

DAVID Y. IGE  
GOVERNOR



PANKAJ BHANOT  
DIRECTOR

CATHY BETTS  
DEPUTY DIRECTOR

STATE OF HAWAII  
**DEPARTMENT OF HUMAN SERVICES**  
P.O. Box 339  
Honolulu, Hawai'i 96819

May 2, 2018

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

Dear Mr. Robert Sargis:

Subject: Comments on the Child Care and Development Fund, Quarterly Case Record Report (ACF-801), OMB No.: 0970-0167

The Hawai'i Department of Human Services (DHS) appreciates the opportunity to respectfully submit the following comments in response to the Federal Register Notice of Proposed Information Collection Activity for the Child Care and Development Fund (CCDF), Quarterly Case Record Report (ACF-801), OMB No.: 0970-0167, released on April 13, 2018, by the U.S. Department of Health and Human Services (HHS) through the Administration for Children and Families (ACF).

ACF is proposing to add two new data elements to the existing reporting requirements: a new data element 30.a., which specifies the Monthly Amount Charged Above Copayment (enter numeric value rounded to the nearest dollar), and a new data element 41, which indicates Provider Charges More Than Copayment (No, Yes, or NA).

Ensuring access for families receiving CCDF subsidies to a wide-array of quality child care providers is an important component of one of the purposes of the federal CCDF grants. Having sufficient choice of child care providers that meet the needs of the family and their children that also provide quality early care and child development services are imperative to supporting families on their path to successful, long-term self-sufficiency. The health and safety of children receiving child care and improving their quality of care are paramount for Hawai'i's DHS, which oversees the child care subsidy and child care licensing programs. Parents need to have peace of mind knowing that their children are safe, and must feel confident in their child's early care environment. We stand in unison with ACF on these principles.

AN EQUAL OPPORTUNITY AGENCY

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However, we generally find that the proposed data element 30.a. to be potentially burdensome if not potentially inaccurate, since Hawai'i DHS pays the child care subsidy to the family. The child care provider completes the form confirming the information for the provider, including the cost of care, once every twelve months, unless there are changes during those twelve months to the provider or to the cost of care. It would be unreasonable to shift the burden to our families by expecting and requiring them to report this information to Hawai'i DHS during their twelve month eligibility period.

Therefore, the Monthly Amount Charged Above Copayment may be accurate only at the time of the initial determination or at redetermination, but it may actually be less than the figure that would be reported by Hawai'i DHS, since the subsidy family may apply for and receive additional privately-funded scholarships through foundations or any faith-based organizations that may sponsor the child care center. Hawai'i is fortunate to have a variety of private foundations that recognize the high cost of living in Hawai'i, including the cost of child care, and provide generous scholarships to families to reduce the additional cost of child care above what the DHS child care subsidy covers. However, most of these privately-funded scholarships require families first to apply for the DHS child care subsidy and then additional scholarships may be awarded based on the cost the family must cover above the DHS child care subsidy.

Access to high-quality child care is an essential component to achieving gainful employment and independence and improving child well-being. Parents need to have the ability to access safe and affordable high-quality child care so they can maintain employment and at the same time, their children can be school ready and prepared for life and the workforce as adults with essential skills. However, improving access and quality must be in balance, work in tandem and require a shared investment from federal and local state government.

Hawai'i DHS feels that only reporting on the proposed new data element 41 would be appropriate and possible with the information provided by the families' child care providers at initial determination and redetermination. Hawai'i DHS may not have accurate information to report on for the proposed new data element 30.a., therefore we prefer not to report inaccurate data that may be used for data analysis that could lead to inaccurate findings. Alternatively, Hawai'i DHS requests that the proposed data element 30.a. be reported at the jurisdiction's option, and Hawai'i DHS could include the data only for families who have initial determination or redetermination completed within the report month of the ACF-801 report when the cost of care has been verified in that report month.

Meaningful child well-being and family outcomes with long-term impact are tied to adequate, available and intentional funding. It is critical that ACF recognize the potential for inaccurate data to be reported with the proposed data element 30.a. if mandated by ACF, given that the CCDF grants are block grants that allow for state flexibility to determine its operation of the program. Hawai'i DHS chooses to continue to pay the subsidy to the family

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as it reinforces parental choice, allows for the high utilization of legally exempt care within Hawai'i which is needed due to many families have varying work schedules (nights and weekend shifts) in the tourism and retail industries as well as due to our diverse cultural values, and provides for the staffing levels that Hawai'i DHS has been provided by the Legislature for the child care subsidy and child care licensing programs.

Federal agencies, including the ACF, have in the past allowed states to develop their own solutions to meet federal standards, knowing that effective and efficient systems can be devised to adapt federal standards to local conditions. In submitting these comments, we are requesting that the approach taken in these data reporting be considered as optional for the proposed data element 30.a. to avoid potentially inaccurate data being reported and used for data analysis and evaluation.

If you have any questions regarding this subject, please contact Scott Nakasone, Acting Administrator of the Benefit, Employment and Support Services Division by phone at (808) 586-5230 or by e-mail at [snakasone2@dhs.hawaii.gov](mailto:snakasone2@dhs.hawaii.gov).

Sincerely,



Pankaj Bhanot  
Director