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INFORMATION MEMORANDUM

TO: Early Head Start - Child Care Partnership Grantees and Partners

SUBJECT: Policy and Program Guidance for the Early Head Start-Child Care Partnerships (EHS-CCP)

INFORMATION:

This Information Memorandum (IM) reinforces the purpose and vision of the Early Head Start – Child Care Partnerships (EHS-CCP) and provides policy and program guidance for grantees and their partners.¹ This IM specifically addresses various issues and questions raised by grantees during the EHS-CCP orientations and start-up phase of the grants.

The EHS-CCP program will enhance and support early learning settings to provide full-day/full-year, seamless, and comprehensive services that meet the needs of low-income working families and those in school; increase access to high-quality, full-day child care (including family child care); support the development of infants and toddlers through strong relationship-based experiences; and prepare them for the transition into Head Start and preschool. The EHS-CCP is a unique opportunity which brings together the best of Early Head Start and child care through layering of funding to provide comprehensive and continuous services to low-income infants, toddlers, and their families. The EHS-CCP grants will serve as a learning laboratory for the future of high-quality infant/toddler care.

All infants and toddlers attending an EHS-CCP site will benefit from facilities and homes that are licensed and meet safety requirements. All children in classrooms with EHS-CCP-enrolled children will benefit from low teacher-to-child ratios and class sizes, qualified teachers receiving ongoing supervision and coaching to support implementation of curriculum and responsive caregiving, and broad-scale parent engagement activities. While only enrolled EHS-CCP children will be eligible for direct family-specific benefits such as home visits, health tracking and follow-up, and individualized family support services, EHS-CCP programs must operationalize services to ensure there is no segregation or stigmatization of EHS-CCP children due to the additional requirements or services.

The long-term outcomes of the program are:

1. Sustained, mutually respectful, and collaborative EHS-CCP
2. A more highly educated and fully qualified workforce to provide high-quality infant/toddler care and education
3. Increased community supply of high-quality early learning environments and infant/toddler care and education
4. Well-aligned early childhood policies, regulations, resources, and quality improvement support at national, state, and local levels

¹ Throughout this document, the use of the term “child care” or “partner” refers to partnering licensed child care centers and licensed family child care providers.

5. Improved family and child well-being and progress toward school readiness

The EHS-CCP brings together the strengths of child care and Early Head Start programs. Child care centers and family child care providers respond to the needs of working families by offering flexible and convenient full-day and full-year services. In addition, child care providers have experience providing care that is strongly grounded in the cultural, linguistic, and social needs of the families and their local communities. However, many child care centers and family child care providers lack the resources to provide the comprehensive services needed to support better outcomes for the nation's most vulnerable children. Early Head Start is a research-based program that emphasizes the importance of responsive and caring relationships to support the optimal development of infants and toddlers. Early Head Start provides comprehensive family centered services that adhere to the Head Start Program Performance Standards (HSPPS)² to support high-quality learning environments. Integrating Early Head Start comprehensive services and resources into the array of traditional child care and family child care settings creates new opportunities to improve outcomes for infants, toddlers, and their families.

Attachment A provides topical policy and program guidance around:

- Seamless and Comprehensive Full-Day/Full-Year Services
- Partnership Agreements
- Layered Funding
- Child Care Subsidies
- Citizenship and Immigration Status
- Child Care Center Ratios and Group Sizes
- Staffing and Planning Shifts for Staff
- Staff Qualifications and Credential Requirements
- Federal Oversight and Monitoring

Please share this IM with your partners and direct any questions to your Administration for Children and Families (ACF) Regional Office.

Thank you for your efforts on behalf of infants and toddlers and their families.

/ Linda K. Smith /
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/ Blanca Enriquez /
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/ Rachel Schumacher /
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² See: <https://eclkc.ohs.acf.hhs.gov/hslc/standards/hspss>

Attachment A

Seamless and Comprehensive Full-Day, Full-Year Services

Early Head Start – Child Care Partnership (EHS-CCP) funds will be used to support a full-day and full-year of high-quality child care services meeting Early Head Start Program Performance Standards and providing comprehensive support for enrolled infants and toddlers and their families. A full-day means that services must accommodate the needs of full-time working families, which generally means availability of services for a 10-hour day. Programs must operate for the full-year that child care programs are typically open. The full-year is inclusive of time needed for staff professional development activities.

In what is often referred to as "wrap-around services," EHS funds have historically been used to provide a minimum of six hours of comprehensive EHS-compliant care (i.e., meets Head Start Program Performance Standards (HSPPS) requirements), and programs may provide care or partner with child care agencies to provide such care before and/or after the EHS-compliant hours. The service model for the EHS-CCP grant is **different** from "wrap-around services" and was intentionally designed to enhance the quality of child care for infants and toddlers by integrating the additional resources and services that meet HSPPS for a seamless full-day and full-year of comprehensive services. Infants and toddlers will be placed in high-quality care with qualified teachers for the entire time they are enrolled in the EHS-CCP program. Other children who are also enrolled in classrooms with EHS-CCP children will benefit from the enhanced services and support that will be made available to the child care partners through this grant.

