



Child Care and Development Fund ACF-700 Clarifications

Technical Bulletin #12r Reviewed December 2014

I. Introduction

The purpose of this technical bulletin is to clarify issues related to the ACF-700 reporting requirements and to address some of the questions for which Tribal grantees have sought assistance from the National Center on Child Care Data and Technology (NCDT). The Bulletin focuses on reporting requirements as defined in the *Tribal Annual Report: Guide for CCDF Tribal Lead Agencies* which is available on the Office of Child Care (OCC) website:

<http://www.acf.hhs.gov/programs/occ/resource/tribal-annual-report-guide-for-ccdf-tribal-lead-agencies>.

This Bulletin will be helpful regardless of whether a Tribe uses the *Child Care Data Tracker* software, or prepares their ACF-700 report manually or with another software program. The information is presented in a Question/Answer format. Section III describes how to obtain additional information and assistance.

II. Questions and Answers

Question 1: In addition to providing subsidies to CCDF eligible children, we also use CCDF funds to pay for some quality activities. Should we include all of the children involved in these quality activities on the ACF-700 report?

Answer: No. All of the children involved in quality activities would not necessarily be included on the ACF-700 report. Children should be counted only if they receive direct child care services funded by CCDF. They should not be counted if the CCDF grant paid for quality activities or other indirect activities, like improving the nutritional value of lunches, training staff, or teaching reading skills in an existing program. In these cases, the grant did not pay directly for child care itself.

Question 2: We run our own child care center(s) and do not technically “pay” a provider. How should Tribes report subsidies in these circumstances?

Answer: Amounts spent on the provision of child care services in the Tribally-Operated Center (TOC) should be reported in the average monthly subsidy per child (data element # 6a on the ACF-700). Tribes that operate their own center can estimate the average monthly subsidy per child using the record of expenditures that is submitted annually on the required ACF-696T, the Tribal

financial report. For additional TOC guidance, see Technical Bulletin #14 (available online at: <http://www.acf.hhs.gov/programs/occ/resource/tb14>)

Calculation to estimate the average monthly subsidy per child:

Add the Tribal Mandatory, Discretionary, and Discretionary Funds Base Amount expenditures (*not including expenditures for construction and renovation*) that your Tribe reported on Line 4 of the ACF-696T – Expenditures for Child Care Services. During the fiscal year, if you expended funds from more than one grant year, you must add the appropriate expenditures from each of the reports submitted regardless of the year that the grant was awarded.

Divide the above total by the number of months that you provided services during the year (ranging from 1 to 12 months) to get an overall monthly subsidy amount.

Divide the monthly subsidy amount by the average number of CCDF eligible children served per month (data element #2a) to estimate the average monthly subsidy per child.

Question 3: If a Tribe uses a variety of different types of care (e.g. family home, contracted center based, plus running their own center), how should we report the subsidy amount?

Answer: You should be calculating monthly averages for each different type of care. Detailed instructions for calculating both the total average monthly amount paid for all care types, and the total average monthly amount paid for each care type are included in the *Tribal Annual Report Guide* (available online at: <http://www.acf.hhs.gov/programs/occ/resource/tribal-annual-report-guide-for-ccdf-tribal-lead-agencies>.) Additional details also are included in Technical Bulletin #14 – *Reporting Clarifications for Tribally Operated Centers* (available online at: <http://www.acf.hhs.gov/programs/occ/resource/tb14>).

Question 4: Because co-payments are made directly to the providers, Tribes don't always know whether or not the co-payment is actually made. How should we report this?

Answer: You should report the co-payment that has been defined and assigned by the program without regard to whether it ever is actually paid.

Tribal Lead Agencies should encourage the providers to collect co-payments not only because parental contributions to the cost of child care are required by law, but also because the co-payment helps ensure that providers receive fair-market value for the services they deliver.

Question 5: Often our families' incomes increase or decrease during the course of a year, and their corresponding co-payment may also change. How should Tribes report co-payment on the annual ACF-700 report?

Answer: Tribes should be keeping monthly statistics. The changing co-payments would be reflected in these monthly numbers that serve as the basis for annual calculations.

Question 6: How should Tribes deal with data elements for income, family size and child's age, each of which may change during the year? What numbers should we use when we make calculations for our annual report?

Answer: For these data elements – income (used to calculate data element # 7), family size (used to calculate data element # 7), and child's age (data element # 3) – the ACF-700 annual reports should reflect accurate information as of the end date of the Federal fiscal year for which the report is being generated. If a family/child leaves the program part way through the year, the information should reflect accurate information as of the date when the family/child left the program.

Question 7: A child's living situation may formally change in the middle of a report period. This is a permanent change in where the child resides and with whom the child resides. We have re-determined eligibility and the child continues to be served by our program. How should we report these families/children on the ACF-700 report?

Answer: The way in which you report the families and children on the ACF-700 report depends upon how their living situation changes. For example:

Scenario 1: One or more siblings were living with one parent/guardian. For whatever reason, the parent/guardian can no longer care for the children and all of the children are now living with another parent/guardian. For reporting purposes, the family should be counted only once on the ACF-700 report. Each of the children should also be counted only once. The most recent reason for care along with updated demographic information (such as income, family size, etc.) should be used for this family in calculating the ACF-700 report.

Scenario 2: Several children were living with one parent/guardian. One of the children leaves this living situation and is now living with a different custodial parent/guardian. For reporting purposes, two families should be counted on the ACF-700 report. Each of the children should be included on the ACF-700 report only once in the "total" column. The appropriate reasons for care along with updated demographic information (such as income, family size, etc.) for each of the families should be used in calculating the ACF-700 report.

