Supporting Continuity through Child Care and Development Fund Subsidies: A Review of Select State Policies

Issue Brief OPRE 2014-32
March 2014

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OPRE Research Brief #2014-32
March 2014

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Submitted to:
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Administration for Children and Families
U.S. Department of Health and Human Services

Contract Number: HHSP23320095631WC

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Suggested citation: Forry, N., Daneri, P., Minton, S. & Durham, C. (2014). Supporting Continuity through Child Care and Development Fund Subsidies: A Review of Select State Policies. OPRE Research Brief #2014-32. Washington, DC: Office of Planning, Research and Evaluation, Administration for Children and Families, U.S. Department of Health and Human Services.

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This report and other reports sponsored by the Office of Planning, Research and Evaluation are available at http://www.acf.hhs.gov/programs/opre/index.html.

Acknowledgments: The authors would like to thank Kathleen Dwyer of the Office of Planning, Research and Evaluation and Linda Giannarelli of the Urban Institute for their initial input on this brief. The authors would also like to thank Kathryn Tout, Tamara Halle, Kathleen Dwyer, Dawn Ramsburg, and Naomi Goldstein for their reviews of this product.

Overview

This brief was produced as part of the Child Care and Early Education Policy and Research Analysis and Technical Expertise Project. The purpose of this project is to support the provision of expert consultation, assessment and analysis in child care and early education policy and research. It is funded through a contract with the Office of Planning, Research and Evaluation.

This brief was co-authored by researchers at Child Trends and the Urban Institute and uses data from the Child Care and Development Fund (CCDF) Policies Database to highlight similarities and differences in states on select subsidy policies that may be related to the continuity of subsidy receipt and/or the continuity of subsidized arrangements among eligible families. State-level data extracted as of October 1, 2012, from the CCDF Policies Database were used to develop maps and tables that can be used to compare and contrast states on three key policies: eligibility redetermination periods and policies related to changes in eligibility, tiered income eligibility, and what allowances states make for job search activities at initial application and redetermination. Information provided in this brief may be used to contextualize research findings across states and to inform conversations about facilitating continuity in subsidized care among state administrators.

Key Findings

- **Eligibility Redetermination and Policies Related to Changes in Eligibility or Benefits.** As of October 1, 2012, 23 states set eligibility redetermination periods at 6 months, 25 states and the District of Columbia set redetermination periods at 12 months, and of the remaining two states, one (Connecticut) used a redetermination period of 8 months and the other (Texas Education Agency) varied redetermination periods by region. States also vary regarding how far in advance they notify families of changes in their subsidy benefits and how they handle subsidy benefits during breaks in school and employment.

- **Tiered Income Eligibility.** Sixteen states and the District of Columbia offer tiered income eligibility. The difference between income eligibility at application and redetermination varies across these states (range of 8% to 70% allowable increase), with the median allowable increase in income being 24%.

- **Subsidy Benefits During Job Search.** Sixteen states allow job search as an approved employment-related activity only when a parent has already been approved for a subsidy. Twenty-one states and the District of Columbia include job search as an approved employment-related activity for families applying for or continuing to receive a child care subsidy. States also vary in the number of allowable job searches per year and time limits imposed on job search activities.

Executive Summary

Continuity in care arrangements has been linked to several positive outcomes related to children's attachment and cognitive development (Elicker, Fortner-Wood, & Noppe, 1999; Loeb, Fuller, Kagan, & Carrol, 2004). Child care subsidies can help low-income families afford high-quality, reliable care, and thus may facilitate continuity in care arrangements. Indeed, research has found that low-income families who receive child care subsidies are more likely to have stable care arrangements than low-income families without child care subsidies (Brooks, Risler, Hamilton, & Nackerud, 2002; Danziger, Ananat, & Browning, 2003).

In order to help inform the choices of state administrators seeking to facilitate continuity in subsidized care, this brief reviews current Child Care and Development Fund (CCDF) state policies, compiled through the CCDF Policies Database,[1] as well as research related to these policies. Specifically, this brief reviews state policies[2] which have been associated with continuity in subsidized care through research, or are theorized to be associated with continuity based on related research on low-income families. These policies are: eligibility redetermination periods and policies related to changes in eligibility or benefits, tiered income eligibility, and whether subsidies are provided for job searches. Key findings related to each of these topics are presented below.

