



ADMINISTRATION FOR  
**CHILDREN & FAMILIES**



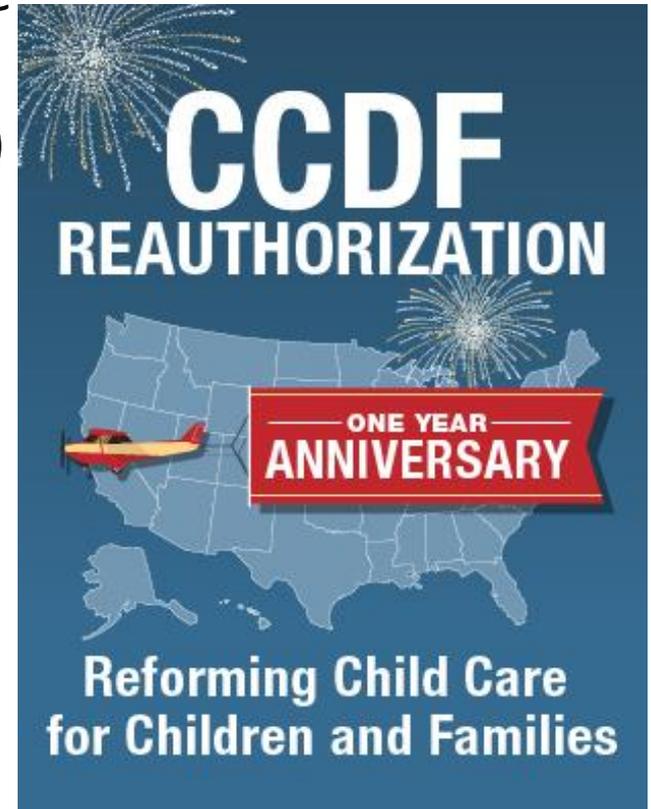
# **FY2016-2018 CCDF Plan Preprint: Overview for States and Territories**

**January 27, 2016**



# Introduction

- The 2014 bipartisan reauthorization was an historic re-envisioning of the child care law and included many changes to the Child Care and Development Fund (CCDF) plan
- The new CCDF plan:
  - Reflects the law
  - Is an opportunity to describe the State/Territory vision for child care
  - Has two key structural changes
    - Implementation plans
    - Waiver/extension requests

