



Minnesota Department of Human Services
Child Care Assistance Program
P.O. Box 64962
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June 8, 2018

Administration for Children and Families
Office of Planning, Research and Evaluation
330 C Street SW
Washington, DC 20201
Attn: ACF Reports Clearance Officer

TITLE: Proposed revisions to the Child Care and Development Fund ACF-801 Child Care Monthly Case Record Form and Instructions

Thank you for the opportunity to comment on the proposed revisions to the Child Care and Development Fund ACF-801 Child Care Monthly Case Record Form and Instructions. The Department of Human Services (DHS) is the designated lead agency for CCDF in Minnesota. DHS supervises the local agencies that provide services to eligible families, collects data and reports to the Department of Health and Human Services.

Specifically, Minnesota will comment regarding the two new data elements and proposed revisions to the ACF-801 that allow ACF to collect whether or not providers charge the difference, and if so, the amount charged per child by those providers in instances where the provider's price exceeds the subsidy payment. Based on our experience with the current ACF-801 Child Care Monthly Case Record Form and Instructions and our review of the proposed ACF-801 Child Care Monthly Case Record Form and Instructions, we are submitting the following comments for consideration:

1. Collection of Information Necessary and Practical Utility of Information

Minnesota does not currently collect information on the difference that is charged to families by providers when the provider's price exceeds the subsidy payment. A survey is planned to collect this data statewide, but adding this burden to each provider for each billing cycle is a significant change. In Minnesota, providers bill their usual and customary charge but are unsure of the exact payment amount they will receive at the time of billing. The payment amount is dependent upon many factors, such as age of child, and CCAP payment policies. When submitting the billing form,

providers would need to estimate the amount they are going to charge families and it may not be what is actually charged. This will likely result in inaccurate data being reported.

2. Estimate of Burden

Adding these data fields to the ACF-801 report would add considerable burden for the state, counties and providers because:

- a. Minnesota doesn't currently collect this data and would need to revise the following:
 - i. Child Care Assistance Program paper billing form. Because this form is generated within Minnesota's payment system, this requires IT services.
 - ii. A new field within the eligibility and payment system for workers to enter the data, which requires IT services.
 - iii. A new field within the electronic billing software for providers billing electronically to enter the data, which requires IT services.
 - iv. New fields would be required in our data warehouse in order to report on the ACF-801, which requires IT services.

Note: All of the above items will take significant time for program staff and IT staff. These will incur costs to the program, including IT staff time, printing and possible added postage, due to expansion of the questions asked of providers.

- b. Minnesota would need to provide instruction to providers to assure they are reporting accurately.
- c. Minnesota would need to provide instruction to local agency workers to assure they are capturing and entering the data correctly.
- d. Additional reporting requirements for providers may dissuade providers from continuing to serve CCAP children. The amount of the difference charged per child, per billing period, is a challenge to calculate and will add significant time to each bill submitted for CCAP.

3. Quality, Utility and Clarity of the Information to be Collected

The current ACF-801 requires reporting of the total monthly child care co-payment (family level information) and total monthly amount paid to provider (child level information). Copayments in Minnesota are assessed at the family level. Responses to the following questions will help clarify the intent of the reporting requirements:

- a. Please clarify what level of information would be requested for the amount charged to the family when the provider's price exceeds the subsidy payment. Would this data element be at the family level for all children or at the child level?
- b. Some providers charge the difference only for certain age groups. If the data element is identified at the family level, how would providers and the state report this type of situation?

- c. In some instances, such as early learning scholarships, the provider receives payment for the amount of the provider's price above the child care assistance payment from a third-party source. How should payment by a third party source be reflected in the reporting?
- d. The quality of the data would be compromised if providers did not report the information. Current policy does not allow for MN to withhold payments if a provider does not respond to or report information that is not necessary in order to make payment. How would the state report information on the ACF-801 in the situation when the provider does not report the data?

4. Ways to Minimize the Burden

- a. Allow states to collect this data annually via a survey for each provider paid using CCDF.
- b. If per family information is deemed necessary, reporting requirements should include only identifying whether or not the provider charges the difference to the family and not require an amount. Allow states to identify an estimate of the amount the providers could charge families rather than what was actually charged. Minnesota could collect information about the amount in a separate survey and update that periodically.
- c. Allow states one year lead time to implement any changes to the ACF-801 reporting.

Minnesota welcomes the opportunity to continue to work in partnership with the Office of Child Care to support and improve efforts in this area that strategically invest limited resources to support the most efficient and effective use of public funds. We are very concerned about the impact of this requirement on families. Providers paid by this program already have a significant amount of paperwork and reporting; this will be perceived as burdensome and a barrier to serving families.

If you have questions please contact me at 651-431-3828, or email me at cindi.yang@state.mn.us.

Sincerely,



Cindi Yang
Director
Child Care Services Division
Minnesota Department of Human Services
State Administrator