- **Eligibility Redetermination and Policies Related to Changes in Eligibility or Benefits.** Research has shown the length of the eligibility redetermination period to be positively associated with the length of time families continuously receive a subsidy (Grobe, Weber, & Davis, 2008; Meyers, et al., 2002; Michalopolous, Lundquiest, & Castells, 2010). As of October 1, 2012, 23 states set eligibility redetermination periods at 6 months, 25 states and the District of Columbia set redetermination periods at 12 months, and of the remaining two states, one (Connecticut) used a redetermination period of 8 months and the other (Texas Education Agency) varied redetermination periods by region. States also vary regarding how far in advance they notify families of changes in their subsidy benefits and how they handle subsidy benefits during breaks in school and employment.

- **Tiered Income Eligibility.** Tiered income eligibility, or the establishment of higher income eligibility thresholds at redetermination than application, allows families currently receiving a child care subsidy to continue to receive assistance as they work to increase their income. Sixteen states and the District of Columbia offer tiered income eligibility. The difference between income eligibility at application and redetermination varies across these states (range of 8% to 70% allowable increase), with the median allowable increase in income being 24%.

- **Subsidy Benefits During Job Search.** Offering subsidy benefits during a job search can facilitate continuity of care during periods of employment instability. States vary in their provision of subsidy benefits during job searches on a few different dimensions. Sixteen states allow job search as an approved employment-related activity only when a parent has already been approved for a subsidy. Twenty-one states and the District of Columbia include job search as an approved employment-related activity for families applying for or continuing to receive a child care subsidy. States also vary in the number of allowable job searches per year and time limits imposed on job search activities.

Information provided in this brief may be used to contextualize research findings across states and to inform future policy decisions aimed at facilitating continuity in subsidized care.

[1] The CCDF Policies Database is available online: http://www.acf.hhs.gov/programs/opre/research/project/child-care-and-development-fund-ccdf-policies-database-2008-2013

[2] State policies reported in this brief are based on data collected as of October 1, 2012.

SUPPORTING CONTINUITY THROUGH CHILD CARE AND DEVELOPMENT FUND SUBSIDIES: A REVIEW OF SELECT STATE POLICIES

Introduction

Over half (54%) of children under the age of five are cared for in a non-parental care arrangement at least once per week according to the latest data collected by the U.S. Census Bureau (Laughlin, 2013). Recent research based on the NICHD Study of Early Child Care has found that, among children in non-parental care arrangements, 39% experience a change in child care provider within three months during their first 15 months of life (Tran & Weinraub, 2006). Changes or disruptions in the continuity of care for young children are particularly prominent among low-income families (Weber, 2005).

The prevalence of child care changes is a noteworthy issue, as continuity in care arrangements has been linked to several positive outcomes related to children's attachment and cognitive development (Elicker et al., 1999; Loeb et al., 2004). For example, a positive association has been found between the number of months a child is with a caregiver and that child's secure attachment to the caregiver (Elicker et al., 1999). Also, Loeb and colleagues (2004) found that the number of months a child attended the same center is positively associated with cognitive development in a sample of children whose mothers participated in a welfare-to-work program.

Subsidies and Continuity

Subsidies may assist low-income families in maintaining continuity of care by allowing parents to purchase care they would not otherwise afford, and in turn enabling families to choose more reliable providers. Studies comparing families with similar demographic characteristics who did and did not receive child care subsidies have found that children in subsidized care tend to have more stable care than children who are not in subsidized care (Brooks et al., 2002; Danziger et al., 2003; Michalopolous, Lundquiest, & Castells, 2010). However, children receiving child care subsidies still experience some discontinuity in care. Using administrative data from Illinois, Anderson, Ramsburg, and Scott (2005) found that over a period of three years, half of the subsidy-receiving population had experienced at least one change in child care arrangements. Similarly, Weber's (2005) analysis of Oregon administrative data showed that approximately 30% of children in subsidized care changed primary care providers over a 12-month period.

