



## Child Care and Development Fund ACF-801 Clarifications

*Technical Bulletin #8r-v2*  
*REVISED: November 2011*

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### I. INTRODUCTION

The purpose of this Bulletin is to clarify a number of issues surrounding the ACF-801 reporting requirements. This Bulletin has been updated to address new requirements and clarify other information. Section II provides guidance related to definitions of specific data elements and data element response options. Section III contains contact information if you have questions or need further assistance. Changes in reporting information on the revised ACF-801 Summary Record are provided in Appendix I.

Throughout this document we use the word “States” to mean State and Territory grantees.

### II. DATA ELEMENT DEFINITIONS AND RESPONSE OPTIONS

#### General:

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

**Answer:** States need to base their ACF-801 report on those families for whom services actually were provided in the reporting month, irrespective of when payment is made for those services. Some States may identify monthly services provided by using their payments database to locate services for which a payment has been made. Regardless of the source of the information, the ACF-801 should reflect services that were provided during the month for which the report is being prepared.

2. **Question:** Our State “pools” funds from a variety of sources in order to administer our child care program. In our data system, we are not able to identify or track children served only with CCDF funds. What population of children should be reported on the ACF-801 report?

**Answer:** If a State is pooling funds to administer their child care program and is not able to track children served only with CCDF funds, the State should report the entire population of families and children receiving services on the ACF-801 report. The State reports the percentage of the total child care budget represented by CCDF funds on the ACF-800 report. The OCC will use this information to estimate the number of families and children served using only CCDF funds.

- 3. Question:** Sometimes a family may decline to report some information such as ethnicity, race, or SSN. What should we do in such a case?

**Answer:** If a family does not report information such as ethnicity or race, leave the field blank as "missing" data for those that refused to report. This is the same way "unknown" is reported.

If a family does not report SSN (data element #3) leave the field blank. In any such case, the State is then required to report data element #2 (Unique Identification Case Number). Note that if a family does provide an SSN, the State is required to include the SSN on the ACF-801 report.

- 4. Question:** Unique reporting situations require us to provide footnotes to explain unusual reporting circumstances. How often should we provide footnotes and when should they be removed.

**Answer:** Footnotes provided on the ACF-801 should be reviewed and updated on a monthly basis to ensure that they remain accurate and relevant to the data reported. Refer to Technical Bulletin # 4: *ACF-801 Case-Level File Format* for detailed instruction on the proper way to format footnotes.

### **Family Record:**

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

**Answer:** The "Head of Family Receiving Assistance" is generally the applicant and 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. When a child is reported as the head of the household (code 9 for data element #5), the reason for care is protective services (code 4 or 9 for data element #6) and the family size must equal one (enter "1" for data element #16).

- 6. Question:** Why is OCC interested in the marital status of the head of the family receiving services?

**Answer:** OCC wants to know how many adults are legally/financially responsible for the care of the child(ren) receiving subsidized services. This may be different from "marital status." For ACF-801 reporting purposes, the definition of Element #5 (Single Parent) is:

*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.*

7. **Question:** Families are sometimes determined eligible for a subsidy for reasons other than work, training, or protective services. Can I report these cases indicating some “other” reason for care?

**Answer:** According to Child Care and Development Block Grant (CCDBG) regulations, only those families who are working, in a training program, or in protective services are eligible to receive a child care subsidy.

Effective October 1, 2010, the response categories “5-Other” and “0-Federal Declared Emergency and Other” are eliminated from data element #6 on the ACF-801, and you must report using only the remaining categories. States/Territories should report responses that correspond to the State’s definitions of “working”, “attending”, “job training and educational program”, and “protective services” that are included in its approved CCDF Plan. For example, if job search is included in the State/Territorial definition of “working” in the CCDF Plan, then job search activity should also be reported on the ACF-801 Report as “working” and footnoted as such. *Implementation of this modification was effective on October 1, 2010. After this date, any values of “0” or “5” are considered invalid.*

8. **Question:** In our State, parents of foster children must be working in order to receive a child care subsidy. What guidance can the OCC provide on how to report children who are in the care of Protective Services (PS) or are in Foster care or other out-of-home placements?

**Answer:** States and Territories have considerable latitude when defining criteria that determine eligibility to receive a CCDF subsidy. States and Territories also have considerable latitude when defining how to report the families and children receiving child care services that are supported with a CCDF subsidy as long as the state meets broad Federal guidelines.

The **primary** factor that should be used to determine how to report a specific family/child is the “**reason for care**” – i.e. what it is that makes this family or child eligible to receive a CCDF subsidy.

