

Proposed Bill No. 112
Elm City Communities Testimony
March 2, 2016

Elm City Communities/Housing Authority of the City of New Haven (ECC/HANH) respectfully submits testimony in support of Proposed Bill No. 112, *“AN ACT PROVIDING CHILD CARE FOR ASSISTANCE RECIPIENTS ENROLLED IN APPROVED HIGHER EDUCATION PROGRAM.”*

Last legislative session we worked with the Service Employees International Union (SEIU) and All Our Kin on requesting legislative changes that would create efficiencies to the Care 4 Kids program and provide greater benefits for Connecticut families. Proposed Bill No. 5357 (LCO No. 3728), Proposed Bill No. 956 (LCO No. 3978), and Raised Bill No. 1044 (LCO No. 4390) all, unfortunately, failed to pass but we applaud the Committee for their incredible persistence.

We are pleased that Proposed Bill No. 112 includes 2- and 4-year higher education within the definition of employment-related activities in Care 4 Kids. However, we hope the Committee will consider additional changes, which were raised last legislative session. Specifically, we’d like the Committee to consider the extension of the Care 4 Kids redetermination period from eight months to one year, which falls in line with the 2011 federal Office of Child Care recommendationsⁱ and proposed rulemakingⁱⁱ that states **adopt a 12 month redetermination period** in order to improve children’s continuity of care. Twelve-month eligibility has three advantages: first, children benefit from the stable care that research has demonstrated is essential for healthy development;ⁱⁱⁱ second, fewer eligible families are excluded from the program because of administrative burdens associated with redetermination; and third, reduced redetermination frequency minimizes costly churn of parents cycling in and out of the program.^{iv}

We strongly encourage the Committee to revisit the language developed last year that included **collaboration requirements** with the Departments of Social Services, Developmental Services, Mental Health and Addiction Services, Children and Families, as well as Public Health. Such collaboration could **streamline the documentation process for establishing eligibility**. Burdensome documentation requirements at the point of entry to Care 4 Kids are a barrier to eligible families seeking to access benefits. Since many families are enrolled in multiple benefit programs simultaneously, where possible, we believe that documentation should be shared among government programs in which families may be enrolled. For instance, parents who already have information stored in the Department of Social Services System should have that information automatically transferred to their Care 4 Kids program file. Such information-sharing would ease the burden of applying for many eligible families and reduce processing times for all families in the system because of increased efficiency. By eliminating redundancy, such a change also is likely to create substantial cost savings.

Additionally, we hope that collaboration will lead to the **introduction of presumptive eligibility**. We would like the Care 4 Kids system to include an expedited path for parents whose circumstances suggest that they will qualify for care. Following their initial showing of need, perhaps through submission of income tax forms, parents should have a grace period of thirty days during which they receive child care subsidies to provide full documentation of their need. Having access to child care for those thirty days will help unemployed parents succeed in their job searches and secure stable employment and help employed parents maintain their jobs. The State also could experiment with allowing parents who have already demonstrated their eligibility for another benefit program, such as SNAP, Section 8, and public housing, to be presumed eligible. North Carolina, for instance, made

eligibility for SNAP benefits presumptive proof of income eligibility for child care subsidies. This method would provide the immediate and necessary supports for parents seeking child care for employment as well as educational purposes. In addition to benefiting low-income families, it is estimated that this policy change saves 15-20 minutes in each parent interview.^v

Maximizing the benefit allows a wider net of families to take advantage of Care 4 Kids, thus creating a more equitable State program. To this end, we strongly encourage the Committee to consider the following policy recommendations:

Allow for a broad definition of “vulnerable populations” within the protective services category. This category has recently been expanded to include children who are participating in Early Head Start-Child Care Partnerships; we would like the program to be expanded to include all children in Head Start or Early Head Start and their siblings, as well as homeless children. Income and employment requirements could be waived for these families, and in some cases, reducing administrative burdens and making it easier for families to access care for vulnerable children.^{vi}

Eliminate the requirement that subsidized child care hours match parent’s work hours. Currently, children whose parents have irregular or limited work or training hours receive subsidies only for care during matching hours of the day—a child of a school bus driver might only receive subsidies covering two hours of care in the morning and two hours in the afternoon, for example. Because most providers must fill their child care spaces with full-time children, in practice children who receive limited hours of subsidized care often have limited care options. These matching hours also need to be revisited because many of the parents who use Care 4 Kids, particularly parents receiving assistance from the U.S. Department of Housing and Urban Development, rely on the public transit system, and bus schedules make it difficult to transport children to care during matching hours. If it is possible for collaboration among State departments to include the Department of Transportation, we urge the Committee to consider this. In addition, this system imposes taxing documentation requirements on parents.^{vii} The State could alleviate this problem by allowing the subsidy to be used for hours that best support children’s healthy development, rather than merely for hours when parents are working.

Connecticut’s child care subsidy program, Care 4 Kids, is a lifeline for our state’s working families. The hand-up that it provides families supported by ECC/HANH is invaluable and while we hope more funds may be added to Care 4 Kids in the future, we understand the financial constraints of the present. We urge the Committee to review any and all language changes to Care 4 Kids that would reduce the number of our state’s most vulnerable residents from being able to receive this important child care subsidy before taking action on such a bill. We thank the Committee for their thoughtful consideration of our policy recommendations.

ⁱ HHS ACF, Office of Child Care (OCC). 2011. “Policies and Practices That Promote Continuity of Child Care Services and Enhance Subsidy Systems, 2011.” CCDF-ACF-IM-2011-06. Washington, DC: HHS ACF OCC. <http://www.acf.hhs.gov/programs/occ/resource/im2011-06>.

ⁱⁱ “Child Care and Development Fund Program: A Proposed Rule by the Health and Human Services Department on 05/20/2013.” Federal Register. <https://www.federalregister.gov/articles/2013/05/20/2013-11673/child-care-and-development-fund-ccdf-program>.

ⁱⁱⁱ Adams, Gina, and Monica Rohacek. 2010. “Child Care Instability: Definitions, Context, and Policy Implications.” Washington, DC: The Urban Institute. <http://www.urban.org/publications/412278.html>.

^{iv} Adams, Gina, and Hannah Matthews. 2013. “Confronting the Child Care Eligibility Maze.” Washington, DC: The Urban Institute and CLASP. <http://www.urban.org/UploadedPDF/412971-confronting-the-child-care.pdf>.

^v Ibid.

^{vi} Ibid.

^{vii} Adams, Gina, and Hannah Matthews. 2013. “Confronting the Child Care Eligibility Maze.” Washington, DC: The Urban Institute and CLASP. <http://www.urban.org/UploadedPDF/412971-confronting-the-child-care.pdf>.