Please see the section on Layered Funding for more information on how grantees and their partners can use the EHS-CCP grant and other funding to pay for these seamless and comprehensive services.

Partnership Agreements

A key provision of this grant is the partner relationship between the EHS grantee and its child care partners. EHS-CCP grantees partner with child care programs to provide resources and support the delivery of comprehensive services, including enhanced quality learning environments that benefit other children and families sharing the child care setting. To accomplish this, grantees must work closely with their child care partners to develop and enter into written partnership agreements which detail the programmatic and fiscal relationship between the grantee and each child care partner. Mutually beneficial partnership agreements are a critical component of the EHS-CCP. Grantees and partners should engage in early and ongoing conversations, ensuring that roles and responsibilities are clearly specified and updates and amendments are made when needed.

Grantees must determine whether their partnership agreement creates the relationship of a sub-recipient or contractor. Grantees should consult the regulations found at 45 CFR Part 75 (the Uniform Guidance) to understand the terms "sub-recipient" and "contractor," their fiscal implications, procurement standards that apply to contractor relationships, and standards for monitoring and managing sub-recipient relationships.³ A **sub-recipient** is a non-federal entity that receives a sub-award from a pass-through entity to carry out part of a federal program; but does not include an individual that is a beneficiary of such program. A sub-recipient also may be a recipient of other federal awards directly from a federal awarding agency. A **contractor** is an entity that receives a contract to provide property or services needed to carry out the project or program under a federal award. The grantee will need to determine the type of fiscal relationship with its partners that will be necessary and appropriate based on the anticipated roles and responsibilities of the grantee and

³ For grantees entering into contractor relationships, procurement standards in the Uniform Guidance in §75.326 – §75.335 apply. For grantees with sub-recipients, the management of monitoring standards in §75.351 – §75.353 apply.

partner in the delivery of EHS-CCP services and the organizational capacity of individual child care partners.

A carefully thought-out partnership agreement is critical for the grantee and partner to work effectively to deliver high-quality services. Individual partners, whether child care centers or family child care homes, may be in very different stages of readiness to meet the service and environmental requirements of the EHS-CCP. Grantees need to plan and discuss partnership agreement terms with each partner, including an assessment of partner needs related to facilities, referral and enrollment protocols, classroom environment, ratios, group size, staff qualifications, staffing plans, curriculum, meals, and other supports. At a minimum, the agreement should identify the parties involved, list the term or length of the agreement, address the recordkeeping and reporting requirements of both parties, describe in detail the performance required of each party, and state how performance concerns will be addressed, up to and including termination of the agreement. The agreements must be individualized to address the unique needs of each partner, and the grantee should carefully assess the cost of meeting partner expectations for each partnership agreement to ensure that sufficient funds are being paid to the partner to accomplish needed improvements and staff support. The agreement should specify who will be accountable for ensuring standards and service levels required by the grant, and the grantee's role and responsibilities for providing support and oversight to their partners.

The subsidy status of enrolled children is an important consideration in establishing the grantee's operating budget and calculating the amount to be paid for partnership services. Grantees must assure that available subsidy funds are not supplanted (replaced) by EHS-CCP funds. The agreement and program budgets must anticipate the loss of subsidy or other funding; recognizing that loss of funding is not a basis for dis-enrolling an EHS-CCP child already enrolled in the program. See next section on Child Care Subsidies for more information.

While some basic terms of a partnership agreement may remain consistent, a "one size fits all" approach to partnerships is not possible and each partnership agreement should be tailored to reflect partner needs. Partnership agreements are working documents and will likely need to be revisited over the life of the grant.

Payment in Advance for Partners

Payment terms and conditions are an important aspect of the partnership agreement. Grantees are expected to direct a significant portion of funding to their child care partners. Many child care partners do not have sufficient resources to advance the cost of providing partnership services and will need access to sufficient funds to accomplish the goals and objectives established in the agreement. Partners should be paid on an enrollment basis rather than on an attendance basis. The EHS-CCP grantee is funded on an enrollment basis by the federal government, and this method needs to be adopted with most partners. The partner will have other costs associated with fully preparing their staff and the care environment to meet HSPPS that also must be calculated into payments made under the agreement.

The historic or actual child care subsidy status of enrolled families must be taken into account in determining the amount paid to partners to assure that existing child care funds are not supplanted. Subject to receipt of adequate documentation of anticipated costs, grantees may structure their partnership agreements to pay in advance on a monthly basis for identified partner costs. Anticipated costs must be reconciled with actual costs on a monthly basis to assure that EHS-CCP funds are used only for allowable program-related services. Should payment overages occur, these amounts can be reconciled in the next month's advance payment.

