



## Child Care and Development Fund ACF-801 Clarifications

### *Technical Bulletin #8* *FINAL: May 5, 1999*

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#### I. INTRODUCTION

The purpose of this Bulletin is to clarify a number of issues surrounding the ACF-801 reporting requirement as outlined in ACYF PI-CC-98-01. These questions and issues were collected at recent workshops sponsored by the Child Care Bureau (CCB) in Dallas, TX and Baltimore, MD. This Bulletin provides clarifications from the Child Care Bureau in two parts. First, this Bulletin tackles definitional questions about the report population and various individual elements. Second, this bulletin provides a guide to help States and Territories to report pooled funds if appropriate.

#### II. DEFINITIONAL QUESTIONS AND ANSWERS

##### *Population*

1. **Question:** Should the reporting population be based on the month the service was provided or on the payment made during the reporting month?

**Answer:** States need to base their population on those for whom services were actually provided in the reporting month, irrespective of when payment is made for those services.

States that do not have the data in their current systems and plan to use a sample indicate that they will need one additional month to capture the information for services actually provided for every reporting month. These States should submit a written request to their ACF Regional Administrator with a justification for an additional one month delay in data submission for their monthly data. This option is only available for States that submit their data monthly. The Child Care Bureau will grant a justified delayed submission *for a maximum of 12 reporting months*. During these 12 months States are encouraged to develop appropriate data systems which will enable them to submit FY 1999 data on time.

2. **Question:** How should a State count children in pre-Kindergarten (pre-K) programs that are being used for Child Care and Development (CCDF) match or Maintenance of Effort (MOE) requirements? According to Section 98.53 of the CCDF regulations, States must ensure that children receiving pre-K services meet the eligibility requirements in the CCDF plan. However, States that do not have exact information are allowed to "develop a sound methodology for estimating the percentage of children served in the pre-K program who are CCDF eligible". There is thus an inherent discrepancy between the case-level reporting requirements (requiring the ability to identify and report on each child receiving CCDF funds) and the instructions in the regulations (allowing for estimates of the percentage of children receiving pre-K services who are CCDF eligible).

**Answer:** States will not be required to submit case level information on their pre-K services. Instead they will have to submit to the Child Care Bureau an estimate of the number of child care slots being provided by pre-K CCDF funds each reporting month. This information should be provided in the summary record for each submission. This requirement changes previously distributed file format instructions found in Technical Assistance Bulletin #4: ACF-801 File Format. The revised portion of Technical Assistance Bulletin #4 (Revised 3/20/98) is found in Appendix I.

### ***Head of Family Receiving Assistance***

3. **Question:** What is the exact definition of "Head of Family Receiving Assistance"? Is this the same as "Head of Household?"

**Answer:** For the purposes of child care reporting, the "Head of Family Receiving Assistance" refers to the head of the family receiving child care assistance. The "Head of Family Receiving Assistance," therefore, is the person for whom eligibility is determined.

If the head of the family is the child receiving assistance (e.g., some protective services cases), then all elements refer to child.

### ***Single Parent (Element #5)***

4. **Question:** For many States, income determines eligibility for CCDF, not marital status. In their systems, States identify who in the household has financial responsibility for the children. Obtaining marital status of the applicants is not necessary since it is not an important part of their systems. For most of the States, composition of the family is different from, and more relevant, than tracking marital status.

**Answer:** The Child Care Bureau has modified its definition of Element #5 (Single Parent) to the following:

Single parent: Only one parent living with a child who is legally/financially responsible for the child and there is no other adult legally/financially responsible for the child in that eligible family. If there is someone else in the household, who does not have legal/financial responsibility for the child, then the legally/financially responsible applicant is still considered a single parent.

### ***Income and Family Income Sources (Elements #9-#15)***

5. **Question:** Please provide a definition for Element #12 (State Program for Which State Spending is Counted Towards TANF MOE).

**Answer:** Temporary Assistance to Needy Families (TANF) MOE programs are State-funded initiatives which provide temporary assistance to needy families. States will need to consult with their TANF program to determine which programs are used for TANF MOE in their State, since these programs differ from State to State.

6. **Question:** Are we reporting all income or just income used for determining eligibility?

**Answer:** In Element #9 (Total Monthly Family Income for Determining Eligibility), States report only the income that makes the family eligible for child care. In Elements #10-#15 States must check off every family income source even if the State does not use them for eligibility determination.

7. **Question:** In our State, if you receive TANF, you are automatically eligible for child care. We do not do income determination in those cases. Do we still need to report income?

**Answer:** Yes, report any TANF cash assistance payment and any other income counted towards child care eligibility. Do not include income disregarded in TANF eligibility determination. (Reminder: States must ensure that all children meet CCDF eligibility, regardless of other categorical eligibility.)

***Ethnicity and Race (Elements #17-#22)***

- 8. Question:** What do we report if some parents refuse to report race?

**Answer:** Leave the field blank as "missing" data for those that refused to report their race. This is the same way "unknown" is reported.

***Type of Child Care (Element #25)***

- 9. Question:** Can the definition of "relative" be changed? In our State we do not require providers to be 18 years old, so the relative definition does not work for us since a sibling could be less than 18 and caring for the child. Can we use our own State's definition of "relative"?

**Answer:** The definition of relative is based on the Child Care and Development Block Grant (CCDBG) health and safety requirements: a child care provider who is, by marriage, blood relationship, or court decree, the grandparent, great-grandparent, aunt, uncle or older sibling (who lives outside the home). We have dropped the age limit requirements for reporting purposes only. (Reminder: A relative under 18 cannot be exempt by the State from meeting health and safety standards.)

- 10. Question:** What is the difference between licensed/regulated and legally operating? Does the definition hinge upon "monitoring" capabilities of the State or is it based on the "enforcement capacity"?

