

Webinar 3: Comments and Questions

Comment: The lack of a federal preprint does not prevent the state from sharing a draft.

DECCD Response: DECCD made the link to the federal draft preprint available in each webinar and follow up email. This link was also posted on DECCD's website for access.

Question: Please provide the options you shared orally in writing to this group.

DECCD Response: Please clarify which options are being requested.

Comment: For the record, I wish to say that low-income families in low wage jobs will never be able to afford full care and HHS and MDHS should know that. This is an adverse policy for the working poor in the name of so-called quality.

Question: how much CCDBG money is currently being spent on quality?

DECCD Response: Please clarify if this question is in regard to the amount spent across CCDBG or if the question is more specific. This is a request for information rather than a question regarding the state plan or the plan process. Individuals may submit a public records request by sending an email to communications@mdhs.ms.gov. The agency tracks all public records requests to ensure legality, accuracy, and compliance with response times.

Question: Is this [redetermination] separate from TANF changes for a parent?

DECCD Response: TANF families are not subject to DECCD redetermination processes.

Question: will you require interim reporting within the 12 month period?

DECCD Response: DECCD will only conduct parent redeterminations every 12 months.

Question: Will you make public a list of who is on the webinar or at least what sectors are represented on the webinar?

DECCD Response: The breakdown of participants for this webinar is as follows:

- Advocacy – 1 participant
- Private Foundation – 1 participant
- Licensed Child Care Provider – 14 participants

Question: How do you handle the priority populations?

DECCD Response: The U.S. Department of Health and Human Services requires states to serve certain populations at a high priority (ex. homeless children), or as an entitlement (ex. TANF clients). States have the discretion to identify other populations that should be served at a given priority level. Mississippi has determined that a some of the population should be served on referral and at a higher priority than others due to the high numbers of risk factors that have been associated with these populations including foster children, children of teen mothers in high school, and those that have a collection of risk factors and are enrolled through the federal home visiting program, etc.

An explanation of the priority levels is available on the DECCD website: <http://www.mdhs.ms.gov/early-childhood-care->

[development/for-parents/child-care-certificate-program/priority-groups/](#)

Question: Is it also the consideration of state policy makers to reduce the assistance such low-income families now receive in order to attempt to serve the same number of children while increasing grants for quality? If so, will you be providing an Economic Impact Statement?

DECCD Response: States have been required by the 2014 Reauthorization to make greater investments in quality activities and program oversight processes such as monitoring providers. At this time, the state's allocation of funds has not increased. DECCD will make every effort to judiciously allocate limited resources in order to comply with federal regulations and to meet the needs of our clients.

Any future policy changes proposed by DECCD will be presented to the Attorney General's Office for review. DECCD will follow the instructions provided by legal counsel regarding program performance and the requirement of any Economic Impact Statement.

Question: How frequently do parents have to be redetermined?

DECCD Response: Parents are redetermined annually. However, TANF, TCC, and HHM are exempt from redetermination.

Q: The new regulations call for states to minimize interruptions in service or obstacles, so the state should eliminate the child support requirement because it is a deterrent to parents who need child care. Child support is not required for Head Start of PreK, so it should not be required for child care.

DECCD Response: The MDHS requires public assistance beneficiaries to cooperate with Child Support in an effort to support the financial stability of single parents. At the direction of the agency, DECCD has no plans to remove this requirement. There are specific situations where a parent can be exempt for cooperation with Child Support on the basis of good cause. Please see DECCD Policy Manual Section 102.03(2)(E)(iii).

Question: I have a parent who has had a pending status for over 3 months. Why do you think that is?

DECCD Response: DECCD has expended all available funding that this time. Due to the availability of funding, families who have been placed on the pending funding list will remain on the list until such time as funds become available. DECCD is unsure of how long this list will remain in effect.

Upon submission of an application for child care services, a parent will receive official notification that they have been placed on the Pending Funding list within 10 business days, however there is no way to predict how long the parent may remain on that list. DECCD will not make a full eligibility determination regarding a parent who has been placed on the Pending Funding list until such time as funds become available.

Question: I know the list but it has 9 priority populations. My question is whether you handle each population as its own payment program? When and how do families move from one to another?

DECCD Response: An explanation of our priority populations is available on the DECC website at the following address:
<http://www.mdhs.ms.gov/early-childhood-care-development/for-parents/child-care-certificate-program/priority-groups/>.

Families may move between priority populations based upon eligibility criteria and the information received from their caseworker or as a result of parent redetermination as long as they do not exceed the published income limits for 85% of SMI.

If by “own payment program” you mean that there is an established number of slots or a specific amount of funding for that particular population, then the answer is no.

DECCD makes funding decisions based on the number of children (regardless of priority population) that DECCD has the ability to serve.

Question: How frequently do families have to update their information?

DECCD Response: Currently, and as stated in the provider statement of agreement (Policy Manual Appendix J), parents are required to inform DECCD within 10 days of any changes in their income, address, phone number, or child care provider. These changes are self-reported, however it is critical that DECCD have up to date information (especially contact information) so that our office can communicate with the family regarding any change in their certificates or the certificate program. Failure to communicate with DECCD regarding a change in provider will result in a delayed effective date and a delayed payment to the new provider. DECCD will be removing “Income” as a requested item due to 12 month redetermination.

Question: How are you going to increase access to homeless if you can't serve all the currently eligible?