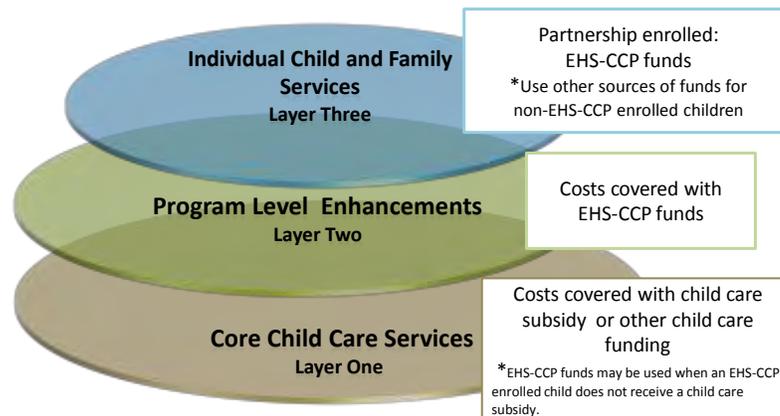
Layered Funding

The EHS-CCP program represents a unique opportunity to leverage and maximize resources utilizing multiple funding sources to enhance the early care and education capacity of child care partners and improve outcomes for infants and toddlers far beyond the scope of those enrolled in the program. Grantees will utilize EHS-CCP funds to partner with local child care centers and family child care homes. Partnership funds will enhance existing budgets that include the Child Care and Development

Fund (CCDF) and/or other existing child care funding. CCDF funds may be used in collaborative efforts with Head Start programs to provide comprehensive child care and development services for children who are eligible for both programs. In fact, the coordination and collaboration between Head Start and the CCDF is strongly encouraged by sections 640(g)(1)(D) and (E), 640(h), 641(d)(2)(H)(v), and 642(e)(3) of the Head Start Act in the provision of full working day, full calendar year comprehensive services. In order to implement such collaborative programs, which share, for example, space, equipment, or materials, grantees may layer several funding streams so that seamless services are provided.⁴

EHS-CCP grantees will build upon the foundation of existing child care funding (Layer 1) with two additional layers. Layer 2 will provide program-level quality enhancements and Layer 3 will provide individual child and family services for EHS-enrolled children only. Layer 2 funds provide the resources to support benefits for all children sharing a classroom or care environment with children and families enrolled in EHS-CCP. Grantees are required to ensure that at least 25 percent of the EHS-CCP-enrolled children are receiving child care subsidies at the time of their enrollment (see next section on Child Care Subsidies for more information). It is important to note that some grantees may have a higher percentage requirement for children receiving subsidy based on the grantee's approved application. The enrollment of more than minimum numbers of subsidized children provide an important source of Layer 1 funds to support the delivery of comprehensive services to children and families.

Layering Services and Costs



Long Description: *The title of the figure is "Layering Services and Costs." There are three circular shapes sitting on top of each other. The bottom circle is entitled, "Layer One: Core Child Care Services." There is a text box to the right of the circle that says, "Costs covered with child care subsidy or other child care funding. EHS-CCP funds may also be used for these costs when an EHS-CCP enrolled child does not receive a child care subsidy." The middle circle is entitled, "Layer Two: Program Level Enhancements." There is a text box to the right of this circle that says, "Costs covered with EHS-CCP funds." The top circle is entitled, "Layer Three: Individual Child and Family Services." There is a text box to the right of the circle that says, "Partnership enrolled: EHS-CCP Funds. Use other sources of funds for non-EHS-CCP enrolled children."*

⁴ OMB Circular A-133 Compliance Supplement 2014, see Department of Health and Human Services, CFDA 93.575: Child Care and Development Block Grant, at: https://www.whitehouse.gov/omb/circulars/a133_compliance_supplement_2014

- **Layer 1:** The first, or foundational layer, is made up of the core child care services that already exist in partner programs. This represents the costs of services that are covered by the child care subsidy/voucher (including any required parent co-pays) or any other revenue streams that are supporting core child care services. If an EHS-CCP-enrolled child loses the child care subsidy, EHS-CCP funds can cover the temporary loss to ensure continuity of services for the child. (See next section on Child Care Subsidies for more information, including the sub-section on Parent Co-Pays). EHS-CCP funds may also be used for these costs when an enrolled child does not receive a subsidy.
- **Layer 2:** The second level of funding is made up of program-level service and environmental enhancements that are needed to meet EHS requirements. This represents costs in a classroom in which enrolled children are served that may include: standard developmental screenings for all children in a classroom; an enhanced curriculum; classroom supplies, materials, and equipment; training and education for teachers and other providers; enhanced pay for teachers who meet EHS education requirements; increased staffing to meet EHS-required staff-child ratio and group size requirements; and minor facility renovations or equipment needed to meet EHS standards.⁵ These enhancements, paid by EHS-CCP funding, must directly benefit EHS-CCP-enrolled children, but are also expected to benefit other children sharing a classroom or service environment with enrolled children. This is an important feature of the program.
- **Layer 3:** The third layer is made up of services provided to individual EHS-CCP-enrolled children and their families, such as salaries and fringe benefits for family support workers supporting EHS families, external referrals to health and mental health providers, home visits, and other family support services. It is important to note that EHS-CCP funds **cannot** be used to provide Layer 3 individual services for children and families not enrolled in the EHS-CCP. Other sources of funding (e.g., foundation or other state and local funding) can be used to provide similar services to non-enrolled children and families.

