



**American Indian and Alaska Native Child
Care and Development Fund**

A Guide for New Administrators

CCDF Administration Series



ADMINISTRATION FOR
CHILDREN & FAMILIES



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Introduction

The Personal Responsibility and Work Opportunity Reconciliation Act of 1996 consolidated funding for child care under section 418 of the Social Security Act (42 U.S.C. § 618) and made such funding subject to the requirements of the Child Care and Development Block Grant (CCDBG) Act of 1990, as amended. The U.S. Department of Health and Human Services (HHS) subsequently designated the combined mandatory and discretionary funding streams as the Child Care and Development Fund (CCDF) program. The CCDBG Act is the law (along with Section 418 of the Social Security Act) that authorizes the federal child care subsidy program known as the Child Care and Development Fund.

In November 2014, the CCDBG Act of 2014 was signed into law. The CCDBG Act reauthorized the CCDF program and introduced sweeping statutory changes to improve the health, safety, and quality of child care and provide more stable child care assistance to families. The CCDBG Act continues to require HHS to develop minimum child care standards for American Indian and Alaska Native (AI/AN) programs and organizations receiving CCDF funds.

In September of 2016, the Office of Child Care published a final rule to provide clarity on how to implement the law and administer the program in a way that best meets the needs of children, child care providers, and families. It has been more than 18 years since HHS last issued comprehensive child care regulations, and during that time we have learned more about the impact high-quality child care can have on young children's development and learning.

The Child Care and Development Fund is a key resource to help increase the availability, affordability, and quality of child care services. American Indian and Alaska Native CCDF Administrators work each day to ensure that children and families in tribal communities receive the child care services that best meet their needs. With CCDF funding, CCDF Administrators can support low-income families who are working or participating in education or training activities with help paying for child care and improving the quality of child care for all children.

The major provisions of the law include the following:

- ◆ **Protect the health and safety of children in child care.** The final rule details how the health and safety standards established in the CCDBG Act of 2014 apply to AI/AN grantees, including health and safety training, comprehensive background checks, and monitoring of child care providers.
- ◆ **Help parents make informed consumer choices.** The final rule expands consumer education available to parents, the public, and child care providers—including requirements for filing complaints, accessibility of monitoring reports, and providing information about best practices in child development.
- ◆ **Support equal access to stable child care for children from low-income families.** New requirements in the final rule provide minimum time periods of child care assistance to families and strengthen payment rates and practices to promote access to care.
- ◆ **Enhance the quality of child care.** The final rule increases the share of funds directed toward quality improvement activities, including a new set-aside for quality infant and toddler care, and requires training and professional development for caregivers, teachers, and directors working in child care.

The new law enhanced the statutory purposes of the CCDF program, resulting in a better balance between the dual purposes of promoting children's healthy development and school success, and of supporting parents who are working or engaged in training or education.

The Office of Child Care

The Office of Child Care (OCC), Administration for Children and Families (ACF), HHS, administers CCDF at the federal level and provides support and guidance to AI/AN CCDF grantees in designing child care subsidy

programs that are child focused, family friendly, and fair to providers. These child care subsidy programs serve children from birth through age 12 through all sectors of the early childhood and school-age fields. OCC's aim is to integrate child development goals and family self-sufficiency goals to promote increased stability and higher-quality services that lead to improved child and family outcomes. The OCC Regional Program Managers located in each ACF regional office¹ are integral partners of tribal, state, and territory Lead Agencies in the administration of CCDF funds. These Regional Program Managers and their staff members work with AI/AN grantees as the primary federal point of contact for CCDF administration.

Training and Technical Assistance for AI/AN Grantees

Throughout the year, AI/AN CCDF Administrators have various ways to connect, share, and learn from each other. The National Center on Tribal Early Childhood Development (NCTECD), a service of OCC, conducts training and provides technical assistance (TA) through consultation, peer learning groups, webinars, onsite visits, and written resources.

- ◆ NCTECD may provide targeted or tailored technical assistance to new CCDF Administrators to give them support as they transition into their new role.
- ◆ NCTECD regularly develops publications to showcase innovative AI/AN CCDF program initiatives so these successes and strategies can be adopted by other interested tribes.
- ◆ NCTECD has resources available with in-depth information on all the content areas of CCDF administration (health and safety, quality improvement, leadership, coordination, equal access, stable financial assistance, and financial management), as well as the CCDF final rule.
- ◆ NCTECD supports the Peer Learning and Leadership Network (PLLN), a TA opportunity that can build skills and leadership capacity through peer-to-peer activities, mentorship opportunities, and child care communities of practice. This group consists solely of past and present AI/AN CCDF Administrators.

The biennial National American Indian and Alaska Native Child Care Conference² and regional cluster trainings are designed as opportunities for targeted training in areas of CCDF implementation. The workshops and trainings provide opportunities to learn from expert trainers as well as from experienced AI/AN CCDF colleagues.

Technical Assistance Materials Are Available to Support CCDF Implementation

- ◆ Office of Child Care: <https://www.acf.hhs.gov/occ>
- ◆ National Center on Tribal Early Childhood Development: <https://childcareta.acf.hhs.gov/centers/national-center-tribal-early-childhood-development>
- ◆ Early Childhood Training and Technical Assistance System: <https://childcareta.acf.hhs.gov>
- ◆ Early Childhood Learning and Knowledge Center: <https://eclkc.ohs.acf.hhs.gov>
- ◆ Tribal Early Childhood Research Center: <http://www.ucdenver.edu/academics/colleges/PublicHealth/research/centers/CAIANH/trc/Pages/TRC.aspx>

¹ A list of OCC regional offices is available in appendix B.

² Information about this and other national conferences of interest to AI/AN CCDF Administrators can be found on the NCTECD website at <https://childcareta.acf.hhs.gov/centers/national-center-tribal-early-childhood-development>.

Purpose of Guide

AI/AN CCDF Administrators and staff working with federal grants must be fully knowledgeable of all applicable federal requirements and skilled in applying these requirements to the daily operation of their programs, whether they are starting a new program or striving to maintain a quality program that meets the intent of the enacting legislation. It is the responsibility of AI/AN CCDF Administrators to identify the regulations and other requirements that apply to the programs they administer.

This guide provides a basic orientation to the AI/AN CCDF program, including an overview of CCDF law and regulations. Footnotes in each section point to sources of additional information, including guidance documents disseminated by the Office of Child Care and specific sections of the federal regulations that govern the CCDF program. This guide is part of a series of guides and tools to support the effective implementation of the CCDF program.

Important Notice: Please Read before Using This Guide

This guide was developed to provide general information for those overseeing AI/AN CCDF programs. AI/AN CCDF Administrators and fiscal staff should always consult the regulations and current CCDF guidance for the most comprehensive and up-to-date information on the fiscal management of AI/AN CCDF programs. When questions of policy arise, representatives of the Office of Child Care's regional offices should be consulted; policy determinations from the Office of Child Care supersede any information provided in this guide.

AI/AN Child Care and Development Fund Administration

The CCDBG Act of 2014 provided opportunities to offer flexibility to tribes in certain areas to address their unique needs. In addition, the CCDF final rule released in 2016, which supports implementation of the CCDBG Act of 2014, details CCDF requirements to protect the health and safety of children in child care, help parents make informed consumer choices, provide equal access to stable care for children from low-income families, and enhance the quality of child care.

Eligibility for CCDF Funds

AI/AN grantees must meet the following requirements in order to qualify for CCDF funds:

- ◆ Tribes must be federally recognized and the tribal population must include at least 50 children under age 13 living on or near the reservation or service area (the reservation requirement does not apply to tribes in Alaska, California, and Oklahoma).
- ◆ Tribes that do not have reservations must establish service areas in reasonably close geographic proximity to the area where the tribe's population resides. ACF will not approve an entire state as a tribe's service area.
- ◆ Tribal grantees must designate a Lead Agency to apply for funding and be accountable for administering the CCDF program. Within the broad framework of federal regulations governing the CCDF program, the Lead Agency has considerable flexibility in administering and implementing the child care program, determining the basic use of the funds, and identifying spending priorities based on the unique and specific needs of the AI/AN children and families in the tribal community.
- ◆ A tribe with fewer than 50 children under age 13 may participate in a consortium of eligible tribes.

Eligibility for CCDF Funds for Consortia

In order to be eligible to receive CCDF funds on behalf of its member tribes, a consortium must consist of tribes that meet the eligibility requirements for the CCDF program or that would meet the eligibility requirements if they had at least 50 children under age 13. In addition, the consortium must demonstrate that it has current authorization from each participating tribe to receive CCDF funds on behalf of the tribe.

Membership Changes

It is the responsibility of a tribal consortium to notify ACF of any changes in its membership for CCDF funding purposes during the approved CCDF Plan period. For example, if a new tribe joins a tribal consortium to receive FY 2018 CCDF funds, or if a current tribal consortium member elects not to receive FY 2018 CCDF funds through that tribal consortium, these changes must be conveyed to ACF in writing by the tribal consortium.

Types of CCDF Administration

AI/AN CCDF programs can be administered in one of two ways: (1) through the traditional grantee process through ACF and OCC, or (2) through consolidation of CCDF with other employment and training funding sources under Public Law (P.L.) 102–477 (the Indian Employment, Training and Related Services Demonstration Act), through the U.S. Department of the Interior.

Much of the information in this document focuses on the first option, the traditional method of AI/AN CCDF administration. Because consolidation of CCDF under Public Law 102–477 involves a different plan and reporting requirements, programs operating under this law should refer to guidance and instructions from the Department of

the Interior before reviewing the rest of this document. If you are unsure about which administration mechanism your CCDF program uses, please contact your regional office.

Public Law 102-477

The Indian Employment, Training, and Related Services Demonstration Act of 1992, as amended (P.L. 102–477), was enacted to do the following:

- ◆ Demonstrate how AI/AN tribal governments can integrate the employment, training, and related services they provide in order to improve the effectiveness of those services
- ◆ Reduce joblessness in AI/AN communities
- ◆ Foster economic development on AI/AN lands
- ◆ Serve tribally determined goals consistent with the policy of self-determination and self-governance

P.L. 102–477 permits tribal governments to consolidate a number of federal programs, including CCDF, into a single coordinated, comprehensive program. The Department of the Interior serves as the lead federal agency for all P.L. 102–477 plans. Eligible tribal applicants may choose to streamline tribal services by submitting a consolidated plan to the Department of the Interior.³

ACF publishes annual program instructions providing directions for tribes wishing to consolidate CCDF funds under a P.L. 102–477 plan. This program instruction includes information on the 102–477 plan. The Department of the Interior has lead responsibility for administration of P. L. 102–477 programs.⁴

To receive CCDF funding under a consolidated P.L. 102–477 plan, all AI/AN grantees and applicants must meet the following criteria:⁵

- ◆ Be eligible to receive CCDF funding
- ◆ Submit, and receive OCC approval of, an abbreviated CCDF Plan
- ◆ Have no outstanding CCDF program reports (ACF-700) or financial reports (ACF-696T) (applicable only to tribes submitting initial P.L. 102–477 plans)
- ◆ Have received approval from the Department of the Interior for a consolidated P.L. 102–477 plan that includes CCDF

Tribes that have consolidated CCDF with other employment, training, and related programs under P.L. 102–477 are not required to submit separate CCDF Plans, but will be required to submit amendments to their P.L. 102–477 plans, along with associated documentation, to demonstrate compliance with the final rule (AI/AN grantees are expected to be in compliance with the 2016 CCDF final rule by October 1, 2019).

