Alameda County

Individualized Child Care Subsidy Pilot

Local Child Care Policy and Evaluation Plan

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EXECUTIVE SUMMARY

Assembly Bill 833 (AB833), signed by Governor Jerry Brown on October 7, 2015, authorizes an Alameda County Child Care Subsidy Project (the Pilot). This legislation, designed in partnership with local child care stakeholders and carried by Assemblyman Rob Bonta, authorizes a plan specifically tailored to the needs and goals of the local community. The Pilot was conceived as a means to explore solutions to the problems that the state's "one-size-fits-all" child care subsidy system presents to high cost counties such as Alameda. Without any additional funds, the Pilot seeks to demonstrate the effects of limited local control and flexibility and stakeholder efficiency to meet the goals of family self-sufficiency and to stabilize a fragile child care infrastructure.

The Pilot approach allows Alameda County to address two fundamental concerns: first, that families barely earning enough to meet the high costs of living in the County are nevertheless considered too high income to qualify for child care subsidies; and second, that the state reimbursement rates to providers contracted to provide high quality child care are so low that contractors cannot cover their costs, and therefore, are unable to utilize their full allocation of state and federal child care and child development funds. As a result, fewer children receive subsidized care through these providers and child care spaces are lost to the County.

AB833 offers Alameda County the opportunity to test strategies to overcome these challenges and pilot efficiencies that may be replicated statewide to improve the stability of the subsidized child care system in California.

In particular, AB833 allows Alameda County to establish rules for:

- *Income eligibility* for families with income above the state eligibility cutoff ;
- *Family fees* for families with income above the state eligibility cutoff;
- *Provider reimbursement rates* for contracted care; and
- Ways to *maximize the efficient use of contracted funds*.

Pilot Goals and Plan Components

Increase the viability of the Alameda County subsidized child care system for contractors.

A key goal in creating AB833 is to increase stability and retention of child care contractors who are unable to meet their needs under the current system. Since the Pilot does not allow for additional funds to the County, the Pilot seeks to model funding flexibility and local control to maximize contractor earnings. Specific changes in the Pilot include the following:

- Reallocate contract funds from direct service contractors in Alameda County who are not fully earning their contracts to the Pilot. These funds will be used to implement higher contractor reimbursement rates (called the Pilot Reimbursement Rate or PRR). For CSPP contract the rate will be 7% higher, for CCTR contracts 6% higher and for CHAN contracts 1% higher. All calculations are subject to confirmation by the California Department of Education.

- Allow high-rate school districts to claim adjustment factors.

- Allow school-age programs to claim a Limited English Speaking factor for students.

- Restore the age eligibility for CSPP contracts to 2.9 years old.

Increase the ability of low-income families to move toward self-sufficiency through higher earnings.*

- Implement a higher income eligibility threshold for new and ongoing families compared to the state threshold. Under the proposed family fee schedule (Appendix A), a family of 4 would income out of subsidized care at a monthly income of $3,908. Under the Pilot, this same family would be eligible to enter and remain in until their monthly income reached $5,646.

- Implement the Pilot family fee schedule included in Appendix A. In the "transition" range of income between the statewide and County Pilot income thresholds, a new family fee schedule has been established. The Pilot family fee schedule is based on the concept that a family should pay approximately 10 percent of their monthly income in monthly child care fees.

Increase the stability of care placements for families.* In addition to the plan elements listed above, the Pilot seeks to include elements that increase family stability and lessen disruptions to children and families.

- Allow 24-months or until the end of the fiscal year (whichever is longer) of family eligibility instead of reviewing eligibility every time the family changes their situation. Determine family eligibility based on either the previous month's income or the average of the previous year's income, whichever is in the "best interest of families." This would apply to all age children, in CCTR, CSPP, CHAN, Family Child Care Homes Education Network (CFCC), and Migrant (CMIG) contracts. The only events that would trigger a re-determination of eligibility would be: (1) if it benefits the family (i.e. lowering their

family fee); (2) if the family's income exceeds the maximum allowable by federal law; or (3) if the family qualifies because of job search. For job search, the eligibility period would be 12 months. This will allow families to achieve some level of financial stability. This is similar to a system already in place in Head Start programs. Additional information on 24-month eligibility is included in Appendix B.

- Reinstate sibling preference in enrollment.
- Allow state preschool agencies that serve children for two years to consider these families under the Pilot income thresholds rather than as new incoming students.

Monitoring of the Pilot's Effectiveness in Meeting County Goals

The County of Alameda will prepare an annual report on the progress of the Pilot project for submission to the Early Education and Support Division (EESD) by November 31st of each pilot year. These annual reports will provide four types of information. First, they will document the implementation of the Pilot, both for the County itself and to assist the state and other counties in considering the implementation of similar changes. Second, they will provide the results to date on each of the outcome measures described in the evaluation section of this report. Third, they will track conditions in the County, comparing Alameda County to elsewhere in the state as appropriate, to provide a context for the Pilot's progress. Finally, they will identify any modifications in the Pilot plan based on the previous year's experiences.