Finally, EHS-CCP funds must supplement, not supplant, existing child care funds. Grantees must ensure that they have adequate source documentation to identify costs within the three layers of funding that complies with the requirements of the Uniform Guidance (45 CFR Part 75) for federal grants. The concept of layering funds is used to assure that EHS-CCP funds will enhance service quality without duplication or replacement of existing child care funding.

Child Care Subsidies

Child care subsidy is an essential foundation of Layer 1 funding, which supports the EHS-CCP program and includes third-party subsidies funded by the CCDF or another source (e.g., Temporary Assistance to Needy Families (TANF), Social Services Block Grant, or state or local funding). Therefore, children receiving subsidies from a variety of sources could count toward the 25 percent requirement. It is important to note that partners may not be aware of the federal funding source because states can choose to pool some funding sources and most have a state-specific name for the child care subsidy program.

Based on the requirements of the funding, EHS-CCP grantees must recruit and enroll, at a minimum:

- Twenty-five percent of funded enrollment with child care subsidies; or
- The percentage of children with child care subsidies proposed in their approved grant application (which may be more than 25 percent)

The determination about whether an EHS-CCP grantee meets this requirement should be made at least annually based on each child's status at the time of enrollment into EHS-CCP. The percentage of children with subsidies may fluctuate over the course of the grant project as families obtain or lose the subsidy after the initial enrollment, or children leave the program. An added benefit of the EHS-CCP program are the comprehensive services, including family support workers, that are available to help

⁵ Minor facility renovations are defined in the HSPPS at 45 CFR 1309.3 and cannot exceed \$250,000.

families navigate the subsidy application and re-application process (see next section on Loss of Subsidy and Ensuring Continuity of Services).

It is important to note that states have significant latitude to set subsidy policies and to determine how closely tied the hours of subsidy approval match parental work status and hours. However, the federal authorizing law for CCDF – the Child Care and Development Block Grant (CCDBG) Act – was revised by Congress in 2014, including sweeping changes to subsidy rules. One such change states that each child "will be considered to meet all eligibility requirements for such [child care] assistance and shall receive assistance, for not less than 12 months before the state or designated local entity re-determines the eligibility of the child." The Office of Child Care (OCC) has said that state grantees have until September 2016 to come into compliance with this provision of the law (see [Program Instruction on CCDF Reauthorization Effective Dates, CCDF-ACF-PI-2015-02](#)). OCC has long encouraged state policies that promote continuity of services, and has indicated that states may establish longer eligibility periods for children in Head Start and Early Head Start (see [Policy Interpretation Question on Eligibility Determination for Head Start Collaboration, ACYF-PIQ-CC-99-02](#)). OCC is in the process of developing a proposed rule in connection with the new law; therefore, state policies may be in flux.

EHS-CCP grantees should closely monitor whether they are meeting the 25 percent minimum subsidy receipt requirement. Grantees may establish a selection criterion that includes a preference for EHS-eligible children with child care subsidies as necessary to meet minimum enrollment requirements for children with subsidies. It may be necessary for grantees and partners to enroll more than their minimum required percentage of children with subsidies to meet the revenue levels they may have assumed in their budget to support the provision of comprehensive services to all enrolled EHS-CCP children and their families.

Grantees must ensure that their partners have a system that can track the number of enrolled children with subsidies to determine the amount of child care subsidy and related revenue that partners receive. Recordkeeping and reporting between the grantee and partner should be outlined in the partnership agreement. The EHS-CCP grantee will work with their partners to maintain the 25 percent enrollment with child care subsidies (or as specified in the approved grantee application). Grantees experiencing challenges in enrolling sufficient numbers of children with subsidies should work with their Regional Office, state and local subsidy agencies, and community partners to address barriers.

Loss of Subsidy and Ensuring Continuity of Services

EHS-CCP grantees must be committed to promoting continuity of services and relationships for children and families. Grantees and their partners must work with parents to ensure that EHS-CCP families have the support needed to help them initially acquire and maintain child care subsidies for eligible children. Disruptions in the services and relationships, which sustain and support children and families, must be prevented as much as possible. Programs may **not** dis-enroll otherwise eligible children from EHS-CCP because they lose their child care subsidy. Grantees must ensure that children whose families experience job loss or loss of child care subsidies will continue to be served. The grantee must include a requirement in their partnership agreements that the continuity of services and relationships must be preserved and a child should remain in the current care setting and classroom regardless of loss of subsidy.⁶ Should a family lose subsidy, EHS-CCP children remain enrolled in the same classroom or setting and EHS-CCP grant funds will be used to cover the **temporary** cost of lost subsidy and the continuation of services.

The EHS-CCP program should continue to work with the family to maintain the relationship with their primary teacher and continuity of services for the child. The EHS-CCP grantee and partner both can play a role in this work. Depending on the roles and responsibilities outlined in the partnership agreement, EHS-CCP works with the family toward improving the circumstances that caused the loss

⁶ There may be some situations where the change that prompts loss of subsidy also makes another environment more appropriate for the child. The provider will need to work with the family to preserve the care and relationship that best supports the needs of the child and family.