Tribes that have received approval to consolidate CCDF funds under a P.L. 102–477 plan submit a triennial child count to OCC, but are not required to submit the triennial CCDF Plan, the annual ACF-700 program data reporting form, or the annual ACF-696T financial reporting form.

³ Office of Child Care, Administration for Children and Families, U.S. Department of Health and Human Services. (2016). Procedures to consolidate the CCDF program with other employment and training funding sources under a P.L. 102-477 plan (Program instruction: CCDF-ACF-PI-2016-04). Retrieved from https://www.acf.hhs.gov/sites/default/files/occ/ccdf_acf_pi_2016_04.pdf.

⁴ Office of Child Care, Administration for Children and Families, U.S. Department of Health and Human Services. (2016). Procedures to consolidate the CCDF program with other employment and training funding sources under a P.L. 102-477 plan (Program instruction: CCDF-ACF-PI-2016-04). Retrieved from https://www.acf.hhs.gov/sites/default/files/occ/ccdf_acf_pi_2016_04.pdf.

⁵ Office of Child Care, Administration for Children and Families, U.S. Department of Health and Human Services. (2016). Procedures to consolidate the CCDF program with other employment and training funding sources under a P.L. 102-477 plan (Program instruction: CCDF-ACF-PI-2016-04). Retrieved from https://www.acf.hhs.gov/sites/default/files/occ/ccdf_acf_pi_2016_04.pdf.

Grantees operating CCDF under a P.L. 102–477 plan must operate a comprehensive CCDF program in accordance with the provisions of the CCDBG Act of 2014, as amended, and the implementing regulations at 45 C.F.R parts 98 and 99, and must use all CCDF funds for child care purposes as defined by these regulations. They must also conform to all P.L. 102–477 grantee requirements, including the consolidated plan and reporting requirements.

Lead Agency Designation

AI/AN grantees must designate a **Lead Agency**⁶ to apply for funding and be accountable for administering the CCDF program. Within the broad framework of federal regulations governing the CCDF program, each Tribal Lead Agency has considerable flexibility in administering and implementing its child care program, determining the basic use of the funds, and identifying spending priorities based on the specific needs of the children and families in the tribal community.⁷

Key Responsibilities of the Tribal Lead Agency⁸

- ◆ Serve as the single point of contact for administering the CCDF program
- ◆ Create rules and regulations for the local tribal child care program
- ◆ Submit required programmatic and fiscal reports
- ◆ Consult with the tribal council or governing body and others in the community in the development of the CCDF Plan
- ◆ Coordinate CCDF-funded services with other federal, state, local, and tribal child care and early childhood development programs, including relevant state CCDF Lead Agencies
- ◆ Develop the CCDF Plan in accordance with ACF regulations, including holding a public hearing
- ◆ May contract with other agencies to administer the child care program, but must oversee expenditures and maintain control to ensure compliance with CCDF regulations and the Tribal CCDF Plan

Applying for CCDF Funds

OCC issues a program instruction⁹ (PI) to AI/AN CCDF grantees that describes the application procedures for CCDF monies for the upcoming fiscal year. The federal fiscal year starts October 1 and ends September 30. To receive CCDF funding, tribes must submit a CCDF Plan every 3 years and a funding application every year.

In years that CCDF Plans are submitted, Tribal Lead Agencies must also submit a completed and signed Child Count Declaration.¹⁰ The Child Count Declaration certifies the number of AI/AN children (as defined by the tribe) under age 13 who reside on or near the tribe’s reservation or CCDF service area.¹¹ The governing body of the tribe or a person authorized to act for the applicant tribe or organization must sign (self-certify) the Child Count Declaration. The triennial CCDF Plan serves as the application and includes the Child Count Declaration. The Child Count Declaration is used by ACF to calculate the amount of the grant award.

⁶ Child Care and Development Fund, 45 C.F.R. §§ 98.10, 98.83 (2016).

⁷ Office of Child Care, Administration for Children and Families, U.S. Department of Health and Human Services. (2016). FY 2017-2019 tribal plan preprint (Program instruction: CCDF-ACF-PI-2016-03). Retrieved from <https://www.acf.hhs.gov/occ/resource/ccdf-acf-pi-2016-03>.

⁸ Child Care and Development Fund, 45 C.F.R. § 98.10 (2016).

⁹ Office of Child Care, Administration for Children and Families, U.S. Department of Health and Human Services. (2016). FY 2017-2019 tribal plan preprint (Program instruction: CCDF-ACF-PI-2016-03). Retrieved from <https://www.acf.hhs.gov/occ/resource/ccdf-acf-pi-2016-03>.

¹⁰ Office of Child Care, Administration for Children and Families, U.S. Department of Health and Human Services. (2016). FY 2017-2019 tribal plan preprint (Program instruction: CCDF-ACF-PI-2016-03). Retrieved from <https://www.acf.hhs.gov/occ/resource/ccdf-acf-pi-2016-03>.

¹¹ The Tribal Lead Agency defines “Indian children” and “service area” in Section 2.1 of its CCDF Plan. Tribes may not count any children who are included in the child count of another CCDF Tribal Lead Agency. To ensure unduplicated counts, a Tribal Lead Agency is required to confer with all other Tribal CCDF Lead Agencies with overlapping or neighboring service areas.

Developing a Triennial Tribal CCDF Plan

The Tribal CCDF Plan serves as the application for CCDF funds by providing a description of, and assurance about, the Tribal Lead Agency's child care program and all services available to eligible families.

The Tribal CCDF Plan Preprint for FY 2017-2019 (the preprint for current plans) is not the same as previous versions. It was completed before the 2016 final rule was issued and is based on a reasonable interpretation of the CCDBG Act of 2014. Current plans are approved until review of the FY 2020–2022 plans, due July 1, 2019. At that point, AI/AN grantees will demonstrate full implementation of all new requirements of the CCDBG Act of 2014. In the meantime, OCC is partnering with tribes to support and monitor the successful and timely implementation of all provisions of the CCDBG Act of 2014. Beginning in FY 2020, all Tribal CCDF Plans must comply with the following updates under the final rule, which was released September 30, 2016.

The CCDF Plan provides details on the unique aspects of CCDF as applied to AI/AN grantees, contains specific assurances and certifications required by CCDBG statute, and provides detailed information about the overall management of CCDF services, including information regarding the following:

- ◆ Income eligibility guidelines
- ◆ Provider payment rates
- ◆ Service priorities
- ◆ Parental rights and responsibilities
- ◆ Program integrity and accountability
- ◆ Quality improvement activities

Finally, the CCDF Plan provides an opportunity for Tribal Lead Agencies to demonstrate the many activities and services they are providing to meet the needs of low-income children and families.

Effective FY 2017, the following changes have been implemented for Tribal CCDF Plans:

- ◆ Plans now cover a 3-year period rather than a 2-year period
- ◆ Plans must be submitted to the Regional Program Manager with a cover letter
- ◆ Applicants are required to hold a public hearing to provide the public with an opportunity to comment on the provision of child care services (notice of the hearing must be issued 20 calendar days in advance)

Tribes applying for small-allocation CCDF grants (less than \$250,000) are permitted to submit abbreviated plans.

Phased-In Implementation of the Final Rule¹²

ACF will determine compliance with provisions in the final rule through review and approval of the FY 2020–2022 CCDF Plans that become effective October 1, 2019.¹³

The Tribal CCDF Plan for FY 2017–2019 is a transitional plan for the period leading to full implementation of the new regulations based on reauthorization. This plan is based on the old regulations from 1998, but it also includes some questions from the CCDBG Act of 2014. AI/AN grantees were not expected to be in compliance with the Act at the time they submitted the current plan, and the plan is not reflective of the entire Act. In addition, the current plan includes an option for an abbreviated plan (section 8) that AI/AN grantees who receive less than \$250,000 could choose to complete.

AI/AN grantees will be expected to be in compliance with the 2016 CCDF final rule by October 1, 2019. This approach gives AI/AN grantees approximately 3 years (close to 36 months) to implement the new provisions in the final rule.

Programs should begin implementation of the final rule as soon as they can, and use the current plan cycle to work toward compliance. Guidance on the next CCDF Plan Preprint is issued annually by OCC via its regional offices.

Tiered Requirements

The CCDF requirements AI/AN grantees are subject to are based on the size of their CCDF allocations—not to be confused with the size of the tribe or of the tribe's CCDF program. AI/AN CCDF allocations range from approximately \$25,000 to over \$14 million. Thus, the final rule outlines three categories for AI/AN CCDF grants: large allocations, medium allocations, and small allocations.¹⁴ These categories are paired with different levels of CCDF requirements, with grantees receiving the largest allocations subject to the majority of CCDF requirements. AI/AN grantees receiving smaller allocations are exempt from specific provisions in order to account for the size of the grant awards.

Small-Allocation AI/AN Grantees (under \$250,000)

Small-allocation AI/AN grantees are exempt from the majority of CCDF requirements, including the exemptions for medium- and large-allocation grantees. All AI/AN grantees must spend their funds in alignment with CCDF goals and purposes.

These AI/AN grantees are subject to only the following requirements:

- ◆ Health and safety requirements
- ◆ Monitoring requirements (with flexibility to propose an alternate approach)
- ◆ Background check requirements (with flexibility to propose an alternate approach)
- ◆ Quality spending requirements (except the infant/toddler quality requirements)
- ◆ Eligibility definitions of Indian child and Indian reservation or tribal service area
- ◆ The 15 percent administrative spending cap

¹² Office of Child Care, Administration for Children and Families, U.S. Department of Health and Human Services. (2016). CCDF final rule tribal fact sheet. Retrieved from <https://www.acf.hhs.gov/occ/resource/ccdf-final-rule-tribal-fact-sheet>.

¹³ Child Care and Development Fund (CCDF) Program, 81 Fed. Reg. 67,438 (Sept. 30, 2016) (codified at 45 C.F.R. pt. 98).

¹⁴ Child Care and Development Fund, 45 C.F.R. § 98.80 (2016).

- ◆ Fiscal, audit, and reporting requirements
- ◆ Any other requirement defined by the Secretary of Health and Human Services

In addition, section 8 of the Tribal CCDF Plan for FY 2017–2019 provides an optional abbreviated plan for AI/AN grantees and tribal consortia receiving annual CCDF allocations of less than \$250,000.

- ◆ AI/AN grantees that select this option are not required to complete Sections 1–7 of the plan.
- ◆ However, AI/AN grantees with allocations of less than \$250,000 can choose to complete Sections 1–7. If they choose to do so, they must complete all sections unless specifically exempted as noted in the instructions.

