## Aggregated Questions & Comments With Responses 7 AAC 41 Proposed Regulation Changes Received by COB June 5, 2017

## **Question:**

What are the new rates going to be? Enrollment authorization is proposed to be changed to allow for a child in a shared custody arrangement to be authorized for up to a maximum of a full month enrollment for each parent based on service delivery area. Does this mean that if two providers have the same child because the parents take them to two separate providers half the time, now do those providers split the full time rate instead of each getting the part time rate?

## Response:

Thank you for your interest in the proposed revisions to 7 AAC 41 Child Care Assistance Program. The new proposed Child Care Assistance Rates are provided on the proposed Child Care Assistance Program Rate Schedule. No, the providers will not have to split a full month enrollment authorization. A child in shared custody arrangement can be authorized for up to a maximum of a full month enrollment for each parent when the providers used are in different CCAP service delivery areas. In this case the child will be authorized two full month enrollments, one full month enrollment per provider.

## **Question:**

Are the correct rates listed for Southeast Alaska?

#### Response:

Thank you for your interest in the proposed revisions to 7 AAC 41 Child Care Assistance Program. The rate listed for Southeast Alaska on the proposed Child Care Assistance Rate Schedule is correct.

#### **Question:**

I read the proposed changes and am wondering what those changes in dollar amounts will be. I am very close to the Maximum for a family of 5 on a single income and am concerned if I will still be eligible.

#### Response:

Thank you for your interest in the proposed revisions to 7 AAC 41 Child Care Assistance Program. The change in copay will vary depending on the family size and countable income. You can find the proposed new income limits and co-pay amounts on the proposed Family Income and Contribution Schedule.

### Question:

Is it correct on the schedule that they are proposing to change infant to only up to 12 months of age? When looking at part month enrollment it means fewer than 17 days of care in any combination of part and full days. Does that mean if a child has 15 full days and one part day in a month then the contract will be written for part time enrollment?

## Response:

Thank you for your interest in the proposed revisions to 7 AAC 41 Child Care Assistance Program. Under the current Child Care Assistance Program Regulations adopted effective 1/5/17, 7 AAC 41.025(b)(1)(a), the age group for infant is birth through 12 months of age. The age categories on the Child Care Assistance Rate Schedule are being implemented with the proposed rate changes. Under the current Child Care Assistance Program Regulations adopted effective 1/5/17 to be implemented with the adoption of this proposed change care will be authorized as a full or part month. Yes, if the child's units of care is determined to be 15 full days and 1 part day that is a part month enrollment. In this example the part month covers the 15 full days and 1 part day. Payment to the provider for this scenario would be part month payment.

## **General Question:**

Location of where the proposed regulations can be found?

## Response:

Thank you for your interest in the proposed revisions to 7 AAC 41 Child Care Assistance Program. To view the Notice of Proposed Changes and attachments please visit <a href="https://aws.state.ak.us/OnlinePublicNotices/Notices/View.aspx?id=185465">https://aws.state.ak.us/OnlinePublicNotices/Notices/View.aspx?id=185465</a>.

#### **Comment:**

If these new guidelines are adopted it would mean that more families will have access to higher quality programs. Currently many families opt out of a higher quality program because the tuition difference between the max state rate and the child care tuition is more than they can pay. Raising the rate and changing the income schedule will benefit these families.

#### Response:

Thank you for your interest in the proposed revisions to 7 AAC 41 Child Care Assistance Program. This is to confirm that your comments and questions have been received. The questions must be received at least 10 days before the end of the public comment period. The Department of Health & Social Services will aggregate its response to substantially similar questions and make the questions and responses available on the Alaska Online Public Notice System at <a href="https://aws.state.ak.us/OnlinePublicNotices/">https://aws.state.ak.us/OnlinePublicNotices/</a> and its website at <a href="http://dhss.alaska.gov/dpa/Pages/ccare/default.aspx">http://dhss.alaska.gov/dpa/Pages/ccare/default.aspx</a>. The CCPO will edit out the names and personal information of the commenter. This allows all interested parties to view all comments and questions. Reminder, the public comment period ends 5 pm on June 5, 2017.

#### **Comment:**

As a married parent of two children, I am in need of these proposed changes to the child care assistance program. I exceed the current income cutoff by \$16.00 so can only place my youngest child in the child development center and pay full price out of pocket, which causes additional worry about how to pay bills and put food on the table. My older child is bounced between family and a babysitter and I worry about this child's well-being and developmental growth. I need these changes to provide my children with the best early childhood education that is possible.