For unique circumstances when a child may be in the legal care of the State, is in a Protective Services (PS) status, and/or is living with a foster family who would not otherwise meet CCDF eligibility requirements (income limits, working or in training), the OCC designated a separate reporting category for that child. In such cases, a State may report the child as an independent “family,” with a *family size* of one, and with a *reason for care* being PS. There would not be any income or other family demographic information associated with this child.

*Reporting Summary for This Situation*

- Data Element 3 (Social Security Number) may be Child’s SSN; either Data Element 2 or 3 must be provided
- Data Element 5 = 9 (single parent as “Child head of household”)
- Data Element 6 = 4 or 9 (Reason for care as Protective Services)
- Data Element 7 (Co-payment) - not required
- Data Element 9 (Income for Determining Eligibility) - not required
- Data Elements 10 through 15 (Sources of Income) - not required
- Data Element 16 (family size) must be 1.

Using the “reason for care” (i.e. eligibility criteria) as the foundation for decisions about how to record specific families/children, the following examples may be illustrative:

*Scenario 1:*

- A family is eligible by virtue of income limits and working/training status to receive a subsidy for its children. Regardless of whether one or all of the children in that family are in a PS status, that family could be reported as receiving care because the parents are working and/or in training. There would be no separate PS reporting for children from that family who are in the care of PS.

*Reporting Summary for This Situation*

- Data Element 3 (Social Security Number), if reported at all, is the SSN of one of the parents; either Data Element 2 or 3 must be provided based on the head of household information
- Data Element 5 = 0 or 1 (single parent based on one or two adults who are responsible for the child)
- Data Element 6 = not equal to 4 or 9 (Reason for care not reported as Protective Services)
- Data Element 7 (Co-payment) - required
- Data Element 9 (Income for Determining Eligibility) - required
- Data Elements 10 through 15 (Sources of Income) - required
- Data Element 16 (family size) must not be less than 2.

*Scenario 2:*

- A child is in PS care and placed with a foster family. In that State, eligibility for foster families is based on income limits and working/training status, and all foster children in the foster home would be eligible to receive care based on the foster family's eligibility. Reason for care for these foster children would be because the foster parents are working or in training. In this situation, family demographics would be reported for the foster family.

*Reporting Summary for This Situation*

- Data Element 3 (Social Security Number), if reported at all, is the SSN of one of the foster parent(s); either Data Element 2 or 3 must be provided based on the foster family's head of household information.
- Data Element 5 = 0 or 1 (single parent based on one or two foster parents being responsible for the child)
- Data Element 6 = equal to 1, 2, 3, 6, 7 or 8 (Reason for care reported as Employment or Training/Education)
- Data Element 7 (Co-payment) - required
- Data Element 9 (Income for Determining Eligibility) - required
- Data Elements 10 through 15 (Sources of Income) - required
- Data Element 16 (family size) must not be less than 2.

*Scenario 3:*

- A family (or foster family) is not eligible to receive a child care subsidy (i.e., does not meet income and/or work requirements) and has one or more children, living in the home, who are in the care of PS. Each of these children is eligible to receive a subsidy by virtue of his/her PS status. The children could either be reported together under one family unit with PS as reason for care OR each child could be reported separately as an independent family, with family size of one, and PS as reason for care.

*Reporting Summary for This Situation*

If children are reported **under one family** record on the ACF-801:

- Data Element 3 (Social Security Number), if reported at all, is the SSN of the family's head of household; either Data Element 2 or 3 must be provided
- Data Element 5 = 0 or 1 (single parent based on one or two adults being responsible for the child)
- Data Element 6 = 4 or 9 (Reason for care as Protective Services)
- Data Element 7 (Co-payment) - not required
- Data Element 9 (Income for Determining Eligibility) - not required
- Data Elements 10 through 15 (Sources of Income) - not required
- Data Element 16 (family size) must not be less than 2.

If each child is reported **separately** on the ACF-801:

- Data Element 3 (Social Security Number) should be Child's SSN; either Data Element 2 or 3 must be provided
- Data Element 5 = 9 (Child head of household)
- Data Element 6 = 4 or 9 (Reason for care as Protective Services)
- Data Element 7 (Co-payment) - not required
- Data Element 9 (Income for Determining Eligibility) - not required
- Data Elements 10 through 15 (Sources of Income) - not required
- Data Element 16 (family size) must be 1.

- 9. Question:** Effective FFY2007, OCC added additional response categories to the “*Reason for Care*” data element. These options referred to Federally declared emergencies. What exactly is OCC trying to learn with these new options, and what guidelines are available for using the emergency options to indicate *reason for care*?