The Child Care and Development Fund (CCDF) is the largest child care subsidy program in the U.S. The purpose of the CCDF program is to "assist low-income families in obtaining child care so they can work or attend training/education" (Office of Child Care, 2012b). Additionally, the program "improves the quality of child care and promotes coordination among early childhood development and afterschool programs" (Office of Child Care, 2012b). CCDF reduces parents' out-of-pocket expenses for the care of children age birth to 13 years in a range of settings, including center care, family child care, and care in the child's own home. In 2010, the CCDF program served approximately 1.7 million children per month (Office of Child Care, 2012a). Among children served, all of whom lived in households that met state income eligibility criteria, almost half lived in families whose income was below the federal poverty level (Office of Child Care, 2012a). CCDF is a block grant to states and territories. Though the Office of Child Care offers guidance regarding the administration of this program, it is up to states/territories to determine how much they will invest in the program, and how funds will be allocated across different policy levers, including income eligibility thresholds, application and recertification requirements, and licensing/quality regulations for providers serving subsidized children. Recent guidance from the Office of Child Care, which reflects the Government Performance and Results Act (GPRA) CCDF Performance Measures and High Priority Performance Goals, highlights the program's emphasis on supporting families in selecting high quality care and facilitating continuity in care arrangements (Office of Child Care, 2011a, 2011b, 2011c, 2011d). A few CCDF policies have been associated with continuity in subsidized care arrangements through research. This brief examines how states are currently implementing a few specific policies in an effort to help contextualize state-based and cross-state research and to encourage further discussion among state administrators regarding how CCDF policies can be used to facilitate continuity within subsidized care arrangements.

Purpose of Brief

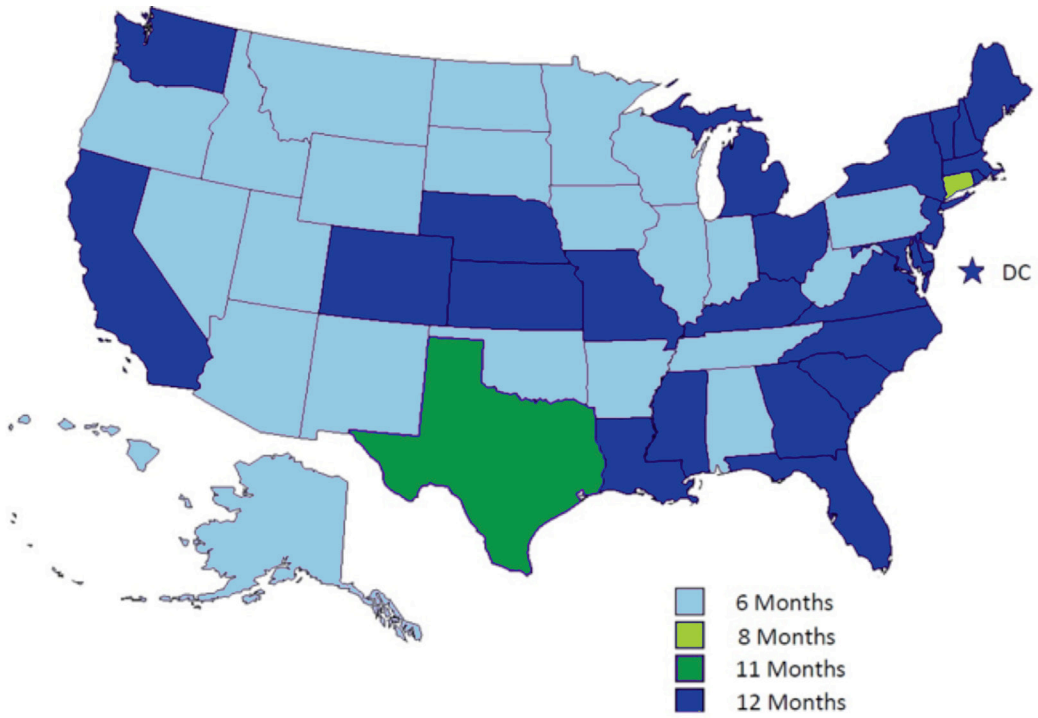
The purpose of this brief is to review select CCDF state policies that have been, or may be, associated with exits from the subsidy program. Though a consistent link between subsidy exits and changes in children's care arrangements has not been clearly established in the literature, these policies are worthy of review, as they serve as potential intervention points for subsidy administrators to facilitate continuity of care through CCDF subsidies. In this brief, we will specifically review state policies, as of October 1, 2012, related to the length of subsidy redetermination periods and other policies related to changes in eligibility, variation in income eligibility thresholds from program entry to redetermination, and allowable breaks in employment-related activities for families applying for or redetermining subsidy eligibility. Policies summarized in this brief are based on data from the Child Care and Development Fund Policies Database, available at http://www.acf.hhs.gov/programs/opre/research/project/child-care-and-development-fund-ccdf-policies-database-2008-2013.[3]

[3] Though policies of U.S. territories are not included in this brief, they are included in the CCDF Policies Database.