Medium-Allocation (\$250,000 to \$1 million) and Large-Allocation (over \$1 million) AI/AN Grantees

These AI/AN grantees are subject to the majority of CCDF requirements, including the following:

- ◆ Health and safety requirements
- ◆ Monitoring requirements (with flexibility to propose an alternate approach)
- ◆ Background check requirements (with flexibility to propose an alternate approach)
- ◆ Quality spending requirements, including infant/toddler quality requirements
- ◆ Eligibility definitions (exempt from the requirement to provide a definition of very low income)
- ◆ The 15 percent administrative spending cap
- ◆ Fiscal, audit, and reporting requirements
- ◆ Requirements for helping parents make informed consumer choices and access information to support child development
- ◆ Requirements to provide equal access to stable, high-quality child care for children from low-income families
- ◆ **Large-allocation grantees only:** The requirement to operate a certificate program

Medium-allocation and large-allocation AI/AN CCDF grantees are exempt from the following requirements:

- ◆ Consumer education website
- ◆ Market rate survey or alternative methodology
- ◆ Increased access to high-quality care in concentrations of poverty
- ◆ Early learning and developmental guidelines
- ◆ Licensing requirements applicable to child care services
- ◆ Matching funds requirements
- ◆ Identification of public or private entities designated to receive private funds
- ◆ The 5 percent administrative cap
- ◆ A definition of very low income
- ◆ A description of how the Lead Agency will meet the needs of certain families

- ◆ Training and professional development framework
- ◆ Quality progress report
- ◆ Certification to develop the CCDF Plan in consultation with the state advisory council

In addition to these exemptions, **medium-allocation grantees** are also exempt from the requirement to operate a certificate program (but if a tribe decides to operate a certificate program, it has to meet the same requirements as large-allocation tribes).

Fiscal Aspects of AI/AN CCDF Administration

Tribal CCDF grants are composed of federal discretionary funds (CFDA 93.575¹⁵) and mandatory funds (CFDA 93.596¹⁶). No tribal match is required to receive and use these funds.

- ◆ The discretionary funds include a **base amount** (\$30,000 for tribes with at least 50 AI/AN children under 13; base amounts for tribal consortia will vary) plus a per-child amount. The base amount is an important source of funds that can be used for any costs that are consistent with CCDF program parameters. The base amount can provide an opportunity to develop a tribe's infrastructure and capacity to operate a child care program and can be used for administrative costs, direct child care services to children, nondirect services, or quality and availability activities.
- ◆ The amount of mandatory funds received is calculated solely on a per-child basis. The mandatory and discretionary per-child amounts are based on the information reported in the triennial Child Count Declaration.

Periods of Availability of Federal Funds

CCDF funds are available to Tribal Lead Agencies each year soon after October 1—the beginning of the federal fiscal year. AI/AN grantees have 2 years to obligate (formally commit, such as through a contract or other legally binding agreement) the funds, and an additional year to liquidate (pay out) the funds. By April 1 of each year, AI/AN grantees are required to send a letter to ACF projecting any amounts they will not be able to obligate by the end of the second year. If certain conditions are met, unobligated discretionary funds may be reallocated to other tribes. Any funds not obligated and liquidated in the required timeframes go back to the federal government.¹⁷

The CCDF financial report is known as the ACF-696T. Tribes (except those receiving CCDF funds through a P.L. 102–477 consolidation plan) are required to use the ACF-696T to report expenditures for mandatory, discretionary, and construction or renovation funds issued under the CCDF. Reports are required to be submitted annually on or before December 29th, which allows 90 days after the close of the fiscal year for completion.¹⁸

CCDF funds are available for use in more than one fiscal year, allowing for short- and long-term planning. Since grantees must report on their unobligated balance and unliquidated obligations for each fiscal year, they may need to submit more than one ACF-696T financial report in a calendar year.

Financial Reporting (ACF-696T)

The ACF-696T report tracks CCDF expenditures in the following categories:

¹⁵ Catalog of Federal Domestic Assistance, CFDA 93.575, <https://www.cfda.gov/programs/93.575>.

¹⁶ Catalog of Federal Domestic Assistance, CFDA 93.596, <https://www.cfda.gov/programs/93.575>.

¹⁷ Child Care and Development Fund, 45 C.F.R. § 98.64 (2016).

¹⁸ Office of Child Care, Administration for Children and Families, U.S. Department of Health and Human Services. (2017). Form ACF-696T—a financial reporting form for Child Care and Development Fund (CCDF) tribal lead agencies (Program instruction: CCDF-ACF-PI-2017-02). Retrieved from https://www.acf.hhs.gov/sites/default/files/occ/ccdf_acf_pi_2017_02.pdf.

- ◆ Child care services (direct services to children)
- ◆ Child care administration
- ◆ Nondirect services
- ◆ Quality activities
- ◆ Construction and renovation expenditures

Tribal Lead Agencies have the option of submitting the ACF-696T manually, by mailing hard copies, or online using the Online Data Collection (OLDC) system. ACF encourages grantees to use the OLDC system since it reduces paperwork, allows for quicker processing, automatically completes required calculations, and checks for potential errors. Access to OLDC is password protected; Lead Agencies can request access to the system using the Request for OLDC Access form, which is available online (along with OLDC help sheets, user guides, and interactive tutorials) at <https://extranet.acf.hhs.gov/oldccdocs/materials.html>.

Restrictions on the Use of Funds

For students enrolled in grades 1 through 12, CCDF funds may not be used for school tuition, any service provided during the regular school day, any service resulting in academic credit toward graduation, or instructional service that supplants or duplicates the academic program of any public or private school.

Funds given to providers through grants or contracts may not be used for any faith-based purposes. However, child care certificates or vouchers given to parents may be used for faith-based purposes when provided as part of child care services. For example, a parent can use a CCDF certificate or voucher to pay for child care services provided in a church facility, even when part of the child care program includes worship or religious instruction. The reason for this distinction is that use of a certificate or voucher is an agreement between the parent and the provider, whereas a contract or grant is an agreement between the CCDF program and the provider (and use of CCDF funds in the form of contracts and grants in this manner is restricted by law).

CCDF funds may not be used as part of the nonfederal share or match for any other federal grant programs. CCDF funds also cannot be used to purchase land or an existing building or facility, although Tribal Lead Agencies may request to use CCDF funds for the cost of constructing or renovating a modular unit, including the costs of buying and installing the unit.¹⁹

Construction and Renovation of Child Care Facilities

The CCDBG Act of 2014 reaffirms that Tribal Lead Agencies can use CCDF funds for construction or renovation of child care facilities. The Act continues to disallow the use of CCDF funds for construction or renovation if such use will result in a decrease in the level of child care services. However, the Act now allows for a waiver for this clause if the decrease in the level of child care services is temporary. Additional information is provided in [Tribal CCDF Guide to Financial Management, Grants Administration, and Program Accountability](#).

Administrative Costs

CCDF, like many other federal grant programs, limits the amount of administrative costs that can be charged.²⁰ Administrative costs include the organization-wide management functions of accounting, budgeting, coordination,

¹⁹ Office of Child Care, Administration for Children and Families, U.S. Department of Health and Human Services. (2016). Procedures for requests from tribal lead agencies to use Child Care and Development Fund (CCDF) funds for construction or major renovation of child care facilities (Program instruction: CCDF-ACF-PI-2016-05). Retrieved from https://www.acf.hhs.gov/sites/default/files/occ/ccdf_acf_pi_2016_05.pdf.

²⁰ Child Care and Development Fund, 45 C.F.R. § 98.83(i) (2016).

direction, and planning, as well as the management of payroll, personnel, property, and purchasing. Such costs can be for either personnel or nonpersonnel functions. Of the total expenditures of CCDF mandatory and discretionary funds, no more than 15 percent can be used for administrative costs. The 15 percent cap applies to cumulative expenditures over the 3-year grant liquidation period. The base amount of the grant is not subject to the administrative cap and is excluded from the calculation.

Use of Funds to Improve Quality of Child Care

The CCDF regulations require small-, medium-, and large-allocation AI/AN grantees to spend no less than 4 percent of their CCDF funding on quality activities in fiscal year 2017, 7 percent in fiscal years 2018 and 2019, 8 percent in fiscal years 2020 and 2021, and 9 percent in fiscal year 2022.²¹ Quality activities include activities designed to provide comprehensive consumer education, increase parental choice, and improve the quality and availability of child care services. Like administrative costs, the quality expenditures are cumulative over the 3-year grant liquidation period, and the minimum percentages apply to total funds expended, rather than to funds that are available but not used.

CCDF quality expenditures can be used to support an AI/AN grantee's vision for growing and nurturing children and supporting their families through the delivery of comprehensive child care services. When quality funds are used to provide training and professional development for child care providers to enhance their knowledge and skills, or to assist providers in meeting health and safety standards, the result is improved care for children. Similarly, using quality funds to improve provider compensation helps build a reliable and stable workforce, which in turn helps improve program quality.

AI/AN CCDF programs use quality funds to support cultural heritage, tribal traditions, and native-language acquisition within a variety of early childhood settings, including in-home care, family child care, and center-based care. CCDF quality funds also may be used in ways that support establishing meaningful ongoing opportunities to involve families in policy decisions and program activities. Quality activities should occur within the context of AI/AN CCDF programs and should be planned to ensure that they meet the program's goals.²² More information regarding implementation of quality improvement activities is provided in the [continuous quality improvement](#) section of this guide.

Direct and Nondirect Services

Tribal Lead Agencies with medium and large allocations are required to spend a substantial percentage of their discretionary funds on direct child care services. After taking into account funds reserved for quality activities and administrative costs, Tribal Lead Agencies with medium and large allocations must use no less than 70 percent of the remaining discretionary funds to fund direct services provided by the Lead Agency²³.

Tribal Lead Agencies may use a portion of their funds on nondirect services. The nondirect service category is generally defined as the costs that do not fit into the administrative, construction, quality, or direct services cost categories.²⁴ Expenditures that qualify as nondirect services do not count against the 15 percent administrative cap limitation. The following activities, which include many components of establishing and operating a certificate or voucher program, may be considered nondirect costs:

- ◆ Eligibility determination and redetermination
- ◆ Establishment and maintenance of computerized child care information systems
- ◆ Preparation for, and participation in, judicial hearings

²¹ Child Care and Development Fund, 45 C.F.R. § 98.83(g)(1) (2016).

²² A list of sample quality activities is provided in appendix C.

²³ Child Care and Development Fund, 45 C.F.R. § 98.50 (f) (2016).

²⁴ Child Care and Development Fund, 45 C.F.R. § 98.65(h)(4)(i-iii) (2016).

- ◆ Child care placement
- ◆ Recruitment, licensing, inspection, reviews, and supervision of child care placements
- ◆ Rate setting
- ◆ Resource and referral services (may also be a quality activity)
- ◆ Training of child care staff (providers of direct services)

Program Data Reporting

On an annual basis, Tribal Lead Agencies (except those funded through P.L. 102–477) are required to submit information on the child care services that were provided during the fiscal year.²⁵ The tribal CCDF annual report consists of two parts:

- ◆ Administrative data: The ACF-700 form collects data on all children and families receiving direct CCDF-funded child care services, and on the services provided.
- ◆ Tribal narrative: The supplemental narrative report to the ACF-700 form requests descriptions of the results of specific quality CCDF-funded activities available on the Tribal Lead Agency's reservation or CCDF service area. This narrative report provides the Lead Agency with an opportunity to tell the story of how, alone or in collaboration with others, it is working to improve the quality and availability of child care services in the communities it serves.