**Answer:** As detailed in Information Memorandum *ACYF-IM-CC-05-03: Flexibility in Spending CCDF funds in Response to Federal or State Declared Emergency Situations* (<http://www.acf.hhs.gov/programs/occ/law/guidance/current/im0503/im0503.htm>), states have broad flexibility to operate the CCDF program within some general Federal requirements.

OCC created three additional response categories to provide states with a way to document the provision of child care subsidies to families impacted by a Federally declared emergency in order to help capture the impact of the emergency on the child care program.

Clarifications for some specific questions about using these newly defined categories are included below.

- 9a. Question:** If a family already is eligible for, and receiving, child care services, should their record be edited with a new reason for care, now that they also may be impacted by an emergency situation?

**Answer:** If a family is already eligible for and receiving child care services, you do not need to edit their record and change the reason for care as long as that original reason remains valid. Their reason for care would be the reason you originally deemed them eligible to receive services for the specified eligibility period.

- 9b. Question:** How long would a family/child be reported under one of the emergency categories?

**Answer:** The State has flexibility to decide the length of time and when to stop reporting a family/child under one of the emergency categories. In general, this should correspond with the period of time when families are significantly impacted by the emergency.

The “Federally Declared Emergency” categories under “reason for care” do not differ from the standard “reason for care” categories with regards to eligibility determination. The additional categories with the preceding “Federally Declared Emergency” are only used to flag families that are being served under a normal eligibility category (e.g., they are working or in an education program or they are receiving protective services as defined in the State Plan), but they are applying for assistance as the result of a Federally declared emergency. In other words, the category “Employment” only differs from the category “Federally Declared Emergency and Employment” by virtue of the fact the family in the latter category applied for and received assistance based on employment as a qualifying reason for care and was impacted by a Federally declared emergency.

**9c. Question:** If a family started receiving services as a result of a Federally declared emergency and continued to be eligible after the emergency, that would require a change in the *reason for care* to a non-emergency reason. Would this change in *reason for care* require an accompanying change in the “start date?”

**Answer:** As long as the family’s service was not interrupted for a period of 90 days or more, any changes in the family’s *reason for care* does not require an accompanying change in the family “start date”.

**9d. Question:** The Information Memorandum indicates that funds can be used for either Federal or State declared emergencies, however, the ACF-801 reporting categories refer only to Federally declared emergencies. Should States report only cases related to Federally declared emergencies or report cases related to State emergencies as well?

**Answer:** On the ACF-801, states should only report cases related to Federally declared emergencies. The Office of Child Care is interested in learning how States and Territories manage their child care programs and policies during emergency situations.

**10. 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) Maintenance of Effort (MOE) programs are State-funded initiatives which provide cash assistance to very low income or at risk families. States should consult with their TANF program to determine which if any programs are used for TANF MOE in their State, since these programs differ from State to State.

**11. Question:** Are States to report all income or just income used for determining eligibility?

**Answer:** In Element #9 (Total Monthly Eligibility Income), States report only the income used when calculating eligibility for child care. This is the total monthly dollar amount that is received by the family seeking assistance, prior to any deductions that may be allowed. The income each State uses to determine eligibility should be defined in and part of, the approved State Plan.

In Elements #10-15, States must report all family income sources even if the State does not include that specific income for eligibility determination.

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

**Answer:** Yes, report any TANF cash assistance payment and any other income counted towards TANF 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.)

### **Child Record:**

**13. Question:** Some families report ethnicity for the children receiving services, but may not report the child's race or vice versa. How should a State report these data elements if information about the Child's ethnicity or race is not given?

**Answer:** Effective FFY2000, race and ethnicity are two different elements and should be reported separately. If the client reports only the ethnicity of the child and refuses to report race, report the ethnicity information and leave the race fields blank as "missing" data. If the client reports only the race of the child, refusing to report ethnicity, report the race of the child and leave the ethnicity field blank as "missing" data. Reporting missing data as blank is the same way "unknown" is reported.

### **Setting Record:**

**14. Question:** Can the definition of "relative provider" 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 provider"?

**Answer:** In the Child Care and Development Block Grant Act and CCDF regulations, the definition of eligible provider includes a requirement that a relative provider be at least age 18 in order for the State to have the option of exempting the provider from health and safety requirements. In other words, a relative under 18 cannot be exempt by the State from meeting health and safety standards. For CCDF administrative data reporting purposes, a relative provider is defined as being the grandparent, great-grandparent, aunt or uncle, or sibling (living outside of the child's home) of the child in care. There is no reference to an age requirement for purposes of data reporting. Therefore, any relative providers included in the definition, regardless of age, should be reported as a relative provider.