Eligibility Redetermination and Other Policies Related to Changes in Eligibility or Benefits

One set of policies that may affect continuity of care relates to the length of eligibility redetermination periods, and how changes in family circumstances and activities that occur before or after the redetermination process are handled. Families receiving child care assistance are required to "redetermine" their eligibility a specified number of months after their initial enrollment. The redetermination process involves the family resubmitting documentation to verify that they continue to qualify for assistance. The number of months a family may receive a subsidy prior to completing eligibility redetermination is referred to as the redetermination period. Research exploring continuity of care and subsidy receipt has found the length of time a child's care is continuously subsidized to be associated with the length of the subsidy redetermination period, with subsidy exits being more likely to occur at the time of redetermination, even among families that remain eligible for the program (Grobe, Weber, & Davis, 2008; Meyers et al., 2002; Michalopolous et al., 2010). Current research on changes in child care arrangements associated with subsidy exits yields inconsistent results, with some research teams finding only a small percentage of families return to the same provider when starting a new subsidy spell (Ha, Magnuson, & Ybarra, 2012; Weber, 2005) and other research teams finding a high proportion of families use the same provider across subsidy spells (Layzer and Goodson,(2006); Ros, Claessens et al., 2012). Longer redetermination periods may support continuity in subsidized care arrangements by minimizing the burden on families to complete subsidy verification and administrative processes, though more research on this topic is needed.

Figure 1. Redetermination Periods across the 50 States and the District of Columbia



Note: Redetermination periods in Texas are determined at the regional level. The redetermination period shown here is for the Gulf Coast Region. When policies vary within a state, the CCDF Policies Database reflects the policies for the most populous area of the state.

As shown in Figure 1, the length of the redetermination period varies across states. Redetermination periods are most commonly set at either 6 or 12 months. In 2012, 23 states set redetermination periods at 6 months, while half the states (25) and the District of Columbia set longer redetermination periods of 12 months. In two states, different redetermination periods were set, with Connecticut using an 8-month period and the Gulf Coast Region of Texas using an 11-month period.

In addition to setting the length of the redetermination period, states also have policies in place for handling changes in family circumstances and activities that occur before or after the redetermination process has been completed. Changes in specific circumstances (e.g., hours per week spent in employment-related activities or increases in family income) may result in a change in subsidy benefit level or in discontinuation of services (if the family no longer meets program eligibility requirements). State policies for notifying families about changes in benefit levels resulting from changes in the families' circumstances affect the amount of time parents have to make any necessary adjustments to their child care arrangement. For example, with more advanced notice, families have more time to potentially make alternative payment arrangements with their current provider in order to maintain consistent care. State policies for notifying families of decreases in benefits vary widely. The majority of the states require notification to be sent to families 10 days prior to a reduction in benefits, while some states require as much as 30 days advance notice and others require no notification.

Additionally, states may opt to maintain subsidy benefits during leaves of absence from work due to medical or other issues, during school breaks for parents qualifying under education activities, or during maternity/paternity leave. Maintaining subsidy benefits during these leaves of absence can allow for continuity in care despite changes in a family's circumstances. A little less than half the states provide care during school breaks and during maternity leave, with specific policies and time limits varying across the states. Other states suspend subsidy benefits so they can be easily resumed once the parent returns to an eligible activity, while still others do not provide care or hold child care slots for the families.