The tribal annual report is submitted once a year, but it relies on program information that must be captured and coded on a monthly basis throughout the year.

While Tribal Lead Agencies have the option of submitting their annual reports by mail, OCC encourages electronic submission of both the ACF-700 and Supplemental Narrative to streamline processing and improve data quality. ACF-700 reports can be submitted through a password-protected form on the ACF-700 Data Submission Center website (<https://extranet.acf.hhs.gov/acf700/login/login700.jsp>). Lead Agencies may contact the National Center on Child Care Data and Reporting for technical assistance or more information on the annual report (contact information is available in appendix B).

²⁵ Office of Child Care, Administration for Children and Families, U.S. Department of Health and Human Services. (2016). Child Care and Development Fund (CCDF) tribal annual report form ACF-700 for tribal lead agencies (Program instruction: CCDF-ACF-PI-2016-06). Retrieved from https://www.acf.hhs.gov/sites/default/files/occ/ccdf_acf_pi_2016_06.pdf.

Program Implementation

In order to best meet the needs of families as they pursue financial self-sufficiency and school success for their children, CCDF regulations allow AI/AN grantees a great deal of flexibility and broad discretion in designing high-quality child care services that are developmentally and culturally appropriate.

The flexibility of the CCDF program gives Tribal Lead Agencies the opportunity and responsibility to design child care assistance systems that support the long-term success of children and families. Many program options exist for developing and implementing responsive child care services; however, there are also a number of CCDF requirements that must be met, including requirements on the eligibility of participating families and child care providers.

The remainder of this guide will discuss the following topics as they apply to AI/AN CCDF grantees, including requirements defined in the final rule.

- ◆ Leadership and coordination with relevant systems
- ◆ Providing stable child care financial assistance for families
- ◆ Equal access to high-quality child care for children from low-income families
- ◆ Family engagement through outreach and consumer education
- ◆ Health and safety of children in child care settings
- ◆ Continuous quality improvement

Leadership and Coordination with Relevant Systems

Coordination has taken on new significance under reauthorization. AI/AN applicants must describe how they will **coordinate** with state CCDF programs and with other federal, state, and local programs serving children to the extent practicable.²⁶ Applicants are also required to **consult** with a number of local and state entities when developing their CCDF Plans.

Coordination entails working together to share resources and information in order to ensure that children and families served have access to additional resources and services for which they might qualify.

Consultation entails information sharing and information gathering regarding plan development, implementation of program services, and availability of resources for children and families served.

In addition, Tribal Lead Agencies are required to demonstrate how they are coordinating, to the extent practicable, the provision of CCDF-funded child care services with other federal, state, and local child care and early childhood development programs (including programs for the benefit of AI/AN children, infants and toddlers, children with disabilities, children experiencing homelessness, and children in foster care) to expand accessibility and continuity of care as well as full-day services.²⁷

All AI/AN grantees have the flexibility to participate in coordination activities with the entities that are most relevant to their community's specific needs, especially when it comes to providing culturally relevant services.

Coordination can help grantees reach goals related to expanding accessibility and continuity of care, such as the following:

²⁶ Child Care and Development Fund, 45 C.F.R. § 98.82 (2016).

²⁷ Child Care and Development Fund, 45 C.F.R. §§ 98.12, 98.14, 98.82 (2016).

- ◆ Helping children receive full-day services
- ◆ Extending the hours or calendar year of services
- ◆ Enhancing and aligning the quality of services
- ◆ Smoothing transitions for children
- ◆ Linking comprehensive service to children in child care settings
- ◆ Increasing the supply of quality care for vulnerable populations

Tribal Lead Agencies are also required to coordinate provision of services with state and, if applicable, tribal agencies responsible for the following:

- ◆ Public education (including agencies responsible for prekindergarten services, if applicable, and early intervention and preschool services provided under Parts B and C of the Individuals with Disabilities Education Act)
- ◆ Providing Temporary Assistance for Needy Families (TANF)
- ◆ Child care licensing
- ◆ Head Start collaboration
- ◆ State advisory council on early childhood education and care or similar coordinating body
- ◆ Statewide afterschool network or other coordinating entity for out-of-school-time care (if applicable)
- ◆ Emergency management and response
- ◆ Child and Adult Care Food Program and other relevant nutrition programs
- ◆ Services for children experiencing homelessness, and, to the extent practicable, local liaisons designated by local educational agencies in the state as required by the McKinney-Vento Act, and Continuum of Care²⁸ grantees
- ◆ Medicaid and the State Children's Health Insurance Program
- ◆ Mental health services
- ◆ Child care resources and referral agencies, child care consumer education organizations, and providers of early childhood education training and professional development

Tribal-State Collaborations

AI/AN children are dually eligible to receive services from tribal and state CCDF programs. This means that, for child care services funded by CCDF, the eligibility of AI/AN children for a tribal program does not affect their eligibility for a state program. To receive services under a program, the child must still meet the eligibility criteria of that program, but states cannot have a blanket policy of refusing to provide child care services to AI/AN children. Dual eligibility provides tribes and states a unique opportunity to coordinate services to ensure that high-quality child care is available to and affordable for eligible AI/AN children.²⁹

²⁸ U.S. Department of Housing and Urban Development (n.d.) Continuum of Care (CoC) program. Retrieved from <https://www.hudexchange.info/programs/coc/>.

²⁹ Office of Child Care, Administration on Children, Youth, and Families, U.S. Department of Health and Human Services. (1997). Dual eligibility for Indian children. Policy interpretation question ACYF-PIQ-CC-97-01. Retrieved from <http://www.acf.hhs.gov/programs/occ/resource/piq-acyf-piq-cc-97-01>.

The CCDBG Act of 2014 includes several provisions that increase the need for close coordination between states and tribes in implementing their CCDF-funded child care services. Under the new law, states must do the following:

- ◆ At the option of the tribes, collaborate and coordinate with tribes in a timely manner in the development of the CCDF Plan³⁰
- ◆ Ensure that required training and professional development are accessible to CCDF child care providers supported through tribes or tribal organizations and, to the extent practicable, appropriate for Native American children³¹
- ◆ Describe in their CCDF Plans how they coordinate services with a number of different groups, including tribal early childhood programs, to expand accessibility and continuity of care and help children receive full-day services³²
- ◆ Demonstrate how they are encouraging partnerships among other entities, including tribes and tribal organizations, to leverage existing service delivery systems for child care and development services and to increase the supply and quality of child care services³³

In addition to the required areas of coordination, states are encouraged to engage in government-to-government dialogue and collaboration with tribes as key stakeholders in all aspects of their CCDF program development and implementation, including market rate data collection and dissemination. For more information on tribal-state collaboration, see [Tribes and States Working Together: A Guide to Tribal-State Child Care Coordination](#).

Partnerships

Partnerships are important to the success of AI/AN child care programs and can be key to meeting program goals for children and families. Key program partners for AI/AN CCDF programs include Head Start, TANF, employment services, child welfare, public health, and other tribal and community educational programs.³⁴ Successful partnerships often display the following partnership principles:³⁵

- ◆ Have clearly defined goals at the outset to ensure understanding among partners that will help guide the partnership through obstacles and challenges
- ◆ Involve families and account for their needs and preferences when developing programs and services
- ◆ Include all stakeholders from the beginning and draw from a broad range of perspectives, resources, and expertise
- ◆ Involve powerful champions that make their initiatives visible to the public
- ◆ Aim to achieve positive results and regularly measure their progress
- ◆ Establish clear governance structures that define partner roles and responsibilities
- ◆ Set and adhere to ground rules that guide the partnership in its work
- ◆ Are flexible and adapt to changing conditions and resources
- ◆ Draw on the strengths of all partners and enable all partners to benefit

³⁰ Child Care and Development Fund, 45 C.F.R. § 98.10(f) (2016).

³¹ Child Care and Development Fund, 45 C.F.R. § 98.44(b)(2)(iv)(vi) (2016).

³² Child Care and Development Fund, 45 C.F.R. § 98.14(a)(1) (2016).

³³ Child Care and Development Fund, 45 C.F.R. § 98.14(a)(4) (2016).

³⁴ A list of potential collaborative partners can be found in appendix D

³⁵ Adapted from *Principles for Successful Public-Private Partnerships* (2014), created by the Child Care Partnership Project and available online at https://childcareta.acf.hhs.gov/sites/default/files/public/sss_n_principlessuccessfulpartnerships_0.pdf.

- ◆ Work to maintain momentum and sustain their work over time

Providing Stable Child Care Financial Assistance for Families

The majority of requirements specific to stable financial assistance apply only to medium- and large-allocation grantees. However, a few requirements also apply to small-allocation grantees; these are described below.

Requirements for All Grantees

Defining Indian Child

For the purposes of determining eligibility, all AI/AN CCDF grantees are required to define “Indian child.” Small-, medium-, and large-allocation grantees have flexibility in defining “Indian child,” and may include children from other tribes if such tribes are federally recognized, consistent with the CCDBG Act’s definition of Indian tribe.

Service Area

For the purposes of determining eligibility, all AI/AN CCDF grantees are required to define “Indian reservation” or “tribal service area.” The service area must be “on or near the reservation,” and therefore must be within a reasonably close geographic proximity to the delineated borders of a tribe’s reservation (with the exception of tribes in Alaska, California, and Oklahoma). Tribes that do not have reservations must establish service areas within reasonably close geographic proximity to the area where the tribe’s population resides. ACF will not approve an entire state as a tribe’s service area.

Dual Eligibility

AI/AN children are dually eligible to receive services from tribal and state CCDF programs.³⁶ This means that the eligibility of AI/AN children for an AI/AN CCDF program does not affect their eligibility for a state CCDF program. To receive services under a program, the child must still meet the other eligibility criteria of that program, but states cannot have a blanket policy of refusing to provide child care services to AI/AN children. It is important to note that although AI/AN children are dually eligible, AI/AN children cannot receive CCDF assistance through both state and AI/AN CCDF funds at the same time. However, tribes can coordinate with their respective state CCDF agencies to ensure that AI/AN children and families have access to state CCDF assistance if necessary.

Requirements for Medium- and Large-Allocation Grantees

The final rule added **requirements for medium- and large-allocation CCDF grantees** that will provide more stable child care financial assistance to families on their path to financial stability, including extending children’s eligibility for child care regardless of temporary changes in parents’ earnings and work, training, or school schedules. This will make it easier for parents to maintain employment or finish education programs.

³⁶ Office of Child Care, Administration on Children, Youth, and Families, U.S. Department of Health and Human Services. (1997). Dual eligibility for Indian children. Policy interpretation question ACYF-PIQ-CC-97-01. Retrieved from <http://www.acf.hhs.gov/programs/occ/resource/piq-acyf-piq-cc-97-01>.