DECCD Response: DECCD is required to comply with new provisions of the CCDBG regarding access to childcare services for

homeless families. DECCD recognizes that there is great need for subsidized childcare assistance across the state, and will make every effort to judiciously allocate available resources to comply with federal regulations and meet the needs of existing and potentially eligible clients.

Question: Has the SMI been updated because the last time check minimum wages was less than what its now? Will that be revised if so when?

DECCD Response: DECCD is in the process of re-assessing our policies to align with the updated SMI. The deadline for implementation is October 2016.

Question: How many families are currently on the pending funding list for all priority populations?

DECCD Response: This is a request for data rather than a question regarding the state plan or the plan process. Individuals may submit a public records request by sending an email to communications@mdhs.ms.gov. The agency tracks all public records requests to ensure legality, accuracy, and compliance with response times.

Question: This parent has an emergency need. She attends school and is having to take her child to different people.

DECCD Response: Any question regarding the eligibility of a particular applicant should be addressed to our Communications Unit: 1-800-877-7882. However, all applicants should be advised that a pending funding list is in effect for certain priority levels.

Question: Further, if you cannot release your pre-print draft, perhaps this writing process is legally premature and/or the MSDH policies

recommended therein and overall are extremely adverse to low-income families and those who serve them.

DECCD Response: The purpose of the webinar series is to solicit feedback from stakeholders while DECCD is still in the process of developing the Mississippi State Plan. There is no DECCD draft to share at this time. After soliciting input from providers through this webinar series, the DECCD draft Plan will be written and made publicly available for comment.

Comment: I think review the income monthly would be great

Comment: HHS requires that States must now conduct a needs assessment of the state's child care quality needs and align their quality options with the assessment results.

In what way will you be conducting that needs assessment?

DECCD Response: DECCD is awaiting final program instruction related to this item before this process will be addressed.

Is it your purpose to use the "polling" questions from your webinars to serve as a proper and HHS required needs assessment? When do you plan to explain the purpose of YOUR POLLING QUESTIONS and how they will be used? Do you feel it would be Professionally Ethical to use unexplained, pre-determined "Polling Questions" to satisfy the HHS requirement for a Needs Assessment without informing webinar participants that they are being used in this way?

DECCD Response: DECCD is using the polling feature within the webinar as an additional opportunity for provider input

to be recorded during the Mississippi State Plan development process. The poll responses will be used to inform this process.

If so, haven't you already "pre-determined" that further, additional funding will go towards further additional technical assistance and training to preferred academia for such as the identification of homeless families rather than to increase the supply of quality infant and toddler care?

DECCD Response: DECCD is required to increase training and technical assistance and training in order to comply with 2014 Reauthorization requirements. DECCD is also required to serve homeless families and support increased supply in infant and toddler care. DECCD is attempting to seek provider input on how best to comply with all of these items.

When do you plan to either provide the draft from which you are working or postpone these sessions?

DECCD Response: DECCD has provided the link to the current federal draft at each webinar, follow up email and on the DECCD website.

When do you plan to identify all who have worked with you already to pre-determine what will and will not be fully disclosed to the public in the course of these "writing webinars" of the State Plan? Did your decision to only disclose, in your webinars, the changes you feel we have the right to know

include face to face input from any low-income parents or low-income providers?

DECCD Response: The only sessions that have been held related to the Mississippi Plan are the public webinars. DECCD is reflecting the changes in the Plan document, and is not omitting changes. If more information is needed, DECCD will be happy to respond.

Comment: <http://www.ncsl.org/research/human-services/2014-ccdbg-reauthorization-act-implications-and-opportunities-for-state-legislatures.aspx>

State Flexibility

While the bill is more detailed and provides much more guidance than before, it does provide for state flexibility in the areas of setting provider payment rates and quality options. [Specifically, states will have flexibility on whether to continue to conduct the standard market rate survey to set provider payment rates or use a cost-estimation model \(a possible 'truer' cost of care\)](#), which is being considered or used in a few states. Another area that allows for state flexibility is the statute's explicit authority for states to continue to create tiered reimbursement policies. According to the 2012-2013 CCDF Plans, 32 states and territories indicated that they provide tiered or differential rates for higher quality.

Parental choice is also a significant part of the reauthorization. Families who receive a child care subsidy

may choose from a mixed delivery system: center-based or home-based-care. States must also allow parents to choose care that is contracted through the state or receive a voucher that they can use at any licensed center or registered family child care home.

States also have options in terms of the quality set-aside. States must conduct an assessment of the state's child care quality needs and align their quality options with the assessment results. Using the results from the needs assessment, states must choose at least one of the following:

- Training and professional development.
- Improvement of early learning guidelines.
- Implementation of a quality rating system.
- Improving the supply and quality of infant and toddler care.
- Expanding resource and referral services.
- Facilitating state licensing compliance.
- Evaluating child care programs' effectiveness, including positive impacts on children.
- Supporting voluntary accreditation.
- Supporting quality health, physical activity and nutrition standards in child care settings.
- Any other quality improvement activity that can be measured.

Waiver

At a state's request, the Secretary of HHS could approve a three-year waiver of CCDBG requirements or a provision if there is a conflicting or duplicative CCDBG requirement

identified by a state; if a state has extraordinary circumstances, such as a natural disaster or financial crisis; or if the state legislature is unable to act in a timely way to implement a provision to comply with the law. Such a waiver request must show it would contribute to the state's ability to implement the law and not add to inconsistency with the law's objectives.