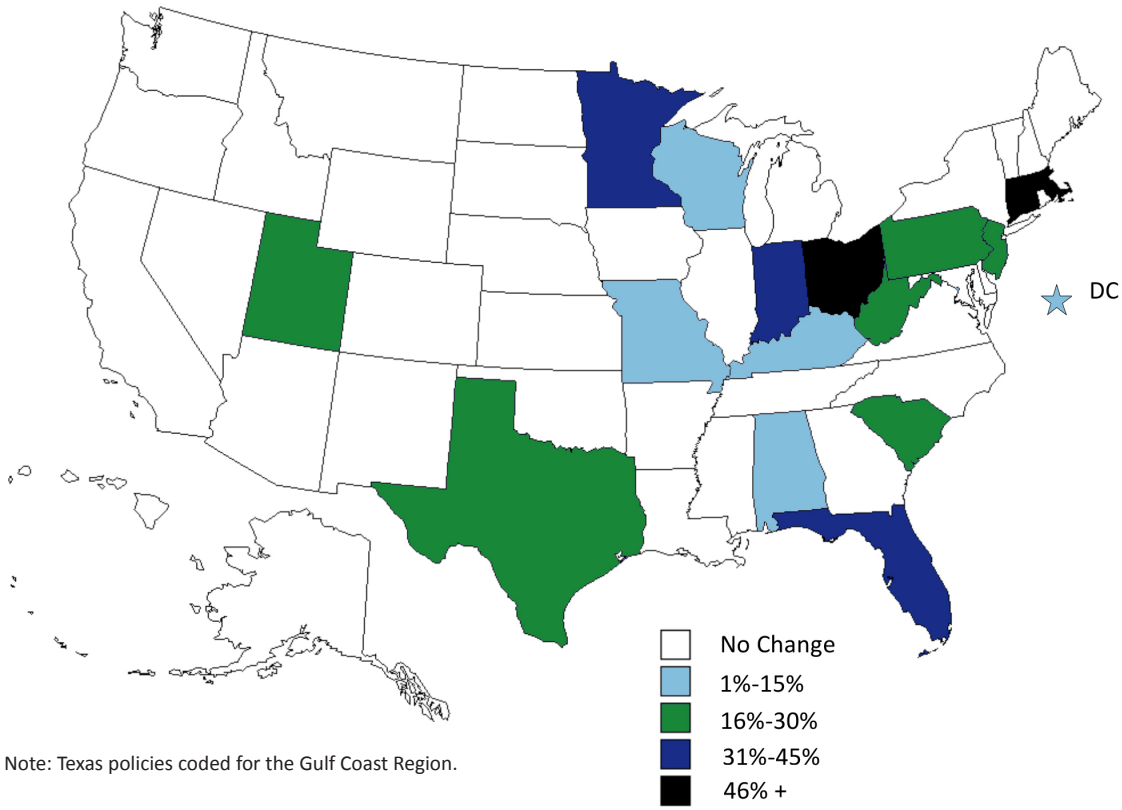
Tiered Income Eligibility

The federal guidelines for CCDF require that eligible families have an income below 85% of the state median income. States may choose to set their income eligibility thresholds below 85% of the state median income, and they may also choose to establish different income eligibility thresholds, or tiered income eligibility, for families newly entering the assistance program versus those who are redetermining eligibility. Tiered income eligibility allows families currently receiving a child care subsidy to continue receiving assistance as their income increases. In other words, it permits families to work towards increasing their income without immediately losing their child care benefits. As families with more financial resources may be better able to afford care, this policy may facilitate families' ability to maintain care arrangements once they are no longer eligible to receive a child care subsidy.

Across the states, initial monthly income eligibility thresholds for a family of three range from $1,854 in Nebraska to $4,524 in Alaska, with a median threshold across all states and the District of Columbia of $2,864.[4] These initial eligibility thresholds represent the highest countable income a family can have and still qualify for child care assistance at initial application.

[4] In three states the eligibility thresholds are established at the local level, varying across the state. In these states, this analysis uses the threshold for the largest County or area in the state. The sub-state thresholds used are for Denver, Colorado, the Gulf Coast Region in Texas, and Group III areas in Virginia.

Figure 2. Percent Change Comparing Initial and Continuing Income Eligibility Thresholds across the 50 States and the District of Columbia



Note: Texas policies coded for the Gulf Coast Region.