Child Age, Citizenship, and Residence

AI/AN CCDF programs can serve families with children under age 13 (or, for children who are mentally or physically incapable of self-care or are under court supervision, the Tribal Lead Agency has the option of serving up to, but not including, age 19) who meet the following eligibility criteria:

- ◆ Children must reside with parents, or individuals acting in loco parentis (in the place of a parent), who are working or participating in education or training activities.
- ◆ Family income must be at or below 85 percent of state or tribal median income; however, tribes have the option to set a lower income threshold in order to target services to certain priority families and children.
- ◆ Children receiving or in need of protective services may be eligible for child care services. Tribes may also choose to provide respite care for children receiving protective services.^{37, 38}

Lead Agencies are responsible for ensuring that all children served are eligible for the program; therefore, grantees should have procedures in place to document and verify child and family eligibility. At a minimum, Lead Agencies should verify and maintain proof of the child's age, the family's income, and the parent or parents' participation in eligible work, education, or training activities, and eligibility should be redetermined at regular intervals.

Parental Activities and Reason for Care

Parents must be working or participating in education or training activities, except for temporary interruptions. Children receiving or in need of protective services may be eligible even if their parents do not otherwise meet work or activity requirements.

Lead Agencies provide definitions of "working," "attending job training or educational program," and "protective services" in their CCDF Plans.

- ◆ Any work-related activities may be included in the definition of working, including periods of job search, travel time to and from work, self-employment, and temporary interruptions.
- ◆ Any training- or education-related activities may be included in the definition of this criterion, including study time, travel time to and from education or training, and attendance of online courses in the home.
- ◆ The definition of protective services may extend beyond formal child welfare, foster care, or subsidized guardianship cases.
- ◆ Lead Agencies may elect to include other vulnerable populations, such as homeless children, children of teen parents, and children at risk of needing protective services in their definitions.³⁹

Lead Agencies are not required to determine the need for care based solely on the actual hours parents attend work, education, and training activities. Lead Agencies have flexibility to consider the developmental needs of the child and specific family circumstances, such as jobs requiring split work schedules, breaks between education courses, and sleep time for parents who work multiple jobs or have nontraditional work hours.

³⁷ AI/AN CCDF grantees can, at their discretion, allow children in foster care to be included under the CCDF program's definition of "protective services." Tribes considering this option should carefully coordinate their efforts with the appropriate foster care agencies. See Child Care and Development Fund, 45 C.F.R. § 98.20 (both the preamble and the amended regulations) and § 98.16(f)(7), as well as CCDF Plan Preprint section 3.4.4. Foster children may also be eligible for the CCDF program as a "family of one" or through the work, education, or training activities and income levels of the foster parents.

³⁸ Respite care in excess of 24 hours can be provided for brief, occasional periods for children in protective services. Respite care must be defined under "protective services" in the CCDF Plan. See Child Care and Development Fund, 45 C.F.R. § 98.16(f)(7) (2016).

³⁹ Child Care and Development Fund, 45 C.F.R. § 98.16(g) (2016).

AI/AN CCDF programs also have the flexibility to set additional eligibility requirements and to establish additional priority categories. This flexibility allows programs to target services to children and families with the greatest needs, such as families headed by teen parents or working families with incomes below the poverty level.

Categorical Eligibility

Tribal Lead Agencies that receive large or medium allocations have the flexibility to consider any AI/AN child in their service area to be eligible to receive CCDF funds, regardless of the family's income, work, or training status, as long as the tribal median income is below 85 percent of state median income in the state in which the tribe is located.

The final rule requires AI/AN grantees that take this option (called categorical eligibility) to ensure that provision of services still goes to those with the highest need. Tribal Lead Agencies will describe in their CCDF Plans how they are ensuring that families with the greatest need are receiving CCDF services. This flexibility allows tribes to create opportunities to align CCDF programs with other tribal early childhood programs, including tribal home visiting, Early Head Start, and Head Start.

Family Contribution

Families are required to make a contribution to the cost of care through a copayment. Lead Agencies must establish, and periodically revise, a sliding fee scale for copayments based on family size and income. Sliding fee scales can also vary on additional factors, such as the number of children in care and whether the care is full- or part-time; however, Lead Agencies may not use the cost of care when determining copayments. Lead Agencies should ensure that family copayments are not a barrier to families receiving assistance. Copayments that are no more than 7 percent of family income are generally considered affordable for families.⁴⁰

Improving Access for Vulnerable Children and Families

Priority for CCDF services must be given to children with special needs, as defined in the tribe's CCDF Plan. Tribal Lead Agencies have flexibility in how they define "children with special needs." Tribal Lead Agencies are not limited to only including children with physical or mental disabilities in this category. For example, Lead Agencies could consider children in the child welfare system, children of teen parents, or homeless children in their definition of children with special needs.

Tribal Lead Agencies also have the flexibility to establish procedures to improve child care access for homeless children, including procedures allowing a grace period during which homeless children can receive CCDF assistance while their families are, for example, gathering required documentation or taking action to comply with immunization and other health and safety requirements.

Promoting Continuity of Care

Tribes receiving large and medium allocations are also required to meet the following requirements in the final rule:

- ◆ The final rule clarifies that minimum 12-month eligibility applies to initial and subsequent eligibility periods
- ◆ It defines "temporary" to include, at a minimum, specific time-limited absences from work or school (such as seasonal work or a school break); any reduction in work, training, or education hours; and other changes to work, education, or job training status that do not exceed 3 months
- ◆ It prohibits shorter authorization periods within the minimum 12-month eligibility period

⁴⁰ Child Care and Development Fund, 45 C.F.R. § 98.16(k) (2016).

- ◆ It clarifies that any additional Lead Agency eligibility criteria apply only at the time of initial determination or redetermination

Tribal Lead Agencies are required to take into account irregular fluctuations in income when determining and redetermining eligibility. This is particularly important for families who rely on work that is unpredictable or seasonal in nature, such as agriculture, construction work, or subsistence activities such as hunting and fishing. These families may experience a temporary spike in income due to working increased hours over a short period, yet those earnings are not representative of the family's income over the course of a year.

Continuity and Reporting Requirements for Families during Eligibility Periods

- ◆ The final rule requires families to notify the Tribal Lead Agency if their income exceeds the federal threshold of 85 percent of state median income or 85 percent of the median income for a family of the same size residing in the area served by the Tribal Lead Agency.⁴¹
- ◆ Lead Agencies have the option of requiring families to notify the Lead Agency when they experience a nontemporary change in work, job training, or education status.
- ◆ The final rule also requires Lead Agencies to allow families the option of reporting changes at any time (families may wish to do this if the changes would be beneficial to their amount of child care assistance or copayment level).

Providing a Graduated Phase-Out

- ◆ The CCDBG Act of 2014 establishes graduated phase-out for families who, at redetermination, exceed the Lead Agency income threshold.
- ◆ Lead Agencies that establish income eligibility below 85 percent of state or tribal median income must establish two-tiered eligibility and set their second tier at 85 percent of state or tribal median income, and Lead Agencies have the option of allowing a child to retain eligibility until the family exceeds 85 percent of state or tribal median income.

Equal Access to High-Quality Child Care for Children from Low-Income Families

AI/AN CCDF Child Care Providers

AI/AN child care providers who wish to serve families participating in the CCDF program must be operating legally within the jurisdiction in which they operate. This means that providers must be licensed or regulated in their jurisdiction under state or tribal law, or must be legally exempt from regulation. For program data reporting purposes, all providers are designated as “licensed/regulated” or “CCDF provider, no license category available.”

CCDF regulations define three categories of care based on the setting in which the child care takes place:

- ◆ **In-home child care:** Care provided in the child's home
- ◆ **Family child care:** Care provided by one caregiver (family child care provider) in a private residence other than the child's residence
- ◆ **Center-based child care:** Group care provided in a facility outside the child's or provider's home

⁴¹ Child Care and Development Fund, 45 C.F.R. § 98.81(A)(B) (2016).

In each category of care, child care services are provided for fewer than 24 hours per day per child unless care in excess of 24 hours is required because of the nature of the parent or parents' work (for example, when care is provided for the child of a single-parent firefighter who works 24-hour shifts, or for the child of a married couple whose work activity is multiday subsistence hunting trips). The reference to "fewer than 24 hours" helps distinguish CCDF-eligible child care services from other kinds of care that may be provided to children, such as foster care or residential treatment. Eligible family members, or relative caregivers, can provide care through the CCDF program in any of the categories of care.

How Are Child Care Services Provided?

The majority of CCDF funding is spent on child care services provided directly to eligible children. There are three approaches for families to receive child care assistance through the subsidy system—certificates or vouchers, contracts and grants, and tribally operated child care centers. AI/AN CCDF grantees are responsible for ensuring that all providers of direct services (even tribally operated child care centers) meet the provider eligibility requirements, follow applicable health and safety standards, and adhere to the grantee's policies and procedures.

- ◆ **Certificate program:** Families may obtain a certificate that they can use to purchase the child care of their choice from the full range of available providers that meet the eligibility requirements described above. **AI/AN grantees with small and medium allocations (\$1 million or less) are not required to operate a certificate program.**
- ◆ **Contracts and grants:** AI/AN grantees can choose to contract with, or provide grants to, eligible providers to make child care slots available to families who participate in the child care assistance program. Parents then have the option of using a contracted provider or a tribally operated child care center instead of receiving a certificate.
- ◆ **Tribe-operated child care center:** AI/AN grantees can choose to operate their own child care facilities. The benefits of providing child care services through a tribally operated child care center include having an early learning facility on or near tribal land and the ability to incorporate the tribe's language and culture into the children's curriculum. Tribal Lead Agencies choosing to run their own child care centers must also manage the day-to-day operations of the center, including staffing, staff supervision, and professional development; family enrollment and payment processes; curriculum development; food service management; program administration, including fiscal management; facilities management; and organizing and equipping indoor and outdoor classroom space.

Enhancing Provider Payment Rates (requirements for medium- and large-allocation grantees)⁴²

- ◆ The final rule requires AI/AN grantees to establish base payment rates that support CCDF health, safety, and quality standards.
- ◆ The final rule requires AI/AN grantees to set rates that provide parental choice so that CCDF families can access care of quality comparable to that available to families with incomes above 85 percent of state or tribal median income.
- ◆ The final rule prohibits charging parents fees above the family copayment and sets a new benchmark of 7 percent of a family's income for copayments.
- ◆ The final rule sets limits on when copayments can be adjusted.

⁴² Child Care and Development Fund, 45 C.F.R. § 98.45 (2016).

Improving Payment Practices and Provider Stability (requirements for medium- and large-allocation grantees)

- ◆ The final rule requires that payment practices for CCDF providers reflect generally accepted payment practices, including paying on a part-time or full-time basis rather than by smaller increments of time and paying for mandatory fees (such as registration fees) that providers charge private-paying parents (unless the Lead Agency can provide evidence that such practices are not generally accepted).
- ◆ The final rule requires, to the extent practicable, enrollment and eligibility policies that ensure that provider payments are not affected by a child's occasional absences by paying based on enrollment, making full payment if a child attends 85 percent of the time or misses 5 or fewer days in a month, or using an alternative approach.
- ◆ The final rule also requires timely payment for child care services (prospective payment or payment within 21 days of receiving invoice for services).