(e.g., helping them find a job or re-enroll in education or training; helping them navigate the subsidy application process) and toward regaining subsidy, whenever possible. The partners use their expertise and knowledge of child care subsidy and the grantee utilizes comprehensive services and family support workers to help alleviate the situation. The EHS-CCP program also should set expectations for the parent to continue their efforts to regain subsidy once their individual circumstances have improved. EHS-CCP should tailor services to meet individual needs at that time. Family support workers should work closely with EHS-CCP families to anticipate potential changes to subsidy, such as loss of work, gap in schooling, assisting with annual redetermination, and so forth. The newly-revised CCDBG Act contains a number of provisions designed to promote continuity of subsidy receipt—including a requirement that a state provide at least three months of continued CCDF assistance if the state chooses to terminate assistance prior to the end of the minimum 12-month eligibility period due to a parent's job loss.⁷ Family support workers can be used as a resource to help families navigate the subsidy application process as part of the comprehensive services available through the EHS-CCP program.

It may not be possible in all circumstances to restore subsidy because the family may not be able to get back into employment quickly and there may be subsidy waiting lists at the state or county. In these cases, the EHS-CCP grant will need to assume the full cost of maintaining the child's continued participation in the program.

Parent Co-Pays and Other Parent Fees

CCDF requires states/territories to establish a sliding fee scale that provides for cost sharing (co-payment) that is not a barrier to families receiving child care assistance. A co-pay refers to an amount that a parent must pay toward the portion of their child care subsidy. These costs can range from approximately zero to 15 percent of the cost of the subsidy for a family of three at 100 percent of poverty with one child in care.⁸ State CCDF Lead Agencies may choose to waive the co-payment for families whose income is below the federal poverty level or for specified populations with income below poverty (e.g., TANF recipients, Head Start recipients, foster children). According to fiscal year (FY) 2014-2015 CCDF Plans, 15 states and territories waive co-pays for all families receiving CCDF who are below the federal poverty level.

Many states and territories have low subsidy payment rates that do not cover the cost of providing care. This can be a detriment to some providers' participation in the subsidy program; so some CCDF Lead Agencies have policies that allow providers to charge parents the difference between the provider's private pay rate and the subsidy maximum payment rate. Some states also allow providers to charge additional fees to parents for other costs. Some states do not pay the provider for days the child is absent and the provider can charge the parent for those days not paid by the state. Other parent fees include registration fees, activity fees, and late fees.

EHS-CCP programs must examine the impact of these state and local subsidy and parent fee policies as part of the process of developing their partner agreements and their corresponding budgets. EHS-CCP grantees and their partners may only charge co-payments in those circumstances where the state has not agreed to waive parent co-pays. Some partner agencies may have another revenue source that can cover families who cannot pay the co-pay. The majority of partner agencies, however, have business models that depend on receiving the co-pay from each family. On a case-by-case basis, EHS-CCP funds may be used to pay the cost of the parent co-payment only after it is determined that the parent is financially unable to make the required payment and all other potential funding sources have been explored. As mentioned previously, the EHS-CCP program should also set expectations for the parent to eventually resume the responsibility for required payments once their individual circumstances have improved.

⁷ For more information about the reauthorization of the Child Care and Development Block Grant, visit: <http://www.acf.hhs.gov/programs/occ/ccdf-reauthorization>

⁸ National Women's Law Center, *Turning the Corner: State Child Care Assistance Policies, 2014 report*, see: <http://www.nwlc.org/resource/turning-corner-state-child-care-assistance-policies-2014>

It is important to note that the parents of a child who **lose** their child care subsidy during the course of program eligibility **cannot** be required to pay a parent fee for continued EHS-CCP participation. Such a fee is an unallowable charge for participation in the EHS-CCP program because Head Start regulations preclude the charging of fees to parents for Head Start services. Thus, parent fees for registration or other program-related activities (e.g., field trips and special events) are not allowable in the EHS-CCP. Since the EHS-CCP grant funds provide additional resources to child care partners, the cost of the differential between the provider's private pay rate and the subsidy amount should already be factored into the partner agreements.

However, if a program incurs expenses to compensate employees for the caring of a child after the EHS-CCP program day has ended, parents may be charged a reasonable late fee. In all cases, late fees should be collected by the program and not the employee who is providing the services.

Innovations in Subsidy Policies for EHS-CCP

Some states have implemented (or are considering) policies or pilot projects that will facilitate EHS-CCP, including aligning eligibility periods and waiving parent co-pays and other fees for EHS-CCP-enrolled children living in families below the poverty level. Existing CCDF regulations (45 CFR 98.42(c)) allow states to waive co-pays for families below poverty. Federal CCDF policy guidance also allows states to establish longer eligibility periods for children in Head Start and Early Head Start (see [Policy Interpretation Question on Eligibility Determination for Head Start Collaboration, ACYF-PIO-CC-99-02](#)). Grantees are encouraged to work with their Head Start Collaboration Office and the other EHS-CCP grantees in their state to collaborate with their CCDF administrator and other state partners to explore the possibility of more flexible policies for EHS-CCP. Grantees also should work with their Regional Office and state partners to explore other strategies that promote the continuity of care for the child and family and prevent the initial loss of subsidy for EHS-CCP enrolled children.