Note:

*Alameda County asks to include <u>all</u> AP contracts in the above elements of the pilot: specifically, the new income eligibility cutoff, new family fee schedule and 24 month eligibility. We have received indication from EESD that this request will not be approved. We believe this would unfairly discriminate against those who otherwise meet the eligibility requirements and create a complicated two-tiered system for Alameda County families. We would greatly appreciate EESD's reconsideration of this inclusive plan.

For purposes of expediting approval of the pilot plan for the remainder of our contractors, we are not including the formal AP request in this version of the plan but we plan to pursue other means to make this happen if EESD does not allow AP contractors to participate in the pilot.

1 INTRODUCTION

Assembly Bill 833 (AB833), signed by Governor Jerry Brown on October 7, 2015, authorizes the Alameda County Child Care Subsidy Project. This legislation, designed in partnership with local child care stakeholders and carried by Assemblyman Rob Bonta, authorizes a child care subsidy plan specifically tailored to the needs and goals of the local community. The Pilot was conceived as a means to explore solutions to the problems that the state's "one-size-fits-all" child care subsidy system presents to high cost counties such as Alameda. As stated in the AB833 legislation, the Pilot was designed "in an effort to provide access to affordable, high-quality services supported by adequate rates, integrated data systems, and a strong infrastructure that supports children and the educators that serve them." Without any additional funds, the Pilot seeks to demonstrate the effects of limited local control and flexibility and stakeholder efficiency to meet the goals of family self-sufficiency and to stabilize a fragile child care infrastructure.

The Pilot approach allows the County to address two fundamental concerns: first, that families barely earning enough to meet the high costs of living in the County are nevertheless considered too high income to qualify for child care subsidies; and second, that the state reimbursement rates to providers contracted to provide high quality child care are so low that contractors cannot cover their costs, and therefore, are unable to utilize their full allocation of state and federal child care and child development funds. As a result, fewer children receive subsidized care through these providers and child care spaces are lost to the County.

AB833 offers Alameda County the opportunity to test strategies to overcome these challenges and pilot efficiencies that may be replicated statewide to improve the stability of the subsidized child care system in California.

In particular, AB833 allows Alameda to establish rules for:

- *Income eligibility* for families with income above the state eligibility cutoff;
- *Family fees* for families with income above the state eligibility cutoff;
- *Provider reimbursement rates* for contracted care; and
- Ways to *maximize the efficient use of contracted funds*.

However, AB833 provides the County with only limited flexibility in designing its subsidy rules. Notably, there are no additional resources for the Pilot – only unearned and unallocated funds from existing Title V contracts may be used. Additionally, there are four fundamental limitations of the Pilot:

- No family who would have been eligible under state rules can either become ineligible or

be asked to pay higher family fees;
- Provider participation is entirely voluntary;
- The number of child days of enrollment across participating providers must increase overall from the base year;
- EESD has indicated they will not allow CAPP contractors to participate (see page 4).

Within these limitations, however, Alameda County has drafted a local child care subsidy policy that aims to benefit participating families by allowing them to remain income eligible for subsidies, helping maintain stable child care and early childhood education arrangements, as their earnings increase beyond the current income cutoffs. This policy can also benefit direct service contracted center providers, not just by allowing them to serve children longer, but also through modest increases in the Standard Reimbursement Rate (SRR). Finally, the pilot aims to increase the overall supply of subsidized care by maximizing the use of currently underutilized funds. By turning back fewer "slots" (in underearnings), the Pilot plans to increase the number of child days of enrollment.

Overarching Goals for the Alameda Child Care Subsidy Pilot Project

Recognizing the needs of the County, the potential benefits for families and providers, and the limitations of the legislation, the Alameda Child Care Subsidy Pilot Project seeks to achieve several key goals:

Goal 1: Increase the viability of the Alameda County subsidized child care system for contractors.

Goal 2: Increase the ability of low-income families to move toward self-sufficiency through higher earnings.

Goal 3: Increase the stability of care placements for families.

Requirements for the Individualized County Subsidy Plan

This plan represents the product of a number of planning steps established by the Legislation. To meet the requirements for implementation of new child care subsidy rules, the plan incorporates four elements: (A) an assessment of the County's needs and goals for the Pilot including identification of the barriers that exist to meeting County goals under the current system; (B) development of a local policy that addresses these barriers to better meet the County's goals; (C) recognition "that all funding sources utilized by direct service contractors that provide child care and development services in Alameda County are eligible to be included in the child care subsidy plan;" and (D) establishment of measurable outcomes.