Market Rate Survey or Alternative Methodology Exemption

All AI/AN grantees are exempt from conducting a market rate survey or alternative methodology and all related requirements. Many AI/AN communities are located in rural isolated areas and conducting a market rate survey or alternative methodology is difficult. However, grantees receiving large or medium allocations are still required to have payment rates that support quality.

Family Engagement through Outreach and Consumer Education (requirements for medium- and large-allocation grantees)

Parents have the primary influence on their children's development and are their children's first and most important teachers. Parents are invaluable partners for child care programs, and they can work together to meet children's physical, emotional, social, and cognitive needs. One of the ways AI/AN grantees can promote parental involvement is through dissemination of consumer education information. In addition, consumer education provides information about child care services and assists parents in making informed choices.⁴³

Parental Choice and Access⁴⁴

Parents of children participating in child care should, to the maximum extent possible, have the opportunity to choose from the full range of eligible provider options for their children's care. Providing a range of services and supports honors families' needs and preferences for their children. Once care is chosen, parents must have unlimited access to their children, and to the providers caring for their children, during the program's operating hours. Lead Agencies must have a detailed description in the CCDF Plan of such procedures.

Large-allocation grantees are required to offer the parents of each CCDF-eligible child who receives assistance the choice to either enroll the child with an eligible child care provider that has a grant or contract for such services, or receive a child care certificate. Child care certificates, which may take the form of a check or other disbursement, are issued by grantees directly to parents, who may use them as payment for child care services or as a deposit for child care services.

Small- and medium-allocation grantees (\$1 million or less) are not required to operate a certificate program.

⁴³ Child Care and Development Fund, 45 C.F.R. § 98.33 (2016).

⁴⁴ Child Care and Development Fund, 45 C.F.R. §§ 98.30, 98.31 (2016).

Parental Complaints⁴⁵

AI/AN grantees with medium and large allocations are required to create or designate a hotline or similar reporting mechanism for parents to submit complaints about child care providers. There is flexibility regarding how this reporting process can be implemented—for example, the main reporting tool may be a phone number, a web form, or an email address. The complaint process and procedures should be included in the consumer statement for CCDF parents.

In addition to making the reporting process available to parents, grantees should establish processes for maintaining records of substantiated complaints (that is, complaints that are verified) and make information about these complaints available to the public if requested.

Medium- and large-allocation AI/AN grantees are required to describe in their CCDF Plans the processes that they will use for verifying (substantiating) and responding to parental complaints that come in, including information about whether or not monitoring is used as part of the process for responding to complaints for both CCDF and non-CCDF providers. In addition, they must describe how these records will be maintained and made available to the public.

Consumer and Provider Education

AI/AN CCDF grantees with medium and large allocations must collect and disseminate the provider-specific consumer education information described in the CCDF regulations at 45 C.F.R. §§ 98.33(a)–(d). AI/AN CCDF grantees are exempt from the requirement to have a consumer education website, and may disseminate consumer education information using other methods.⁴⁶

AI/AN grantees with large and medium allocations are required to meet the majority of consumer education provisions in the final rule, including the following:

◆ The dissemination of information to parents, providers, and the general public on the following:

- Tribal policies and procedures
- Provider-specific information
- Aggregate annual data on death, serious injuries, and instances of child abuse
- Referrals to local child care resource and referral organizations
- How parents can contact the Tribal Lead Agency or its designee and other programs for help understanding consumer education information
- Availability of child care and related services
- Research and best practices on child development, meaningful parent and family engagement, and physical health and development
- Policies regarding social-emotional and behavioral health
- Developmental screening

Tribal Lead Agencies are able to use CCDF funds to assist in providing consumer education and other educational information to eligible parents and families (and the general public) so they can make informed choices to best suit their child care needs. Tribal Lead Agencies may use CCDF funds to support the provision of assistance from community-based and regional resource and referral organizations.

⁴⁵ Child Care and Development Fund, 45 C.F.R. § 98.32 (2016).

⁴⁶ Child Care and Development Fund, 45 C.F.R. § 98.33 (2016).

- ◆ Provider-specific consumer education statements to help parents make informed choices about child care services and to promote involvement by parents and family members in the development of their children in child care settings.

Information provided should cover the availability of other child care services in the community, including services provided by the tribe, the state, and other entities. In addition, parents should be given information about the quality of child care, including how to select a high-quality provider.

All these materials should use plain language and consider the abilities, languages, and literacy levels of the audience. Translation of materials into multiple languages is encouraged, and people with disabilities should be informed about how they can access aids or services and receive the information in an alternative format.

Consumer Education Requirement Exemptions

All AI/AN grantees are exempt from the requirement to establish a consumer education website because of the administrative cost of building a website, as well as the lack of reliable high-speed Internet service in some tribal areas. However, AI/AN grantees are encouraged to implement a website and to work with state and local entities that maintain provider-specific information on a website.

Small-allocation grantees are not required to meet the consumer education requirements, but they can consider implementing them at their own accord as fits their community needs. If small-allocation grantees use their funds to directly serve children through center-based settings, the consumer education components can be helpful considerations for supporting quality services to families.

Health and Safety of Children in Child Care Settings (applicable to all grantees)⁴⁷

All grantees, regardless of whether they provide direct services, need to ensure that any child care program receiving CCDF dollars meets the health and safety requirements in the final rule, including, but not limited to, minimum health and safety standards, health and safety training, group size limits and ratios, emergency preparedness plans, and compliance with child abuse reporting requirements. The final rule allows AI/AN grantees to exempt relative care providers from the health and safety requirements.

Minimum Required Health and Safety Standards and Trainings

The CCDF final rule requires Tribal Lead Agencies to have standards (appropriate to provider setting and age of children served) that are designed, implemented, and enforced regarding 11 health and safety topics. These requirements should be subject to monitoring. In addition to these required topics, there are several recommended topics, including nutrition, physical activity, and caring for children with special needs. Grantees are also encouraged to identify other topics important to their communities.

- (i) The prevention and control of infectious diseases (including immunizations)
- (ii) Prevention of sudden infant death syndrome and use of safe sleeping practices
- (iii) Administration of medication, consistent with standards for parental consent
- (iv) Prevention and response to emergencies due to food and allergic reactions
- (v) Building and physical premises safety, including identification of and protection from hazards, bodies of water, and vehicular traffic

⁴⁷ Child Care and Development Fund, 45 C.F.R. § 98.41 (2016).

- (vi) Prevention of shaken baby syndrome, abusive head trauma, and child maltreatment
- (vii) Emergency preparedness and response planning for emergencies resulting from a natural disaster or a man-caused event (such as violence at a child care facility)
- (viii) Handling and storage of hazardous materials and the appropriate disposal of biocontaminants
- (ix) Appropriate precautions in transporting children, if applicable
- (x) Pediatric first aid and cardiopulmonary resuscitation
- (xi) Recognition and reporting of child abuse and neglect

The CCDF final rule requires that training on these topics be provided to caregivers, teachers, and directors in AI/AN CCDF programs. AI/AN CCDF grantees must provide preservice or orientation training regarding the required health and safety standards, as well as child development (including the major domains—cognitive, social, emotional, physical development, and approaches to learning). Caregivers, teachers, and directors must complete preservice or orientation training within 3 months of hire. Grantees are also required to provide ongoing professional development on the required health and safety topics. Ongoing professional development should also incorporate social-emotional behavior intervention models for children and, to the extent possible, should be appropriate for different age groups, English learners, and children with developmental delays and disabilities. Again, this includes all grantee allocation sizes, all provider types, and all types of care, even grantees that do not offer direct services.

Monitoring and Inspections⁴⁸

According to the final rule, all AI/AN CCDF grantees, regardless of allocation size, are subject to the rule's monitoring requirements. However, Tribal Lead Agencies may describe an alternative monitoring approach in their CCDF Plans. Alternative approaches are subject to ACF approval, and the CCDF Plan must provide adequate justification for the approach. By allowing tribes to describe alternative monitoring strategies in their plans, OCC intends to give Tribal Lead Agencies some flexibility in determining which monitoring requirements should apply to child care providers.

Tribes cannot use this flexibility to bypass the monitoring requirement altogether, but may introduce a monitoring strategy that is culturally appropriate or more financially feasible for their communities.

Lead Agencies must have requirements for health, safety, and fire monitoring and inspection as follows:

- ◆ Licensed or regulated CCDF providers:
 - One prelicensure inspection
 - An annual unannounced inspection
- ◆ License-exempt CCDF providers:
 - An annual inspection

Criminal Background Checks⁴⁹

- ◆ Background checks must include checks of the following:
 - FBI fingerprint check using Next Generation Identification

⁴⁸ Child Care and Development Fund, 45 C.F.R. § 98.42 (2016).

⁴⁹ Child Care and Development Fund, 45 C.F.R. § 98.43 (2016).

- Search of National Crime Information Center’s National Sex Offender Registry
- Search of the following registries in the state where the staff member lives and each state where the staff member has resided during the past 5 years:
 - State criminal repository, with fingerprint required in the state of residence and optional in other states
 - State sex offender registry
 - State child abuse and neglect registry
- ◆ Background checks are required for child care staff and for individuals age 18 or older residing in a family child care home
- ◆ Prospective staff members are allowed to provide services to children on a provisional basis (if supervised at all times) after completing and passing either an FBI fingerprint check or a State criminal repository check using fingerprints while the other background check components are being processed
- ◆ Tribal Lead Agencies may submit in their CCDF Plans an alternative approach to conducting full background checks on other individuals residing in family child care homes

Summary of Health and Safety Requirements

AI/AN grantees must certify that health and safety requirements are in place and applicable to those who are providing child care to children receiving subsidies, and must specify how they enforce the health and safety requirements. Providers must participate in a preservice or orientation training (within 3 months of providing care) that covers these health and safety topics.

Tribal Lead Agencies are subject to annual monitoring and comprehensive background check requirements. However, Tribal Lead Agencies may propose alternative monitoring strategies or alternative approaches to the full background check requirements in their CCDF Plans. Alternative plans are subject to ACF approval, and must include an adequate justification for the approach.

Continuous Quality Improvement (applicable to all grantees)

All grantees are required to spend a percentage of their total CCDF expenditures on quality improvement activities. Starting in FY 2017, AI/AN grantees will spend increasing minimum amounts on quality activities, reaching 9 percent in 2022. AI/AN grantees are given a phase-in period to allow time to plan for these quality increases each year. Starting in FY 2019, AI/AN grantees receiving large and medium allocations are also subject to the 3 percent infant and toddler quality spending requirement (AI/AN grantees with small allocations are exempt).⁵⁰

AI/AN Quality Spending Requirements

Fiscal Year	Quality Set-Aside (all grantees; %)	Infant/Toddler Set-Aside (large and medium allocations; %)	Total Quality Set-Aside (small allocations; %)	Total Quality Set-Aside (large and medium allocations; %)
FY 2017	4	0	4	4
FY 2018	7	0	7	7
FY 2019	7	3	7	10

⁵⁰ Child Care and Development Fund, 45 C.F.R. § 98.83(1) (2016).