Sixteen states and the District of Columbia implement tiered income eligibility, as shown in Figure 2. In these states, the continuing eligibility thresholds for a family of three range from $2,145 per month in Missouri to $5,964 per month in Massachusetts. Compared to the initial eligibility thresholds used in the 16 states and the District of Columbia, the difference between initial and continuing income eligibility thresholds range from 8% in Wisconsin to 70% in Massachusetts, with a median increase of 24%. Using Wisconsin and Massachusetts as examples, with the state tiered income eligibility policies, a three-person family in Wisconsin could earn up to $239 above the initial income eligibility limit and remain eligible for a subsidy, and a family in Massachusetts could earn up to $2,456 above the initial income limit and remain eligible. Four states and the District of Columbia set their continuing eligibility thresholds at less than 16% above the initial threshold, six states set the thresholds at 16% to 30% above the initial limits, and three states set the thresholds at 31% to 45% above the initial limits. Only two states set their continuing eligibility thresholds at more than 45% above the initial thresholds. See Table 1 for details.

Table 1. Monthly Income Thresholds for a Family of Three across the 50 States and the District of Columbia

State	Initial Income Eligibility Threshold (Dollars per Month)	Continuing Income Eligibility Threshold (Dollars per Month)	Percent Increase in Income Allowed
Alabama	2,007	2,316	15.4
Alaska	4,524	4,524	---
Arizona	2,626	2,626	---
Arkansas	2,480	2,480	---
California	3,518	3,518	---
Colorado[1]	2,625	2,625	---
Connecticut	3,569	5,354	50.0
Delaware	3,088	3,088	---
DC	3,815	4,258	11.6
Florida	2,386	3,182	33.3
Georgia	2,347	2,347	---
Hawaii	3,927	3,927	---
Idaho	2,069	2,069	---
Illinois	2,944	2,944	---
Indiana	2,020	2,704	33.9
Iowa	2,307	2,307	---
Kansas	2,943	2,943	---
Kentucky	2,317	2,549	10.0
Louisiana	2,545	2,545	---
Maine	3,860	3,860	---
Maryland	2,499	2,499	---
Massachusetts	3,508	5,964	70.0
Michigan	1,990	1,990	---
Minnesota	2,816	4,014	42.6
Mississippi	2,917	2,917	---
Missouri	1,960	2,145	9.4
Montana	2,289	2,289	---
Nebraska	1,854	1,854	---
Nevada	3,740	3,740	---
New Hampshire	3,978	3,978	---
New Jersey	3,088	3,860	25.0
New Mexico	3,182	3,182	---
New York	3,182	3,182	---
North Carolina	3,568	3,568	---
North Dakota	2,548	2,548	---
Ohio	1,931	3,090	60.0
Oklahoma	2,925	2,925	---
Oregon	2,944	2,944	---

State	Initial Income Eligibility Threshold (Dollars per Month)	Continuing Income Eligibility Threshold (Dollars per Month)	Percent Increase in Income Allowed
Pennsylvania	3,182	3,739	17.5
Rhode Island	2,864	2,864	---
South Carolina	2,386	2,784	16.7
South Dakota	2,784	2,784	---
Tennessee	2,641	2,641	---
Texas[2]	3,182	3,933	23.6
Utah	2,668	3,335	25.0
Vermont	3,050	3,050	---
Virginia[3]	2,823	2,823	---
Washington	3,182	3,182	---
West Virginia	2,386	2,943	23.3
Wisconsin	2,943	3,182	8.1
Wyoming	3,580	3,580	---

Source: CCDF Policies Database October 1, 2012 Data

Notes:

[1] Policies coded for Denver County. Counties may establish initial eligibility thresholds between 130 and 225% of the Federal Poverty Guidelines.

[2] Policies coded for the Gulf Coast Region. Local boards have the authority to establish eligibility thresholds as either a percent of the Federal Poverty Guidelines or state median income, but not to exceed 85% of state median income.

[3] Policies coded for areas in Group III. Across Virginia, eligibility thresholds range from 150 to 185% of the Federal Poverty Guidelines.