**Answer:** For reporting purposes, a legally operating, unregulated provider is one which, if not participating in the CCDF program, would not be subject to any state or local child care regulations. According to section 98.2(x) of the CCDBG regulations, "*Licensing or regulatory requirements* means requirements necessary for a provider to legally provide child care services in a State or locality, including registration requirements established under State, local or Tribal law...."

***Expected Total Amount to Be Paid to the Provider (Element #26)***

- 11. Question:** In Element #26 (Total Amount Paid to Provider) the definition does not include language to indicate that this includes the parental co-pay.

**Answer:** The total monthly amount should include the assigned parental payment (co-pay) and any Federal, State, and locally funded subsidy. It should not include any other amount the provider might charge the parent over and above the approved payment rate. The instructions to this item will be revised when the Child Care Bureau re-submits the form ACF-801 for Office of Management and Budget (OMB) approval.

### III. CCDF FUNDING RATIO GUIDANCE

For reporting purposes, the Child Care Bureau wants to know about the number of children and families served through the Child Care and Development Fund. Many Lead Agencies, however, combine non-CCDF monies to serve the child care needs of their State and do not serve children exclusively with CCDF funds. To ease reporting requirements for those States, we have established a methodology for reporting which allows States to report on all children served when CCDF funds are combined with other monies to serve children.

#### ***Methodology:***

1. Determine whether the State pays for subsidized care for CCDF eligible children with both CCDF and non-CCDF funds during the Federal fiscal year. This should be based on the annual funds for the Federal fiscal year.
2. The Child Care Bureau prefers that States report only on those families and children served with CCDF funds; however, if a State is unable to do so, they may report on all families and children served and the applicable CCDF funding ratio. Calculate the pooling ratio as follows:

The pool is composed of two parts:

1. CCDF Funds (includes total amount available, including quality and administrative funds):
  - Discretionary (including set-asides for Child Care Resource & Referral and school-age care)
  - Mandatory
  - Matching Funds--Federal
  - Matching Funds--State (Including pre-K funds)
  - Maintenance of Effort (Including pre-K funds)
  - Transfer from TANF into Discretionary Fund
  - CCDBG Funds from previous years
2. Non-CCDF Funds used to provide subsidized child care for CCDF eligible families (examples):
  - Any State-only funds spent above the amount needed to satisfy MOE and the State's full share of the match
  - Title XX funds
  - Title IV-E funds for children in foster care
  - Job Training Partnership Act (JTPA) funds
  - Non-compulsory education programs
  - Housing and Urban Development (HUD) Child Care

To calculate the pool, add the CCDF Funds to the non-CCDF Funds and divide the amount of CCDF Funds (numerator) by the total (denominator):

$$\frac{\text{CCDF Funds}}{\text{CCDF Funds and non-CCDF Funds}} \times 100 = \% \text{ CCDF}$$

Report the final pooled figures for the Federal fiscal year annually on the ACF-800 as a footnote. The predicted funding ratio for the current Federal fiscal year is also reported in the sampling plan or letter of intent for full population submissions of the case-level data (ACF-801). If there is a major or unexpected change in the ratio, States may submit a revision to the ratio any time the monthly sample/full population file is submitted.

Note: There may be other accounting-related requirements for States which pool funds. This guidance is for program reporting purposes only, and does not address other financial requirements related to establishing or managing pooled funds.

#### IV. CONCLUSION

This bulletin has clarified some definitional questions for the ACF-801 and outlined steps for States and Territories to use to determine their reporting pool. If you have any other questions, please do not hesitate to contact the Reports Manager at the Child Care Bureau.

**APPENDIX 1:**  
**New Monthly Summary Record**  
*Revised 3/20/98: Revisions in bold*

*The Monthly Summary Record:*

Each month's data begins with a record containing the following data:

Data Element Description	Format <sup>1</sup>	Length	Comment
Delimiter	<i>M</i>	1	This delimiter identifies the following record as a monthly summary record.
Report Period	YYYYMM	6	This data element identifies the month being reported. For example, if the report covers April 1998, this element would be "199804".
Families Receiving Subsidized Child Care	Number	7	The number of families receiving subsidized child care in your State for the reported month. The number should be right-justified within the field and padded with zeros. For example, 25,387 would be formatted as "0025387".
<b>Number of Children in Pre-K Child Care</b>	<b>Number</b>	<b>7</b>	<b>The number of children (or estimated number if actual count is unavailable) receiving subsidized pre-K child care services in your State for the report month. The number should be right justified within the field and padded with zeros. For example, 5,247 would be formatted as "0005247".</b>
Delimiter	#	1	Identifies the following data as contact information.
State Contact Name	Character	No limit	The name of the State child care contact who is designated to receive the data reports.
Delimiter	#	1	Identifies the following data as contact information.
State Contact Telephone Number	Character	No limit	The telephone number of the State child care contact.
Delimiter	#	1	Identifies the following data as contact information.

<sup>1</sup> Key for Format Codes:

Character Any alphanumeric character.

Number Digits from 0-9.

*M,F,C,S,N,#,\$,%,&* These italicized characters are literals; the character as it appears should be included in the file.

YYYYMM Format for dates, indicating that dates should be reported as a four digit year and a two digit month such as '199804' for April, 1998.

Data Element Description	Format <sup>1</sup>	Length	Comment
State Contact Fax Number	Character	No limit	The fax number of the State child care contact.
Delimiter	#	1	Identifies the following data as contact information.
State Contact E-mail Address	Character	No limit	The e-mail address of the State child care contact
Record Delimiter	\$	1	This delimiter indicates the end of the record.

Source: Technical Bulletin #4: ACF-801 File Format (Revised:3/20/98)

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