The reauthorization of CCDF presents new opportunities for state policies that will promote stability and continuity of services for the EHS-CCP program over the long-term. The Office of Head Start (OHS) and OCC are working closely to share best practices and plan for technical assistance to enhance EHS-CCP grantees' capacity to navigate the child care subsidy rules and regulations and support high-quality implementation.

Citizenship and Immigration Status

Federal law requires certain programs, including CCDF, to verify the citizenship and immigration status of beneficiaries of program services. For CCDF eligibility, only the citizenship and immigration status of the child is relevant. Verification is not required for Head Start and Early Head Start programs. Regarding partnerships between CCDF and Head Start and Early Head Start, including the EHS-CCP program, federal policy indicates that **citizenship and immigration status verification requirements do not apply to child care services that are subject to HSPPS and supported by combined Head Start and Early Head Start and CCDF funding** (ACYF-PI-CC-98-08, CCDF-ACF-PI-2008-01). In instances where services are funded in whole or in part by CCDF as part of a partnership with Head Start and Early Head Start programs, verification of citizenship or immigration status of children is not required, as long as the services meet HSPPS. Thus, verification of citizenship or immigration status is not required for enrolled EHS-CCP children. CCDF administrators may or may not be aware of these areas of flexibility, or may not have experience with partnerships across EHS and child care prior to the innovative EHS-CCP program. EHS-CCP grantees should work with CCDF administrators and stakeholders to find solutions necessary to revise current policies that require verification of citizenship or immigration policies for enrolled EHS-CCP children.

Child Care Center Ratios and Group Sizes

All grantees are required to meet the EHS standards for staffing ratios and group sizes, regardless of state licensing ratios (unless the state ratios are more stringent).⁹ Early Head Start ratios for center-based programs require one teacher for a maximum of four infants and toddlers and group or classroom sizes of no more than eight children. EHS-CCP grantees are strongly encouraged to provide

⁹ For example, the teacher to child ratio for infants and toddlers in Maryland is one to three.

direct benefits to non-EHS-CCP-enrolled children through mixed-enrollment classes to the extent feasible and sustainable with the existing resources. The intent of the EHS-CCP is to spread the positive benefits of the partnerships across multiple classrooms. As such, several EHS-CCP-enrolled children may be part of a class of eight child care center-enrolled children with two teachers. The Administration for Children and Families (ACF) acknowledges that sustainable funding may rely on sufficient numbers of EHS-CCP-enrolled children being together in any one class. The grantee and their partners will need to work together to establish a realistic budget that supports raising the level of quality in centers and classrooms that provides the greatest benefits for the maximum number of enrolled EHS-CCP and non-EHS-CCP children.

In center settings where the group size exceeds eight, enrolled children must not lose their existing slots. Programs must not disrupt any services to enrolled infants and toddlers. The grantee and partner are expected to work together to develop a plan to gradually reduce group size—not to exceed eight—within the first 18 months of funding. This could be accomplished through attrition as children age out, or if space permits, opening additional classrooms. While the grantee and partner are taking measures to meet the required group size within 18 months, at no time can the ratios exceed four children to one teacher.

Family Child Care Group Size

For the family child care option, the maximum group size for one qualified teacher is six young children, with no more than two under the age of 2. The maximum group size is 12 young children, with no more than two younger than 18 months, cared for by two teachers. For the family child care option, whenever present, the child care provider's own children under the age of six must be included in the count.

The provider must meet EHS program ratios as long as EHS-CCP children are in care. If the provider wanted to serve more than six children, she would need to employ another caregiver. Supplemental funds are available to help support this early cost in the first 18 months of the project.

Staffing and Planning Shifts for Staff

As noted in prior sections, EHS-CCP providers are expected to provide full-day/full-year of EHS-compliant services to meet the needs of working families. Programs will need to plan for sufficient coverage that allows for primary caregiving relationships and continuity of care for EHS-CCP-enrolled children. Because the required EHS staffing ratio is one teacher for every four children and no more than eight children in one group or classroom, additional teachers and staff will be needed to cover full hours of operation and conduct the range of duties (e.g., lesson planning, reflective supervision, etc.) necessary to provide EHS-CCP services.

Grantees should engage their partners in long-range planning to design and implement the staffing structure that can best meet the requirements of the EHS-CCP. Programs may structure their staffing patterns and plan work shifts to best support the needs of the families they serve as long as all EHS health and safety requirements are met. Programs may decide to use part-time/full-time substitute or floating staff members to support coverage for the full 10-hour day; however, the infants and toddlers should have a designated primary teacher. For example, one teacher may open a classroom and a second teacher could come in slightly later. For a classroom of eight children, there must be at least two qualified teachers present on-site at all times. In this project, six hours is not considered full working day. A standard work day for an individual staff is typically eight hours and should meet Fair Labor Standards Act¹⁰ regarding required break periods (e.g., lunch, break). Teachers also should have paid time built into their day to plan, maintain documentation, apply assessment data to curriculum planning, meet with family service staff, communicate with families, engage in supervision and reflection, attend training, individualize services, conduct other data collection activities, etc. These conditions will require additional staff members with the appropriate skills and training to provide short breaks and, as available, provide time for the teacher to engage in planning and other out of classroom responsibilities.