Job Search

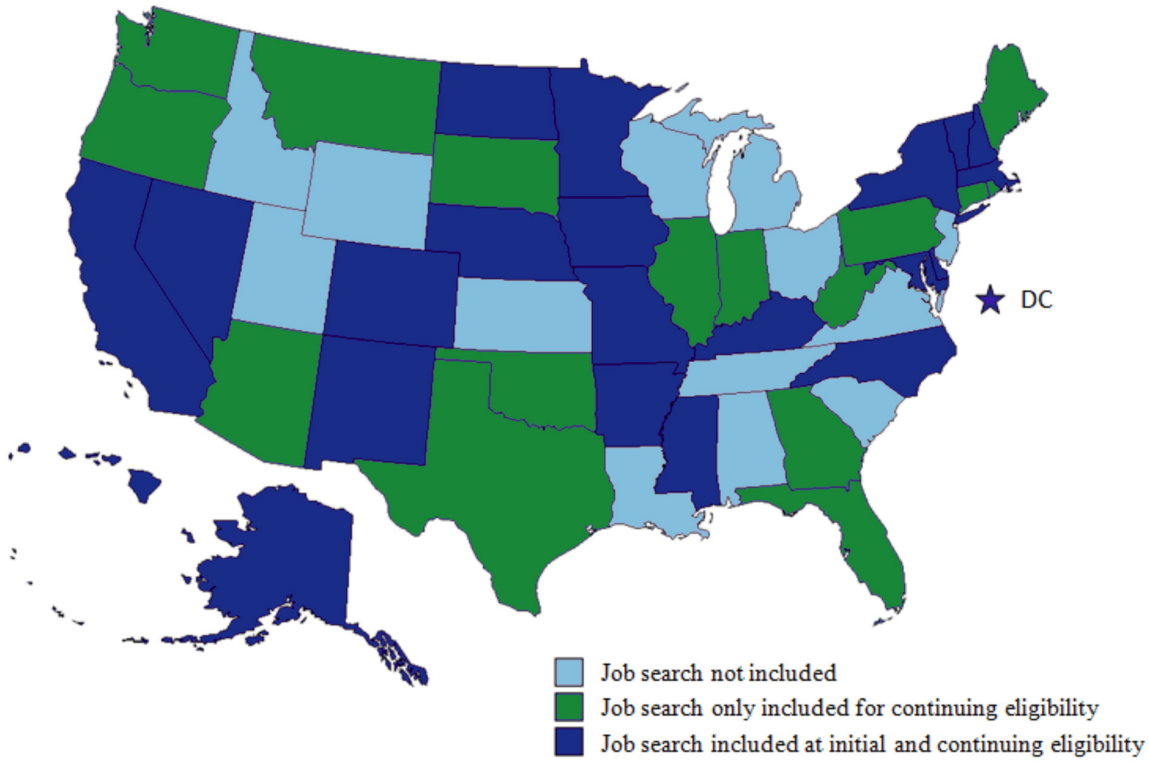
One eligibility criterion for CCDF subsidies is that the parent(s)/guardian(s) of the child receiving a subsidy be engaged in work-related activities, which include job training and education.[5] States define which activities, such as high school or post-secondary education, are included under these broad categories and may choose to include job search activities when defining work activities. Allowing for job search activities can prevent families from losing assistance if they experience job loss while participating in the subsidy program. The allowance of job search as a work-related activity is important to consider, as many low-income families have unstable employment patterns (Weber & Grobe, 2011; Wu, 2011). Research in two states (Oregon, Wisconsin) has found the majority of families leaving the subsidy program exit at the same time that they experience a job loss (Ha & Meyer, 2010; Weber & Grobe, 2011).[6] The inclusion of job search as a work-related activity may be particularly useful in facilitating continuity of subsidy receipt in states that have a waiting list for subsidy services, as families that lose subsidy benefits in those states may lose benefits for an extended period of time if they get placed on the wait list for a new subsidy.

[5] Families receiving protective services may not be required to meet work requirements. States choose how to define protective services, and may include such groups as foster care cases, families who are homeless, families where the parent is incapacitated (medically verified disability that prevents the parent from caring for the child), and families where the caretaker is elderly (usually a grandparent).

[6] It should be noted that in one of these states, job search is an allowable work activity for families receiving a subsidy.

As shown in Figure 3, 16 states only approve the provision of a subsidy for the purpose of job search for parents who become unemployed while already participating in the child care subsidy program. This is referred to as job search for continuing eligibility only. Twenty-one states and the District of Columbia also approve care for new entrants to the program that are unemployed and looking for work. This is referred to as job search for initial and continuing eligibility.