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### **Comment:**

As a Center Director in Juneau, AK I think all rates need to be adjusted to reflect the current cost of living and the current Center Rates. The example, our preschool families receive approximately 675 per month, Tuition is 910 per month. Full Day tuition is 1120 making the gap even larger. In consideration, please adjust all rates to reflect current economic times.

#### Response:

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#### Comment:

The current full time care rate for preschool age children in our licensed center for the school year 2017-2018 is \$1,030. A reasonable child care assistance rate for our families would be \$200 more than the currently proposed rate which have not changed to reflect increases in the cost of living. They are far from being the kind of support low income families need to provide quality care for their young children. My calculation of the proposed rate is about 63% of the real costs of care. Consequently, quality programs are less accessible to low-income families. Quality preschool education and child care are investments the State of Alaska cannot fail to make. The research demonstrates that investing in families with young children saves millions of dollars in future services including the criminal justice system, and provides a great return when investing in workforce development. Please reconsider how these rates are calculated and ensure that low-income families receive adequate financial assistance they need to support the development of their young children.

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#### **Comment:**

Market rates for the Fairbanks area seem too low given the increases in costs. After this last update paid rates have not increased at all while cost of care has increased. It costs up to 3 times more to care for an infant compared to a preschooler so we do not agree with the lower rate. Some children at 5 years old will be in preschool for another entire year. Changing this category will significantly hurt parents and providers alike when a 5 year old has care provided to them until or after they turn 6. Part time enrollment rates compared to full time month enrollment rates are set too low. A 2 parent household is significantly hurt by the new wage eligibility standards which decrease subsidy rates as income increases much more quickly than the current standard.

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#### **Comments:**

I am very concerned about the proposed Child Care Assistance Changes. Mat Su Valley has not received a increase to their appropriations since 2008. This has caused a severe hardship on many families served. The rates at our facility have gone up 5% and will have to raise another 5-7% just to maintain the quality staff on site. Many centers are no longer providing care for infants or young toddlers due to no profit margin. The proposed change in some of the billing will also be detrimental. At this time higher rates will increase what parents and foster parents will have to pay in order for the child to attend here. Many sites only take full time care children and all parents have to pay it whether the child is in attendance or not. I urge you to have child care assistance rates raised in the Mat-Su Valley for the new rate schedule and continue the age groups as they are now.

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## **General Comment:**

As a childcare facility in the Matanuska-Susitna Valley, we wish to express opposition to several of the proposed changes to the Child Care Assistance Program. These concerns are primarily with the proposed rate schedule, as well as the proposed age groups and part-time contracts. According to the proposed rate schedule, the state rates are not being raised for licensed childcare centers in the Mat-Su Valley. Over the last few years, a drastic increase in wages has created a dilemma for local centers. It has become increasingly difficult to provide a quality standard of care and staff without increased rates to counterbalance the increase in wages. When the rates remain the same as the wages increase, childcare facilities are forced to choose between keeping quality staff and providing top-notch materials and educational items. To alleviate this financial burden, almost all of the local centers in our area have raised their rates. However, this hardship is merely being transferred to our parents, who are now required to pay above and beyond

the copays that the Child Care Assistance office has deemed affordable. By raising the Child Care Assistance rates, the burden on childcare centers in the Mat-Su Valley, as well as the parents who utilize their services, can be drastically reduced. According to the new rate schedule, an infant is considered a toddler at 12 months of age. This differs from the current age of 19 months, which follows the ratio guidelines of Childcare State Licensing. Due to the aforementioned staffing expenses, the majority of Childcare centers will most likely keep their rates in line with State Licensing. As a result, parents on Childcare Assistance with children aged 13-19 months old will be required to pay even more beyond their co-pay. The Child Care Assistance age groups should continue to fall in line with licensing age groups. The proposed rate sheet also alludes to the fact that a part time contract will be issued for any child attending less than 17 days, even if the child attends 15 full-time days and 1 part time day. If this is the case we will be providing full time care for most of the month and only receiving part time compensation which again would put childcare facilities in a financial bind, forcing us to lower our standard of care, or forwarding the cost onto the parents. In conclusion, we urge Child Care Assistance to raise their rates in the Mat-Su Valley for the new rate schedule and continue to keep the age groups in line with State Licensing. We also implore a closer look at how contracts are going to be issued to ensure that local centers are being paid appropriately for the care being provided.

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