the continued development of a system of quality early care and education. Although the deadline for filing comments with the state occurred before our meeting, we forward the following comments to you for your information. No action is recommended at present the proposed.

The Early Childhood Council is encouraged to see in the plan goals and strategies that seek to improve child care quality and increase parental involvement. Attention to and strategic action toward such goals are critical for successful family outcomes like increased job stability for parents and improved school-readiness for children.

1. It is important and useful to provide resources for parent information and parent choice.
2. Expanding the use of voluntary early learning guidelines can help providers to offer higher quality care to children. It is especially important that care for infants and toddlers improve in quality.
3. The steps for professional development and career opportunities for providers can lead to a better-trained and more stable workforce.

Following are our concerns and suggestions about the plan as it is currently written:

1. Increase stability and reduce turnover of children in the system.
 - a. Complex and onerous eligibility rules and procedural requirements create child turnover, which is harmful to both children and parents. Stability of child care is

essential for children's development as well as for parents' ability to maintain their jobs. The current system makes it too easy for families to lose access to critical child care services because parents make minor mistakes that end their child care assistance. This is especially true for most vulnerable populations, such as teen parents.

When child care ends abruptly, children lose the opportunity for continuous exposure to early education, and parents risk employment loss. We recommend moving to an annual eligibility update to increase stability.

- b. Currently parents are required use a card to swipe in and out of care daily. The swipe card system malfunctions, and its complexity adds to service loss and turnover because eligibility is discontinued for 30 days if the child is recorded as absent for too many days. Providers also lose their reimbursement. If one person delivers the child to a center and another picks up the child, they must find a way to pass on the swipe card during the day. We urge the Texas Workforce Commission to remove the swipe card system until fixes are made. One immediate improvement might be to require only one swipe instead of two per day.
- c. We encourage Workforce Solutions to do an analysis of the reasons for parents leaving the system.

2. Improve reimbursement rates.

Reimbursement rates are often below the market rate. Providers lose money when they serve CCS subsidized children, and therefore often decline to serve or limit number of CCS children they are willing to serve.

Low reimbursement rates restrict parent choice and access to a variety of child care providers, particularly centers that provide early education.

3. Improve ability to design and operate programs under local controls.

This flexibility is especially important for local match programs designed by the community to be responsive to community needs.

Vote

Moved By: Council Member Aletha Huston. Seconded By: Council Member Sophia Casini.
Approved by the Early Childhood Council on a 7 – 0 vote.

Attest:



Kyle Holder, Chair