Figure 3. Inclusion of Job Search as Employment-Related Activity across the 50 States and the District of Columbia



States also vary on the maximum length of time unemployed parents are allowed to use child care subsidies, as well as the number of times subsidies can be approved for job search within a given time period. For example, Iowa allows 30 consecutive days of child care assistance for job search per year, while New York allows individual districts to approve up to six months of child care assistance per year for job search. Twenty-two states allow for two or more job search periods in a year. The District of Columbia has no time limitations on job search activities. See Table 2 for details.

Table 2. Job Search Time Limits

State	Job Search Time Limit
Alabama	N/A, job search not approved
Alaska	80 hours of care per calendar year
Arizona	30 days per job loss occurrence, with up to two 30-day periods in a year
Arkansas	60 days per calendar year, with 45 days initially approved plus a possible 15 day extension and a 60-month lifetime limit
California	60 days per fiscal year, limited to five days per week and less than 30 hours per week
Colorado	30 days per 12-month period

State	Job Search Time Limit
Connecticut	Approved through the end of the month following the month in which employment ended
Delaware	3 months per job loss occurrence
DC	No time limit
Florida	30 days per job loss occurrence
Georgia	8 weeks per job loss occurrence
Hawaii	30 consecutive days per 12-month period
Idaho	N/A, job search not approved
Illinois	30 days per job loss occurrence, with up to three 30-day grace periods in any 12-month period
Indiana	13 weeks per year
Iowa	30 consecutive days per 12-month period
Kansas	N/A, job search not approved
Kentucky	4 weeks per job loss occurrence
Louisiana	N/A, job search not approved
Maine	2 months per six-month period, limited to 20 hours per week
Maryland	2 weeks per job loss occurrence, multiple job search periods may be approved in a year
Massachusetts	12 weeks per year, with 8 weeks initially approved plus a possible 4 week extension
Michigan	N/A, job search not approved
Minnesota	240 hours per calendar year
Mississippi	60 days per job loss occurrence from the last day of employment
Missouri	30 days per job loss occurrence, with up to two 30-day periods per year
Montana	30 days per job loss occurrence, multiple job search periods may be approved in a year
Nebraska	2 consecutive calendar months per job loss occurrence in a program year
Nevada	2 weeks per calendar year
New Hampshire	40 days per six-month period
New Jersey	N/A, job search not approved
New Mexico	30 days per job loss occurrence, with up to two 30-day periods per year
New York	6 months per year if a district selects this option
North Carolina	60 days per job loss occurrence, with 30 days initially approved plus a possible 30 day extension
North Dakota	8 weeks per calendar year, limited to 20 hours per week
Ohio	N/A, job search not approved
Oklahoma	30 days per job loss occurrence, with up to two 30-day periods per year
Oregon	1 month per job loss occurrence
Pennsylvania	60 days per job loss occurrence, with 30 days from the date employment ended plus a possible 30 day extension
Rhode Island	21 days per six-month period
South Carolina	N/A, job search not approved
South Dakota	30 days per six-month period

State	Job Search Time Limit
Tennessee	N/A, job search not approved
Texas	4 weeks per fiscal year
Utah	N/A, job search not approved
Vermont	4 weeks per year, extensions may be authorized
Virginia	N/A, job search not approved
Washington	28 days per occurrence, with up to two 28-day periods per year
West Virginia	30 days per six-month period, limited to five hours per day and four days per week
Wisconsin	N/A, job search not approved
Wyoming	N/A, job search not approved

Source: CCDF Policies Database October 1, 2012 Data

Conclusion

In conclusion, states vary on multiple policies that may affect continuity of care, including how long families are issued a subsidy before completing eligibility redetermination, differences in income eligibility thresholds at initial application versus redetermination, and what allowances states make for job search activities at initial application and redetermination. The policies reviewed in this brief represent potential intervention points for state administrators to facilitate continuity in subsidized care arrangements. A review of how states are implementing the reviewed policies may be used to contextualize research findings from state-specific or cross-state studies and to inform conversations about facilitating continuity in subsidized care among state administrators. The data presented in this brief were compiled through the Child Care and Development Fund Policies Database. For more resources, including state and territory data tables, developed from this database, see http://www.acf.hhs.gov/programs/opre/research/project/child-care-and-development-fund-ccdf-policies-database-2008-2013.

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