Fiscal Year	Quality Set-Aside (all grantees; %)	Infant/Toddler Set-Aside (large and medium allocations; %)	Total Quality Set-Aside (small allocations; %)	Total Quality Set-Aside (large and medium allocations; %)
FY 2020	8	3	8	11
FY 2021	8	3	8	11
FY 2022 (and ongoing)	9	3	9	12

AI/AN grantees have the flexibility to implement a range of quality activities, and the scope of these efforts can be adjusted based on resources available so that even smaller Lead Agencies can effectively promote the quality of child care. Most Tribal Lead Agencies are likely already engaged in activities that count as quality improvement. Technical assistance is available to help AI/AN grantees identify current activities that may count toward the quality spending requirement, as well as appropriate new opportunities for quality spending.

It is strongly recommended that Tribal Lead Agencies carefully develop a framework for quality expenditures that takes account of the activities specified within the CCDF final rule. The CCDF final rule includes a list of 10 allowable quality activities and requires Tribal Lead Agencies to spend their quality funds on at least 1 of the 10 activities⁵¹. In addition, the CCDF final rule clearly states that quality activities are not restricted to those specifically targeting children who receive CCDF-funded care.

Examples of Quality Improvement Activities (not exhaustive; for illustrative purposes only)

Training and Professional Development Opportunities for Providers

- ◆ Develop training curricula
- ◆ Offer grants or stipends for attending training events
- ◆ Provide transportation
- ◆ Reimburse tuition and associated school attendance costs for associate’s degrees
- ◆ Pay for time off for training attendance
- ◆ Bring Child Development Associate (CDA) trainings onsite
- ◆ Make substitute providers available
- ◆ Provide trainings that relate to the use of evidence-based developmentally, culturally, and age-appropriate strategies
- ◆ Provide training that promotes all the major domains of child development and learning
- ◆ Provide training on gathering and using data to make adjustments in the physical environment and teaching practices
- ◆ Provide training on behavior management strategies and positive behavior interventions to promote positive social and emotional development
- ◆ Provide training and outreach on engaging parents and families in culturally and linguistically appropriate ways to expand their knowledge, skills, and capacity
- ◆ Provide training on nutrition and physical activity needs for young children
- ◆ Provide training regarding the neurological development of children

⁵¹ Child Care and Development Fund, 45 C.F.R. § 98.53 (2016).

Examples of Quality Improvement Activities (not exhaustive; for illustrative purposes only)

Compensation of Staff

- ◆ Supplement wages of staff
- ◆ Use sign-on bonuses to recruit providers for infant/toddler care or other areas of provider shortages
- ◆ Increase staff compensation in blended Head Start–child care programs to equalize salaries
- ◆ Give bonuses to providers for quality programs
- ◆ Implement cash and noncash career-ladder incentives

Health-Related Activities

- ◆ Connect providers with health consultants and specialists (for example, nutritionists, speech therapists)
- ◆ Conduct health screenings
- ◆ Conduct immunization events
- ◆ Incorporate diabetes prevention activities into curricula
- ◆ Provide car seats and professional installation

Cultural Activities

- ◆ Incorporate tribal language instruction into programs
- ◆ Invite storytellers to perform
- ◆ Identify and promote training opportunities for parents and providers
- ◆ Provide cultural training to non-Native providers

Promoting Family Literacy

- ◆ Plan a family literacy day
- ◆ Provide early reading materials and books for children
- ◆ Require daily reading to children
- ◆ Create a book lending library for providers
- ◆ Schedule a “Fathers’ Night Out” with storytelling, books, and puppets
- ◆ Open a computer lab
- ◆ Provide support for appropriate classroom activities

School-Age Activities

- ◆ Initiate cultural activities with elders (e.g., regalia making)
- ◆ Support culturally based summer youth programs
- ◆ Collaborate with Boys and Girls Clubs
- ◆ Develop a mentor program
- ◆ Connect with drug prevention programs
- ◆ Link with teen pregnancy prevention programs

Resource and Referral and Consumer Education

- ◆ Contract with state to provide resource and referral services
- ◆ Establish a resource library for parents and providers
- ◆ Develop newsletters for providers and parents

Examples of Quality Improvement Activities (not exhaustive; for illustrative purposes only)

- ◆ Create parent handbooks
- ◆ Start a toy lending library
- ◆ Develop internet-based consumer education on quality child care

Other Quality Activities

- ◆ Fund field trips
- ◆ Provide funds or equipment for library or Internet access
- ◆ Establish intergenerational centers

Appendix A. Getting Started as a New Administrator

Now that you've reviewed the basics of running an AI/AN CCDF program, here are some actions you can take to help you reach your goals for meeting the child care needs of the children and families in your tribal community.

Review the most current CCDF Plan your tribe has submitted. If a copy is not readily available, you may wish to contact your OCC regional office to obtain a copy.

Connect with staff at your OCC regional office and provide them with your contact information so you can be sure to receive federal updates, guidance, and information. See appendix B, Federal CCDF Contacts and Resources.

Connect with your tribe's fiscal office and review the program budget to ensure that it can support the activities described in the current CCDF Plan. Be familiar with timelines for funding and reporting. See appendix E, CCDF Dates to Remember.

Review program management policies and procedures and update as needed.

Review the timelines for public hearings, market rate surveys, and other requirements. See appendix E, CCDF Dates to Remember.

Get to know the needs of the families who are using child care services and those who may need services.

- ◆ Is there a current community needs assessment?
- ◆ If your tribe operates a Head Start program, review the Head Start community assessment. If you decide that a new community assessment needs to be conducted, review the suggestions in chapter 2 of *Tribal Child Care Facilities: A Guide to Construction and Renovation*.⁵²
- ◆ Are child care services accessible and affordable, and do they provide a level of quality to ensure that the developmental needs of the children are met?
- ◆ Do the available programs and services meet the needs of working families?
- ◆ Are families active partners in CCDF program planning and implementation?
- ◆ Do families have the information they need to make the best decisions for their children's care?

Get to know the child care providers and other early childhood programs in the community.

- ◆ Are the services meeting the needs of infants, toddlers, and prekindergarten and school-age children so they can develop to their fullest potential?
- ◆ Do the programs and services incorporate native culture and language to preserve cultural heritage and traditions and promote linguistic continuity?
- ◆ Do services meet the needs of working families (for example, schedules and locations)?
- ◆ What is needed to recruit and retain a high-quality child care workforce?
- ◆ Is there a professional development plan that enables child care staff and providers to increase their knowledge and competencies?

⁵²Child Care Bureau, Administration for Children and Families, U.S. Department of Health and Human Services. (2006). Tribal child care facilities: A guide to construction and renovation. Retrieved from <http://files.eric.ed.gov/fulltext/ED498553.pdf>.

- ◆ Is the subsidy rate paid through contracts or certificates adequate to ensure that providers are able and willing to participate in your subsidy program so affordable care is available to families who need it?

Keep current on new information and resources to support tribal child care. Visit the web pages for the Office of Child Care (<http://www.acf.hhs.gov/programs/occ/>) and the National Center on Tribal Early Childhood Development (<https://childcareta.acf.hhs.gov/centers/national-center-tribal-early-childhood-development>) to find resources such as policy guidance, frequently asked questions, and a list of AI/AN grantees.

Build partnerships with other tribal, state, and community programs that serve children and families. Take advantage of opportunities to network and share ideas, successes, and challenges with other AI/AN CCDF Administrators. Participate in local, state, regional, and national child care conferences and training activities.

Take time to renew your spirit and energy. Your health, strength, and wellness are vital to you, your family, and the children and families you work to support. By being physically and emotionally healthy, you will not only strengthen your ability to work on behalf of children and families, you will also model the wellness you wish to see in your staff, your clients, and your community. The Indian Health Service (IHS) (<https://www.ihs.gov/>), an agency within the Department of Health and Human Services, offers online resources to support physical, mental, social, and spiritual health in AI/AN individuals and communities. Their health topics web page (<https://www.ihs.gov/forpatients/healthtopics/>) has information and resources on a variety of health-related subjects. They also have pages dedicated to supporting health promotion (<https://www.ihs.gov/communityhealth/hpdp/>) and behavioral health (<https://www.ihs.gov/communityhealth/behavioralhealth/>). In addition, the Substance Abuse and Mental Health Services Administration (SAMHSA) within the Department of Health and Human Services has a web page (<https://www.samhsa.gov/tribal-affairs>) dedicated to supporting mental health and substance use issues in AI/AN communities. SAMHSA's Tribal Training and Technical Assistance Center (<https://www.samhsa.gov/tribal-ttac>) offers training and resources on mental and substance use disorders, suicide prevention, and mental health promotion. Their mental health resources page (<https://www.samhsa.gov/tribal-ttac/resources/mental-health-promotion>) can help connect users to organizations, articles, and other resources that AI/AN communities can use to promote mental wellness.

Appendix B. Federal CCDF Contacts and Resources

Office of Child Care Training and Technical Assistance Resources	
<p>Office of Child Care</p> <p>Administration for Children and Families U.S. Department of Health and Human Services 330 C Street, S.W. Washington, D.C. 20201</p> <p>Phone: (202) 690-6782 Fax: (202) 690-5600</p> <p>http://www.acf.hhs.gov/programs/occ</p>	<p>National Center on Tribal Early Childhood Development</p> <p>9300 Lee Highway Fairfax, VA 22031</p> <p>Phone: 877-296-2401 Email: nctecd@ecetta.info</p> <p>https://childcareta.acf.hhs.gov/centers/national-center-tribal-early-childhood-development</p>
<p>National Center on Child Care Data and Reporting</p> <p>2600 Tower Oaks Blvd., Suite 600 Rockville, MD 20852</p> <p>Phone (toll-free): 1-877-249-9117 Fax: (301) 692-0700 Email: ncdt@childcaredata.org</p> <p>https://childcareta.acf.hhs.gov/centers/national-center-child-care-data-and-reporting</p>	<p>Early Childhood Training and Technical Assistance System</p> <p>In addition to NCTECD, ACF offers CCDF grantees information, tools, training, and other supports by funding a network of national centers focusing on early childhood services.</p> <p>To learn more and find resources, visit the Child Care Technical Assistance website</p>

Office of Child Care Regional Program Offices	
<p>Region I</p> <p><i>(Connecticut, Maine, Massachusetts, New Hampshire, Rhode Island, Vermont)</i></p> <p>HHS/ACF JFK Federal Building, Suite 2025 15 New Sudbury Street Boston, MA 02203</p> <p>Phone: (617) 565-1152 Fax: (617) 565-1578</p>	<p>Region II</p> <p><i>(New Jersey, New York, Puerto Rico, Virgin Islands)</i></p> <p>HHS/ACF 26 Federal Plaza, Room 4114 New York, NY 10278</p> <p>Phone: (212) 264-2890 X182 Fax: (212) 264-4881</p>
<p>Region III</p> <p><i>(Delaware, District of Columbia, Maryland, Pennsylvania, Virginia, West Virginia)</i></p> <p>HHS/ACF 150 S. Independence Mall West Public Ledger Bldg., Suite 864 Philadelphia, PA 19106-3499</p> <p>Phone: (215) 861-4058 Fax: (215) 861-4070</p>	<p>Region IV</p> <p><i>(Alabama, Florida, Georgia, Kentucky, Mississippi, North Carolina, South Carolina, Tennessee)</i></p> <p>HHS/ACF Atlanta Federal Center 61 Forsyth Street, S.W. Atlanta, GA 30303-8909</p> <p>Phone: (404) 562-2782 Fax: (404) 562-2985</p>