**15. 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, the terms "licensed/regulated" and "legally-operating" are intentionally broad to recognize that grantees operate differently. The term "regulated" is used because not all grantees define "licensed" in the same way, or even use the term consistently. Some grantees have processes that they call "certification" or "registration". The "licensed/regulated provider" category is intended to encompass any of these regulatory processes.

On the other hand, the "legally operating provider" category is intended to include providers who would not otherwise be subject to any regulatory standards (licensing, certification, registration, etc), were it not for the fact that the provider is participating in the subsidy program. A number of States exempt certain family child care homes from regulation--most typically relative providers or providers caring for small numbers of children. Some States also exempt certain centers (e.g., faith-based providers) from regulation. These are the providers that would be reported as "legally operating" or "no license category available". Note that these providers must still meet CCDF health and safety standards.

**16. Question:** Should Element #27 (Total Amount Paid to Provider) include the parental co-pay?

**Answer:** Effective October 1, 2010, element #27 should not include the assigned parental payment (co-pay). It should only include any government-funded subsidy and any payment differential that the State makes to the providers based on achievement of defined quality standards. It should not include any other amount the provider might charge the parent over and above the approved payment rate. Prior to October 1, 2010, element #27 did include the child's co-payment.

**17. Question:** In my State, we make provider payments based on authorized service hours. This may be different than the actual hours of care that a child received. Should we report the authorized hours for which we pay the full cost of care or the actual hours of care that the child received?

**Answer:** The OCC recognizes that grantees have differing ways of tracking hours. Some grantees collect the *Actual Clock Hours* or *Blocked Hours Based on Attendance* of service provided using attendance records or payment systems. Other grantees track only the hours of service that a family is authorized to receive and do not have the capability to capture the hours of service actually received. Some grantees operate under contracts with providers that ensure payments for minimum amounts regardless of the number of hours of service a child actually receives and may capture only blocks of care – full-time, half-time, etc. These grantees may not track specific service hours received at all.

Recognizing this variation, grantees may report *Actual Clock Hours*, *Blocked Hours Based on Attendance*, *Authorized Clock Hours*, or *Authorized Blocked Hours*. *Actual* or *Authorized Blocked Hours* of care should reflect the upper threshold of the range of hours within each defined block. For example, a CCDF grantee might have a block of hours associated with full-time care spanning 8 to 10 hours for one day of care. In this instance, if a State is unable to determine if the child received 8 or 10 hours of care, they should report 10 hours of care.

Regardless of the type of hours being reported, a CCDF grantee should base their calculations on real numbers retrieved from one of their child care data systems. They should not use averages that are calculated over a series of months.

### III. RESOURCES FOR ADDITIONAL ASSISTANCE

If you have other questions or need more information about the ACF-801 report, there are two primary resources for additional help – the Regional Office Child Care Program Manager for program and policy questions, and the National Center on Data and Technology (NCDT) for general reporting questions.

The Office of Child Care (OCC) is represented by staff in each of the ten administrative regions across the country. You should contact your Regional Office if you have questions regarding your Child Care program policy or operations. Contact information for the **Regional Offices** can be found on the OCC website:

[http://www.acf.hhs.gov/programs/occ/ta/raaddr/program\\_managers.htm](http://www.acf.hhs.gov/programs/occ/ta/raaddr/program_managers.htm)

NCDT works with the OCC to provide technical assistance to all of the State, Territory, and Tribal CCDF Grantees with matters related to the required CCDF data reporting. You can reach NCDT Monday to Friday from 9:00 am – 5:00 pm, prevailing Eastern Time.

Phone (toll-free):	1-877-249-9117
E-mail:	<a href="mailto:ncdt@childcaredata.org">ncdt@childcaredata.org</a>
Fax:	301-692-0700
Mail:	2600 Tower Oaks Boulevard Suite 600 Rockville, MD 20852

APPENDIX 1:  
Revised Monthly Summary Record  
*Revised 6/15/09: 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 2011, this element would be "201104".
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>Filler (formerly Number of children in Pre-K Child Care)</b>	<b>Number</b>	<b>7</b>	<b>Effective June 2009, a Pre-K count no longer is reported on the ACF-801. Rather than make format changes to their data reporting systems, Lead Agencies should report a filler in what was formerly the Pre-K count data element. The filler should be seven zeros: "0000000".</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.
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.

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<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 '201104' for April, 2011.