¹⁰ See Department of Labor, Fair Labor and Standards Act resources at: <http://www.dol.gov/whd/flsa/>

Staff Qualifications and Credential Requirements

EHS-CCP grantees should work with partners to develop professional development plans for all staff working on this project to ensure that all teachers (including long-term substitutes or floaters) meet or can demonstrate that they making progress toward meeting the required EHS qualifications. Substitute teachers and/or floaters may be teachers who work with specific classrooms and/or centers on either an as-needed or more regular basis to ensure adequate staffing ratios are met at all times. Supplemental funds are available to help support this early cost in the first 18 months of the project.

EHS-CCP teachers must have a minimum of a Child Development Associate (CDA) and training with an infant/toddler focus or comparable credential from their state. Teachers who have a degree or other credential in early childhood education with a focus on infants and toddlers (at least commensurate to what is required for an Infant/Toddler CDA) do not need a CDA. All EHS-CCP teaching staff are expected to meet the qualification requirements within 18 months of receiving the grant. Family child care providers have additional time to meet this requirement and need to enroll in the appropriate CDA (or commensurate program) within six months and have two years to become certified. If teaching staff or family care providers are unable to complete these requirements within timeframes listed, the EHS-CCP grantee and their partners must provide evidence that their staff are making sufficient progress toward receiving the required certifications.

Expanding professional development opportunities through EHS-CCP will increase the cadre of infant/toddler teachers across the country. The grantee and their partners can successfully work together to find ways to do this. For example, partnerships can leverage CCDF-funded professional development registries and scholarships to support providers pursuing higher teacher qualifications to meet EHS standards. Similarly, local EHS training and technical assistance funds can be targeted to community providers to increase the pool of qualified professionals in the community who can serve children served in both EHS and child care. Some innovative partnerships have come together to create a shared pool of qualified substitutes and floater teachers who can be available across several child care centers and family child care homes in the grantee's service area. ACF strongly encourages and supports these innovative partnership approaches to meet the staffing and credential requirements and provide ongoing staff training and professional development for EHS-CCP grantees and partners.

Federal Oversight and Monitoring

Ongoing federal oversight is the process by which federal staff works with grantees to ensure that their EHS-CCP projects are meeting the overall requirements and expectations of the grant. Oversight is a process of ongoing communication and feedback with the assigned ACF staff (which may include a regional program specialist or program manager from OHS and OCC, as well as the regional fiscal grants specialist) to support the grantee's implementation. For the first 18 months and throughout the life of the grant, federal oversight also may include identifying areas that need additional support and the provision of intensive technical assistance to ensure appropriate implementation and management of the program.

Formal monitoring of grantee compliance with the Early Head Start standards and HSPPS will not take place until after the first 18 months of the grant. However, during the first 18 months, all EHS-CCP grantees will participate in a baseline assessment that will include a review of environmental health and safety issues, fiscal management issues, and an analysis of the status of other key elements of the partnership funded through EHS-CCP. The purpose of this baseline is to assess initial grantee and partner capacity across multiple domains and to help improve the quality of the partnerships in this early stage of development. It also will be used to identify additional technical assistance or support that may be needed by the grantees and their partners to ensure that they are on track for successful implementation and can meet all EHS requirements within 18 months.

It is important to note that ACF has the authority to suspend or terminate grantees if any egregious violations are identified during the first 18 months or at any other point during the five-year project period, as provided in the Head Start Act. Deficiencies that are found in the first 18 months will not be used to determine the need to compete for a new grant in the Designation Renewal System (DRS).

Deficiencies that are serious health and safety concerns will be cited for immediate correction (e.g., child abuse and neglect, dangerous facilities, uncontained asbestos) and reported to the appropriate state agency (e.g., child care licensing, child welfare). After the first 18 months, EHS-CCP grantees will be subject to the formal Head Start and Early Head Start aligned monitoring process and the DRS, which affect all Head Start and Early Head Start grants on definite project periods. Subject to availability of funds, at the end of this project period, some grantees will qualify to receive a five-year grant, non-competitively. Grantees will need to compete for a new five-year grant in their service area if they meet any of the seven conditions in HSPPS [45 CFR 1307](#).