Question 8: When reporting a family's reason for care, we have situations that do not fit any of the three allowed options (working, training/education, or protective services). For example, we consider job search as an approved reason to receive subsidized care. We also provide subsidies in cases of medical emergency when the parent is temporarily not able to care for the children. What should we do to accurately report these kinds of situations?

Answer: By law, all eligible children must either 1) reside with parent(s) who are working, 2) reside with parents who are in school or other educational program, or 3) receive or need to receive protective services. Therefore all families should be categorized on the ACF-700 report according to one of these three allowed options for data element # 4 (working, training/education, protective services). Usually, there is one primary reason for care that can be documented for the

purposes of the ACF-700 report. For example, if a parent is both working and taking classes at night, you would record the activity at which the parent spends the most time.

Tribes have a degree of flexibility in their CCDF Plans to define certain terminology related to eligibility. For example, some Tribes define “working” to include limited periods of job search. Tribes should document in their Tribal plan, the definitions of eligibility criteria that they include in each of the three eligibility options. These definitions are then subject to review and approval by the Office of Child Care. All families must be included in one of the three legislatively defined eligibility options and, on the ACF-700 report, numbers in data element # 4 a-f must add up to the total number of children served (data element # 2b).

Question 9: We do not collect “income” information for some families. How can we account for those families in data element # 7 – number of children in relation to poverty levels?

Answer: Child Care guidelines direct that grantees are required to gather information about family income. Even though there is no question on the ACF-700 that specifically asks about income amounts, this information is necessary for determining eligibility and for completing data element # 7 on the ACF-700 form which counts children being served whose families are at, below, or above poverty level. The only exceptions would be children receiving care because they are receiving Protective Services and are reported as the “applicant” and in a family size of one (no family income is required for these children).

The OCC has posted annual charts to help you determine which poverty category to relate to a specific income and family size. The charts are available online at: <http://www.acf.hhs.gov/programs/occ/resource/acf-700-tribal-annual-report>. Contact NCDT for more information.

Question 10: We serve several children from the same family all of whom are in Protective Services. Should we report the children as one family unit or report each child separately?

Answer: *Reason for eligibility* is what should determine how to report children in a family. If the family is eligible to receive subsidized services because they are working and meet income limits, the reason for care would be “work” and that child would be reported as a family member along with all of the siblings.

If, however, the reason for eligibility is because the child is in Protective Services (PS) and eligible to receive care based on that PS status, then the child(ren) would be reported as his/her own family with a family size of one (1).

In this case, you would report each child separately. No income would be associated with children reported in this way.

In the case where a family is eligible because they are working, **and** the child also is in Protective Services, the Tribe may choose to report that child either as a

member of the eligible family, or as an independent “family” with a family size of one.

Question 11: Our Tribe operates, and collects data from, several different child care programs at different sites much like Tribal consortia do. How should we combine the data from the programs to produce one annual ACF-700 form?

Answer: NCDT has developed an Excel spread sheet that can help Tribes to combine data on a monthly basis by entering figures from monthly ACF-700 reports from each program. Tribes may contact NCDT to get both this tool and further information about combining and preparing data from multiple sources for submission.

Question 12: When we enter the number of children served in each type of care (data element # 3, Columns B-L), they don’t always add up to the total figure for element #3, Column A – why?

Answer: Children may be served in more than one type of care either concurrently or consecutively. When this happens, the child will be counted under each type of care. Column A is an unduplicated count of the total number of children served regardless of how many types of care they receive. Columns B-L may add up to a figure that is higher than Column A. Columns B-L should never be less than the total in Column A.

Question 13: We calculate different co-payment amounts for each child in the family based on the child’s age and needs. How do we calculate average family co-payments in this situation?

Answer: Even though the ACF-700 requests “family” co-payment, you must calculate this figure on a “per child” basis. Regardless of whether you have a “family” co-payment or co-payments assigned to each child, you calculate the average monthly total co-payment amount parents pay per child for each provider. These individual child or family co-payments can be used to get averages for all children in each care type (Columns B-L), or all children in all care types together (Column A). The Tribal Annual Report Guide contains detailed instruction for calculating co-payments (<http://www.acf.hhs.gov/programs/occ/resource/tribal-annual-report-guide-for-ccdf-tribal-lead-agencies>).

NOTE: If you are using the *Child Care Data Tracker* software, these figures will be calculated automatically when you enter the total monthly co-payment for each family.

Question 14: Our Tribe uses contracts to establish a team of child care service providers that will be available to the children in eligible families. Not all of these contracted providers maintain records on the families and children they serve. How should we report families in these circumstances?

Answer: The legislation, as well as the Office of Child Care guidance, directs grantees that they must gather information on all children that are being served totally or in part with CCDF funds. Maintaining adequate records and providing required data should be a condition for providers to participate in the subsidy system. Some Tribal grantees require participating providers (even those receiving vouchers) to sign an agreement setting forth their reporting obligations.

III. Where to Get Additional Information and Assistance

If you have additional questions or need more information, there are two primary resources where you can obtain help – your Regional Office Child Care Program Manager, and the National Center on Child Care Data and Technology (NCDT).

The Office of Child Care (OCC) is represented by staff in each of the ten administrative regions across the country. OCC Program Managers can help you with programmatic and policy questions. Contact information for the **Regional Offices** can be found on the OCC website: <http://www.acf.hhs.gov/programs/occ/resource/regional-child-care-program-managers>.

NCDT works with the OCC to provide technical assistance to all of the Tribal, Territory, and State CCDF grantees with matters related to the required CCDF data reporting. You can reach NCDT either by phone at the toll free number (1-877-249-9117) or by e-mail at ncdt@childcaredata.org.