Office of Child Care Regional Program Offices	
<p>Region V <i>(Illinois, Indiana, Michigan, Minnesota, Ohio, Wisconsin)</i></p> <p>HHS/ACF 233 N. Michigan Ave., Suite 400 Chicago, IL 60601</p> <p>Phone: (312) 353-3270 Fax: (312) 353-2629</p>	<p>Region VI <i>(Arkansas, Louisiana, New Mexico, Oklahoma, Texas)</i></p> <p>HHS/ACF 1301 Young Street, Suite 914 Dallas, TX 75202</p> <p>Phone: (214) 767-3849 Fax: (214) 767-8890</p>
<p>Region VII <i>(Iowa, Kansas, Missouri, Nebraska)</i></p> <p>HHS/ACF Federal Office Building, Room 276 601 East 12th Street Kansas City, MO 64106</p> <p>Phone: (816) 426-2264 Fax: (816) 426-2888</p>	<p>Region VIII <i>(Colorado, Montana, North Dakota, South Dakota, Utah, Wyoming)</i></p> <p>HHS/ACF 999 18th Street South Terrace, Suite 499 Denver, Colorado 80202</p> <p>Phone: (303) 844-1164 Fax: (303) 844-3642</p>
<p>Region IX <i>(American Samoa, Arizona, California, Commonwealth of the Northern Mariana Islands, Guam, Hawaii, Nevada)</i></p> <p>HHS/ACF 90 7th Street, 9th Floor San Francisco, CA 94103</p> <p>Phone: (415) 437-8439 Fax: (415) 437-8436</p>	<p>Region X <i>(Alaska, Idaho, Oregon, Washington)</i></p> <p>HHS/ACF Blanchard Plaza 2201 Sixth Avenue, Room 610 M/S RX-70 Seattle, WA 98121</p> <p>Phone: (206) 615-2609 Fax: (206) 615-2574</p>

Appendix C. Sample Quality Activities from AI/AN CCDF Administrators

The following list represents examples of quality activities shared by AI/AN CCDF Administrators. Please note that this list is not exhaustive and is for illustrative purposes only; it is not intended as guidance as to whether any specific activity is allowable. At a minimum, the activities described below would need to occur within the context of AI/AN early childhood care and education programs or services in order to be allowable under CCDF. Questions about whether activities are allowed should be addressed to the Office of Child Care. All quality activities should be planned and evaluated to ensure that they meet the program's goals.

Examples of Quality Improvement Activities (not exhaustive; for illustrative purposes only)

Training and Professional Development Opportunities for Providers (training topics)

- ◆ Orientation to CCDF program
- ◆ Child development
- ◆ Behavioral issues
- ◆ Cultural training
- ◆ Infant and toddler child care
- ◆ First aid
- ◆ Computer skills
- ◆ Child care as a business

Licensing, Monitoring, and Assisting Providers in Meeting Standards

- ◆ Develop provider standards
- ◆ Conduct background checks
- ◆ Conduct monitoring visits
- ◆ Provide health and safety materials and equipment, as determined by inspection
- ◆ Offer direct grants or minigrants for health and safety equipment and materials
- ◆ Provide needed classroom materials and resources
- ◆ Provide funds toward cost of provider licensing
- ◆ Offer immunizations

Strategies for Making Training Accessible

- ◆ Offer grants or stipends for attending training events
- ◆ Provide transportation
- ◆ Provide training onsite at centers and homes
- ◆ Reimburse tuition and associated school attendance costs for associate's degree
- ◆ Pay for time off for training attendance
- ◆ Bring Child Development Associate (CDA) trainings onsite
- ◆ Make substitute providers available

Examples of Quality Improvement Activities (not exhaustive; for illustrative purposes only)

Resource and Referral and Consumer Education

- ◆ Contract with state to provide resource and referral services
- ◆ Establish a resource library for parents and providers
- ◆ Develop newsletters for providers and parents
- ◆ Create parent handbooks
- ◆ Start a toy lending library
- ◆ Develop internet-based consumer education on quality child care

Compensation of Staff

- ◆ Supplement wages of staff
- ◆ Use sign-on bonuses to recruit providers for infant/toddler care or other areas of provider shortages
- ◆ Increase staff compensation in blended Head Start and child care programs to equalize salaries
- ◆ Give bonuses to providers for quality programs
- ◆ Implement cash and noncash career-ladder incentives

School-Age Activities

- ◆ Initiate cultural activities with elders (for example, regalia making)
- ◆ Support culturally based summer youth programs
- ◆ Collaborate with Boys and Girls Clubs
- ◆ Develop a mentor program
- ◆ Connect with drug prevention programs
- ◆ Link with teen pregnancy prevention programs

Cultural Activities

- ◆ Incorporate tribal language instruction into programs
- ◆ Invite storytellers to perform
- ◆ Identify and promote training opportunities for parents and providers
- ◆ Provide cultural training to non-Native providers

Health-Related Activities

- ◆ Connect providers with health consultants and specialists (for example, nutritionists and speech therapists)
- ◆ Conduct health screenings
- ◆ Conduct immunization events
- ◆ Incorporate diabetes prevention activities into curricula
- ◆ Provide car seats and professional installation

Examples of Quality Improvement Activities (not exhaustive; for illustrative purposes only)

Promoting Family Literacy

- ◆ Plan a family literacy day
- ◆ Provide early reading materials and books for children
- ◆ Require daily reading to children
- ◆ Create a book lending library for providers
- ◆ Schedule a “Fathers’ Night Out” with storytelling, books, and puppets
- ◆ Open a computer lab
- ◆ Provide support for appropriate classroom activities

Other Quality Activities

- ◆ Fund field trips
- ◆ Provide funds or equipment for library or Internet access
- ◆ Establish intergenerational centers

Appendix D. Potential Collaborative Partners for AI/AN CCDF Programs

The following list represents examples of collaborative partners shared by AI/AN CCDF Administrators. This list is not exhaustive and is for illustrative purposes only.

Early Childhood

- ◆ State CCDF program
- ◆ Other AI/AN CCDF programs
- ◆ Head Start programs
- ◆ Early Head Start programs
- ◆ Afterschool programs
- ◆ Private preschool programs
- ◆ Family child care home networks
- ◆ Brazelton Touchpoints Center
- ◆ National organizations that support children and families

Education

- ◆ Tribal colleges and universities
- ◆ Other colleges and universities
- ◆ Tribal and local schools and school districts
- ◆ Technical schools
- ◆ State Department of Education
- ◆ State special education services

Employment and Training

- ◆ Tribal Temporary Assistance for Needy Families (TANF) program
- ◆ Tribal Native Employment Works
- ◆ State TANF program
- ◆ Vocational rehabilitation programs
- ◆ U.S. Department of Labor Summer Youth Employment programs
- ◆ Workforce Investment Act programs
- ◆ State apprenticeship programs
- ◆ Industrial parks

Health

- ◆ Indian Health Service
- ◆ Office of Environmental Health
- ◆ U.S. Department of Agriculture (USDA) Child and Adult Care Food Program
- ◆ Early intervention programs
- ◆ American Red Cross
- ◆ Maternal and Child Health
- ◆ Even Start
- ◆ USDA Special Supplemental Nutrition Program for Women, Infants, and Children
- ◆ Alcohol and drug abuse programs

Other Collaborative Partners

- ◆ Resource and referral agencies
- ◆ Libraries (tribally operated and local)
- ◆ Elder programs
- ◆ Law enforcement agencies
- ◆ Indian Child Welfare
- ◆ Private foundations
- ◆ YMCA and YWCA
- ◆ Foster Grandparents Program
- ◆ AmeriCorps and other national and community service programs
- ◆ Housing programs
- ◆ Parks and recreation departments
- ◆ Consortia of churches and other religious organizations
- ◆ Boys and Girls Clubs
- ◆ T.E.A.C.H. Early Childhood programs
- ◆ Tribally funded summer programs
- ◆ Teen pregnancy prevention programs
- ◆ Native American cultural camps
- ◆ Mentor programs
- ◆ Tribal courts
- ◆ Tribal women's groups
- ◆ Local theaters
- ◆ Bureau of Indian Affairs Social Services programs

Appendix E. CCDF Dates to Remember

CCDF Administrative Tasks	Years New CCDF Plan Is Due	Years CCDF Plan Is Not Due
Public hearing on CCDF Plan	January 1–July 1 <i>(at least one hearing must be held in this timeframe)</i>	Not due
Discretionary reallocation letter	April 1 <i>(for funds from the previous fiscal year)</i>	April 1 <i>(for funds from the previous fiscal year)</i>
Triennial Tribal CCDF Plan* <i>(including Child Count Declaration)</i>	July 1	Not due
Funding application and Child Count Declaration	July 1 <i>(submitted with CCDF Plan)</i>	Not due
Construction application	July 1 <i>(for current fiscal year funds only)</i>	July 1 <i>(for current fiscal year funds only)</i>
Obligation and liquidation deadline	September 30	September 30
New fiscal year funds available	October 1	October 1
ACF-696T fiscal reports*	December 29 <i>(reports for 3 previous fiscal years due 90 days after the end of the fiscal year; final reports may be submitted earlier upon liquidation of funds)</i>	December 29 <i>(reports for previous fiscal year due 90 days after the end of the fiscal year; final reports may be submitted earlier upon liquidation of funds)</i>
ACF-700 report*	December 31 <i>(covers program activities during the previous period of October 1–September 30)</i>	December 31 <i>(covers program activities during the previous period of October 1–September 30)</i>

*Denotes items that do not apply to grantees electing to operate a CCDF program under a consolidated P.L. 102–477 plan as described on pages 5–6.


Appendix F. Summary of Key Terms

As described earlier, the CCDBG Act of 2014 is the **law**; the Child Care and Development Fund (CCDF) **final rule** defines how the law applies to grantees; and, the Tribal CCDF Plan is the Tribal Lead Agency's **description** of its plan to implement the CCDF program.

CCDBG Act of 2014	This law reauthorizes the Child Care and Development Fund (CCDF) and makes significant advances by defining health and safety requirements for child care providers, outlining family-friendly eligibility policies, and ensuring that parents and the general public have transparent information about the child care choices available to them. However, as previously mentioned, many provisions in the law do not apply to AI/AN grantees. This is where the CCDF final rule comes into play.
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CCDF final rule	The CCDF final rule , consisting of both a preamble and corresponding rule sections, defines how the law applies to AI/AN grantees. The preamble provides a summary of the rule's provisions, supplementary information, and a description of public comments received and responses to those comments.
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CCDF Plan	The CCDF Plan serves as the application for CCDF funds by providing a description of, and assurance about, the Tribal Lead Agency's child care program and all services available to eligible families.
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