General Resources

EHS-CCP Funding Opportunity Announcement, HHS-2015-ACF-OHS-HP-0814:
http://www.acf.hhs.gov/grants/open/foa/files/HHS-2015-ACF-OHS-HP-0814_0.pdf [PDF, 393KB]

National Center on Early Head Start - Child Care Partnerships (NCEHS-CCP):
<https://eclkc.ohs.acf.hhs.gov/hslc/tta-system/ehs-ccp/partnerships.html>

ACF webinar series on EHS-CCP (March to May 2014):
<https://childcareta.acf.hhs.gov/early-head-start-child-care-webinar-resources>

Public Law 113-76, 2014 Consolidated Appropriations Act:
<http://www.gpo.gov/fdsys/pkg/BILLS-113hr3547enr/pdf/BILLS-113hr3547enr.pdf> [PDF, 1.4MB]

Public Law 113-235, 2015 Consolidated Appropriations Act:
<http://www.gpo.gov/fdsys/pkg/BILLS-113hr83enr/pdf/BILLS-113hr83enr.pdf> [PDF, 1.5MB]

Partnership Agreement Resources

Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Awards (effective Dec. 26, 2014): <https://www.federalregister.gov/articles/2013/12/26/2013-30465/uniform-administrative-requirements-cost-principles-and-audit-requirements-for-federal-awards>

ACF-IM-HS-14-07 Office of Head Start Information Memorandum, New Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Awards:
https://eclkc.ohs.acf.hhs.gov/hslc/standards/im/2014/resour_im_007_12172014.html

Department of Health and Human Services 45 CFR Part 75 Implementing Regulations:
<https://www.federalregister.gov/articles/2014/12/19/2014-28697/federal-awarding-agency-regulatory-implementation-of-office-of-management-and-budgets-uniform>

EHS-CCP Orientation materials – "Fiscal Systems: A Deeper Dive" session slides and handouts: [EHS-CCP Virtual Orientation](#)

Layered Funding Resources

OMB Circular A-133 Compliance Supplement 2014, see Department of Health and Human Services CFDA 93.575: Child Care and Development Block Grant, and CFDA 93.600: Head Start: https://www.whitehouse.gov/omb/circulars/a133_compliance_supplement_2014

EHS-CCP Orientation materials – "Maximizing and Managing Fiscal Resources for Partnership" session slides and handouts: [EHS-CCP Virtual Orientation](#)

Early Childhood Knowledge and Learning Center (ECKLC) Fiscal Management resources:
<https://eclkc.ohs.acf.hhs.gov/hslc/tta-system/operations/mang-sys/fiscal-mang/fiscal-management.html>

NCEHS-CCP Fiscal Issues: <https://eclkc.ohs.acf.hhs.gov/hslc/tta-system/ehs-ccp/fiscal.html>

Subsidy Resources

Office of Child Care's CCDF Reauthorization Resources:
<http://www.acf.hhs.gov/programs/occ/ccdf-reauthorization>

Summary of Changes in CCDF Reauthorization Law:
<http://www.acf.hhs.gov/programs/occ/resource/ccdbq-of-2014-plain-language-summary-of-statutory-changes>

Frequently Asked Questions about CCDF Reauthorization:
<http://www.acf.hhs.gov/programs/occ/resource/ccdf-reauthorization-faq>

National Center on Child Care Subsidy Innovation & Accountability:
<https://childcareta.acf.hhs.gov/subsidy-innovation-and-accountability>

Citizenship Verification Resources

OCC Program Instruction CCDF-ACF-PI-2008-01:
<http://www.acf.hhs.gov/programs/occ/resource/pi-2008-01>

OCC Program Instruction ACYF-PI-CC-98-08:
<http://www.acf.hhs.gov/programs/occ/resource/pi-cc-98-08>

Staffing and Professional Development Resources

Head Start Program Performance Standards section 1306.20(g)(1) – additional information about center-based and family child care ratio requirements:
<https://eclkc.ohs.acf.hhs.gov/hslc/standards/hspps/1306>

Early Head Start National Resource Center (EHS NRC) Tip Sheets on Program Design and Management: <http://eclkc.ohs.acf.hhs.gov/hslc/tta-system/ehsnrc/comp/program-design>

Fair Labor and Standard Act resources: <http://www.dol.gov/whd/flsa/>

Head Start Program Performance Standards:
<https://eclkc.ohs.acf.hhs.gov/hslc/standards/hspps/45-cfr-chapter-xiii/45-cfr-chap-xiii-eng.pdf>
[PDF, 2.7MB] (see pp. 140-142)

Early Educator Central: <https://earlyeducatorcentral.acf.hhs.gov/>

ECLKC Professional Development Resources: <http://eclkc.ohs.acf.hhs.gov/hslc/tta-system/pd>

Federal Oversight and Monitoring Resources

Head Start Program and Performance Standards:
<https://eclkc.ohs.acf.hhs.gov/hslc/standards/hspps> or full version at
<https://eclkc.ohs.acf.hhs.gov/hslc/standards/hspps/45-cfr-chapter-xiii/45-cfr-chap-xiii-eng.pdf>
[PDF, 2.7MB]

EHS-CCP Baseline Resources: <https://eclkc.ohs.acf.hhs.gov/hslc/grants/monitoring/additional-resources.html>

ECLKC Grants and Oversight: <http://eclkc.ohs.acf.hhs.gov/hslc/grants>