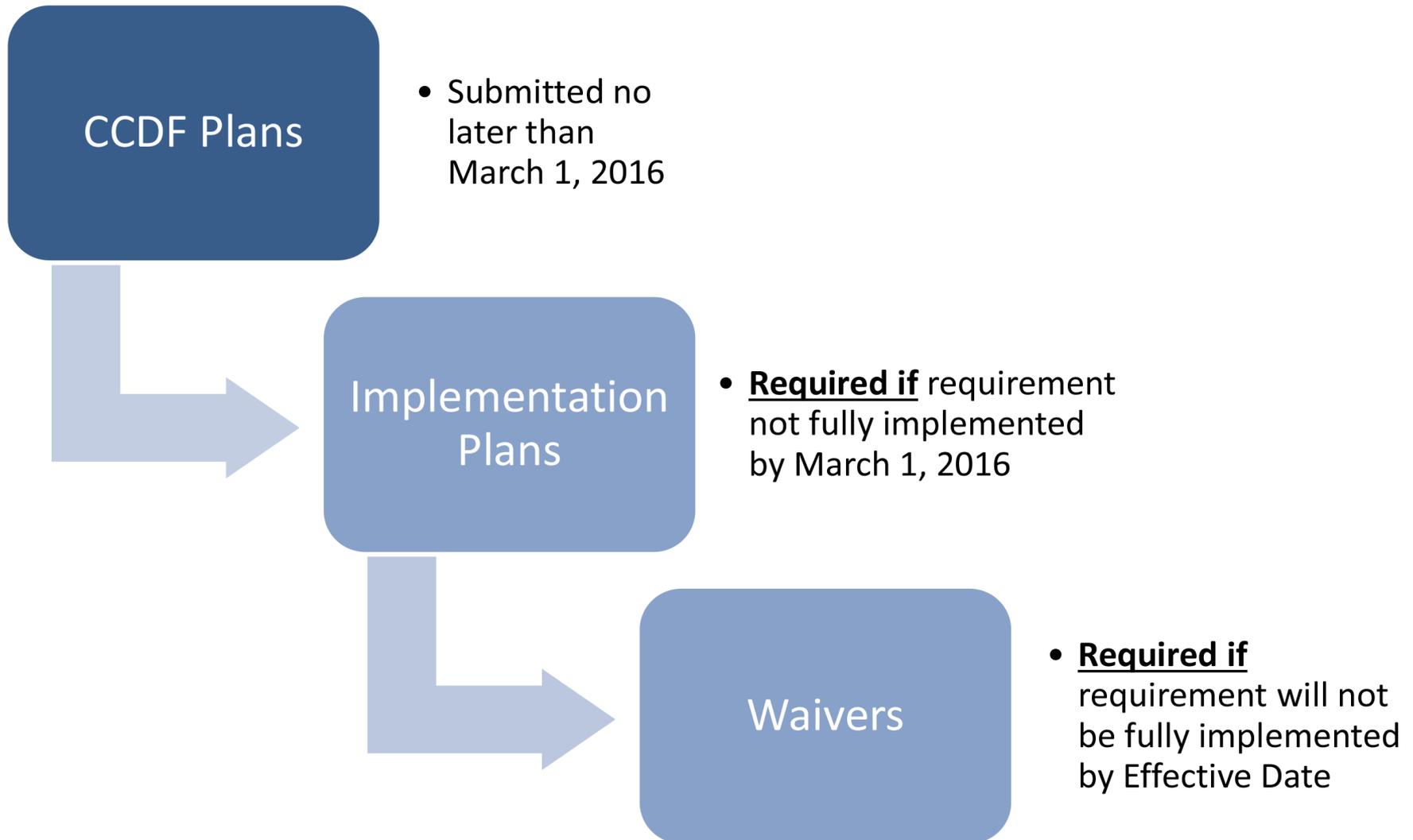


# CCDF Plan Overview

## Eight sections linked to CCDBG Act of 2014

- 1) CCDF Leadership and Coordination
- 2) Promote Family Engagement through Outreach and Consumer Education
- 3) Stable Child Care Financial Assistance
- 4) Ensure Equal Access to High Quality Child Care
- 5) Establish Standards and Monitoring Processes to Ensure Health and Safety
- 6) Recruit and Retain a Qualified and Effective Workforce
- 7) Support Continuous Quality Improvement
- 8) Ensure Grantee Accountability

# Complete CCDF Plan Components



# Lead Agencies' Responsibility

*to “administer, directly or through other State governmental or non-governmental agencies...” the funds received*

*[section 658D(b)(1)(A)]*

- Promulgate all rules and regulations of the CCDF program;
- Ensure compliance with the approved Plan and all Federal requirements;
- Oversee the expenditure of funds by sub-grantees and contractors; and
- Ensure that any local or non-governmental entities through which the State administers the program operate according to the rules established for the CCDF.

# Overview Plan Effective Dates

Plan	Plan Submission Date	Plan Effective Date	CCDF Plan Period	Key Dates
FY16-18 Plan (triennial)	March 1, 2016	June 1, 2016	June 2016- September 2018	<p><b>Public Hearing:</b> Public hearing September 1, 2015 to March 1, 2016</p> <p><b>MRS/Alternative Methodology:</b> July 1, 2013 – March 1, 2016</p>
FY19-21 Plan	July 1, 2018	October 1, 2018	October 2018- September 2021	<p><b>MRS/Alternative Methodology:</b> July 1, 2016 – June 30, 2018</p>

# Key Reminders

- States and Territories are to respond in accordance with the law based on their reasonable interpretation of the requirements in the revised CCDBG statute
- Plan contains definitions where provided by law. For terminology not defined in law, some illustrative examples may be provided.
  - These should only be considered examples, and not requirements, for purposes of responding
  - If no definitions are provided, States/Territories should respond based on their own definitions for those terms
- In cases where CCDBG Act of 2014 did not change CCDF regulatory requirements (e.g., Public Hearing requirements), the CCDF regulations are still in effect and relevant questions are included in this Plan

# Guidance for Completing Plan

- In responding to questions, States and Territories are asked to provide brief, specific summary text and/or bullet points only. Do not use tables or copy and paste charts, attachments or manuals into the Plan
- Comprehensive summary of the topical implementation plans across sections will be generated electronically to facilitate monitoring of progress towards completion

# Plan Submission Checklist

- ✓ Deadline March 1, 2016
- ✓ Public hearing held “no earlier than” September 1, 2015
- ✓ MRS or Alternative Methodology conducted “no earlier than July 1, 2013
- ✓ If applicable, Implementation Plan(s) completed for all requirements not met by March 1, 2016
- ✓ If applicable, Waiver requests/temporary extensions completed for all requirements not met by 2016 effective date(s)

# Implementation Plan & Plan Amendments

*If a State or Territory cannot certify compliance with specific requirement(s) at the time of Plan submission (March 1, 2016), Lead Agency must provide an implementation plan for how it will achieve compliance with the provision of the Act*

