



CENTER FOR FAMILY POLICY AND PRACTICE

POLICY BRIEFING

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Helping Parents in Low-Wage Jobs Access Affordable Child Care: Opportunities Under the Reauthorized Child Care Development Block Grant

A brief from the National Women's Law Center (NWLC) engages states on the implementation of revisions to the Child Care Development



Block Grant (CCDBG). The brief provides suggestions for states to take advantage of this opportunity and to increase access to child care assistance while also expanding the availability of safe and attainable childcare options for low-income families.

Over 23 million workers are employed in low-wage jobs and half of these workers report working nonstandard schedules. Difficult schedules pose issues for parents not only in obtaining stable childcare, but also in accessing childcare assistance due to policies that are structured to support parents with stable work schedules. [In November 2014, the CCDBG was reauthorized](#) to give states the opportunity to better meet the needs of parents in low-wage jobs with irregular schedules. It's important to consider the impact of access to affordable child care on noncustodial parents as well. Low-income noncustodial parents tend to work volatile schedules which lead to fluctuations in their ability to make consistent child support payments. This inability to make payments increases a noncustodial parents' debt and (in some states) the risk of incarceration. Parental incarceration will impact children, affecting their access to some benefits as well as healthy attachments. It's unlikely that incarceration of indebted noncustodial parents supports economic security and stability for children.

According to the NWLC brief, some of the new provisions to the reauthorized CCDGB program include requirements for states to describe how they plan to increase the supply and improve the quality of child care during non-traditional hours. The new law also has several provisions designed to reduce the burden on parents to obtain and retain assistance, even when their income or work hours/schedule fluctuates. This reduction in administrative burden includes the ability to maintain eligibility for 12 months regardless of temporary changes in family income as long as income does not exceed 85% of the state median. The law also recognizes that reducing a provider's payment when a child fails to attend care creates major disincentives for child care providers to accept children whose parents have volatile schedules. Under the new reauthorization, states must implement new enrollment and eligibility practices so that provider reimbursement is not linked to a child's absences and to create payment practices that encourage providers to serve children on CCDBG assistance.

To access the brief: [http://www.nwlc.org/sites/default/files/pdfs/ccdbg_reauthorization_low-wage_workers_issue_brief .pdf](http://www.nwlc.org/sites/default/files/pdfs/ccdbg_reauthorization_low-wage_workers_issue_brief.pdf)

Comments on WIOA Data Reporting Requirements

The Workforce Innovation and Opportunity Act (WIOA), is currently being rolled out in most states after going into effect on July 1, 2015. The new legislation brings changes in reporting requirements for states and opportunities to advocate for further

alterations regarding any identified loopholes before state plans are submitted on March 3, 2016. In her letter to the Office of Policy Development and Research on September 18, 2015, CLASP analyst Anna Cielinski encourages the Department of Labor to clarify the reporting requirements for WIOA. The letter identifies discrepancies between what the WIOA statute and the federal WIOA Data Specification Document state on credential attainment reporting. This discrepancy is problematic as it creates significant disincentives to enroll participants in education and training if they are deemed less likely to succeed. This could be detrimental to those with the most barriers, including homeless individuals, those with basic skill deficits, parents with childcare needs, and noncustodial parents with high child support debt.

The letter also questions the Measurable Skill Gains Reporting Requirements with regard to attainment of secondary/postsecondary transcripts. Apparently, this measure counts credits for in-seat time, not the attainment of competencies which is necessary for employment access and retention, and ultimately for economic stability. Also, states and practitioners need clarity and guidance with regard to the qualifications for “other recognized diploma, degree, or certificates”. Without strong descriptive guidance about what can and cannot be included in this category, this measure could be as ineffective as it was under WIA where certificates held little meaning in the workforce.

Overall, CLASP identifies many areas of WIOA reporting that are insufficiently clear, descriptive, or directive. And there is some concern that states could interpret these current definitions in a variety of ways, leading to a reduction in transparency, accuracy, and consistency of state and national data. This lack of consistency could detrimentally impact individuals with barriers as it allows the creaming of applicants in order to inaccurately boost reporting rates and thus move states away from enhancing the economic security of those most in need.

To access the letter: <http://www.clasp.org/resources-and-publications/publication-1/CLASP-Comments-on-the-Workforce-Innovation-and-Opportunity-Act-WIOA-Data-Reporting-Templates.pdf>

How Volatile Job Schedules Impact Access to Public Benefits

examining state policy and practice.

Traditional 9-5 jobs may be a thing of the past, particularly for workers in the service industry. According to CLASP, more than 40% of low-income workers receive less than one-week advance notice of their job schedules, and have little to no input into their schedules. Common scheduling challenges include: little advanced notice of shifts; fluctuations in shifts from day to day; variable and inadequate hours per week; being sent home from work early or called in last minute; split shifts; and working late night closings followed by early morning openings. These types of challenges make it difficult for parents to arrange consistent child care, transportation, attend appointments, hold additional jobs, attend job trainings, or enroll in higher education and they add fatigue and stress detrimentally impacting family life and health outcomes for children. Job scheduling instability



leads directly to income instability as budgeting is impossible without anticipation of weekly income based on work schedule.

The CLASP brief highlights the reality that low-wage jobs means low-income workers with volatile schedules find themselves in need of income support from public benefit programs like TANF and SNAP. Ironically, the scheduling issues that contribute to workers' financial insecurity and consequent need for public resources often create obstacles to accessing these benefits as some require recipients to work a set number of hours. As a result of unpredictability in working hours, workers scheduled for fewer hours may receive a decrease of wages and public benefits. This detrimentally impacts parents regardless of their living situation or custodial arrangements.

Although not mentioned in this brief, noncustodial parents often depend on these benefits to sustain housing and avoid prosecution and incarceration for non-payment of court-ordered child support. And, for custodial parents, ironically, a temporary increase in work hours causes concern as workers who fail to report temporary increases in work can be denied benefits or charged with fraud for non-reporting. According to CLASP, Parents with young children, the primary recipients of benefit programs, are among the most likely to experience volatile job schedules. Nearly 70% of mothers and 80% of fathers with children 12 and under work hourly jobs and are given weekly hours that fluctuate up to 40%.

To access the brief: <http://www.clasp.org/resources-and-publications/publication-1/2015.09.16-Scheduling-Volatility-and-Benefits-FINAL.pdf>