# Implementation Plan

Question	Effective Date	Question	Effective Date	Question	Effective Date
1.8.1		4.4.2		5.2.2c	Nov. 19, 2016
2.2.1		4.5.1		5.2.2d	Nov. 19, 2016
2.2.8		4.6.3		5.2.2e	Nov. 19, 2016
2.3.1	Nov. 19, 2017* <i>monitoring &amp; inspection reports</i>	5.1.3		5.3.1	Sept 30, 2017
3.1.5		5.1.6a		6.1.1	
3.1.6		5.1.6b		6.1.10	
3.2.2		5.2.1		6.2.3	
3.3.1		5.2.2a	Nov. 19, 2016	6.3.1	
3.3.3		5.2.2b	Nov. 19, 2016		

\* All other effective dates are Sept. 30<sup>th</sup>, 2016

# Implementation Plan

- Implementation Plan must provide sufficient information to support Plan approval and include:
  - Overall target completion date (no later than the effective date) \*(unless there is an approved waiver for an extension to this date)
  - Current status for any requirement (met and unmet)
  - Specific steps (activities) that will be taken to complete the implementation of the unmet requirement(s)
  - Timeline for implementation of unmet requirement(s), including start date and end date
  - Agency and partners responsible for completing implementation of the activities

# Guidance for Implementation Plans

- E-submission (ACF-118) site will allow those multiple steps and associated timelines to be outlined
- Lead Agencies encouraged to be brief and concise in outlining Implementation Plan components – major actions to accomplish key milestones
  - Example: Instead of outlining all steps for the RFP process to initiate consumer education website (e.g., write RFP, issue RFP, award RFP, etc.), could simply respond “complete RFP process” as a task

# Guidance for Full Implementation

- If new requirement is fully implemented by March 1, 2016, no Implementation Plan is required.
- Note – If initial Plan submission has “fully implemented” for a requirement, OCC may:
  - Request further clarification to ensure compliance
  - Request submission of an Implementation Plan if found not to be fully implemented during the review period

# Plan Amendments

- Plan amendments required after Plan approval (June 1):
  - To certify full implementation of the requirement(s) and “close” the Implementation Plan
  - Submit within 60 days of State/Territory’s effective date for fully implementing the requirement(s)
  - Lead Agency is encouraged to contact ACF Regional staff to discuss any proposed amendments

# Temporary Extension/Waiver Requests

*If a State or Territory is not going to be in compliance with one or more provisions by the effective date deadline, then the State/Territory must request a temporary extension/waiver for each requirement*

# Temporary Extension/Waiver Requests

Waivers (Temporary Extension)	Waiver Request Must:		Considerations for Approval
<ul style="list-style-type: none"> <li>Up to 3 years, with option of 1 year extension</li> <li>No authority for permanent waivers</li> </ul>	<ol style="list-style-type: none"> <li>Detail each sanction requesting relief from</li> <li>Describe how waiver from sanction will, by itself, improve delivery of child care services</li> <li>Certify health, safety and well-being of children not compromised by waiver</li> </ol>	<ol style="list-style-type: none"> <li>Identify Reasons :               <ul style="list-style-type: none"> <li>Conflicting or duplicative requirements preventing effective delivery</li> <li>Extraordinary circumstances, such as natural disaster or financial crisis</li> <li>Extended period of time for legislature to enact legislation</li> </ul> </li> </ol>	<ul style="list-style-type: none"> <li>Circumstances in request prevent State from complying with statutory requirements</li> <li>Waiver will, by itself, contribute to or enhance State's ability to carry out purposes of CCDF</li> <li>Waiver will not contribute to inconsistency with objectives of Act</li> </ul>

# Guidance for Temporary Extensions/Waiver Requests

- Submit waiver request with CCDF Plan no later than March 1, 2016 for requirements with 2016 effective date (**all except background checks and posting of monitoring and inspection reports**)
  - Timelines and activities in the associated Implementation Plans for waiver extensions should reflect as much accuracy as possible based on availability of knowledge or information at time of submission
  - Waiver requests will be reviewed as part of Plan review and approval process
    - OCC must submit a report to Congress detailing waiver approvals and any disapprovals
- Note – Waiver request will be required, even if not originally submitted with Plan, if the State/Territory will not meet the requirements by the effective date
    - Example: State expected to fully implement 12-month eligibility by September 30, 2016 so no waiver submitted with Plan. As of September 1, 2016, State realizes 12-month eligibility won't be fully implemented until January 1, 2017. At that point a waiver request will be required along with a modified Implementation Plan.

# RESOURCES

- Program Instruction
  - January, 2015: CCDF Reauthorization Effective Dates
  - April, 2015: Guidance on Extension and Submission of FY2016-2018 CCDF Plans
  - December, 2015: Final State/Territory FY2016-2018 CCDF Plan Preprint

## Upcoming Activities

- Webinar on ACF-118

# Questions?

- Please use the Chat box