2 LOCAL CHILD CARE NEEDS AND BARRIERS

One component of the Alameda Child Care Subsidy Plan as outlined in the legislation is an assessment that examines "whether the current structure of subsidized child care funding adequately supports working families" and identifies "barriers in the state's child care subsidy system that inhibit the County from meeting its child care goals." Specifically, the legislation requires the following elements be included in an assessment of needs and barriers:

- General demographics
- Trends in the County's unemployment and housing affordability index
- County's self-sufficiency income level
- Current Supply of available subsidized child care
- Level of need for various types of subsidized child care services
- Cost of providing child care
- Standard reimbursement rates and regional market rates

We begin this section by discussing the demographics of families in Alameda County, the cost of living, and the current need and supply of subsidized child care. We will conclude this section with a discussion of the cost of providing child care in Alameda County.

There are over 225,000 children living in Alameda County with potential child care needs from a diverse set of backgrounds.

As of 2014, there were 333,286 children living in Alameda County (Table 1 on the next page). Of these children, just over two-thirds live in households where all of the parents in the household work. Approximately one third of these children are under six years of age and two-thirds are six to 17 years old. For both age groups, children in Alameda County have a higher share of households with both parents working than statewide. Among children under six years of age in Alameda County, 65 percent have all parents working compared to 61 percent statewide. For children six to 17 years of age, the percent increases to 69 percent in Alameda County and 66 percent statewide.[1]

[1] 2014 American Community Survey 1-Year Estimates

This translates into 74,297 children under six and 150,796 children six to 17 with both parents working. The number of children with all parents working only approximates the demand for child care. It may overstate the demand from working parents because a number of parents set their work schedules to allow for split shifts where one parent is able to care for the children. Additionally, it does not account for families with other caregiving situations such as relatives, babysitters, or nannies.

Table 1: Alameda County Children with All Parents Working, 2014 Estimates

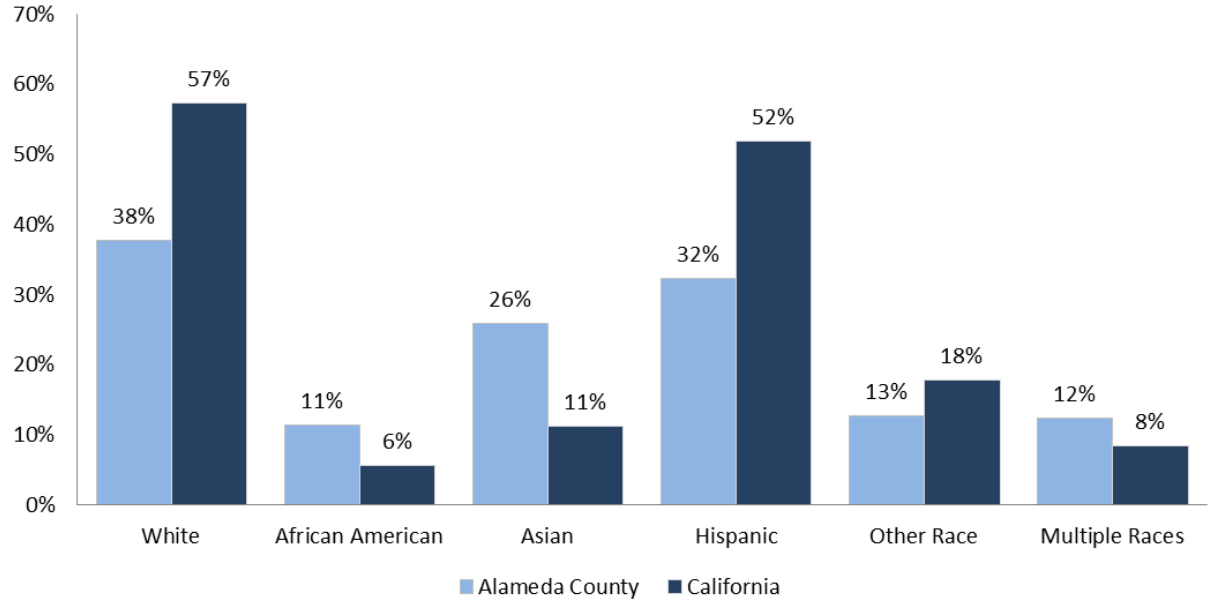
Age Category	Number of Children in Alameda County	Share of Children 0-17	Share with all Parents Working	Number of Children Needing Care
Under 6 years	115,187	35%	65%	74,297
6 to 17 years	218,099	65%	69%	150,796
Total	333,286	--	--	225,093

Source: 2014 American Community Survey 1-Year Estimates (Table C23008)
http://factfinder.census.gov/faces/tableservices/jsf/pages/productview.xhtml?pid=ACS_14_1YR_C23008&prodType=table

Alameda County has a racially diverse group of children less than 18 years of age (Figure 1). Children in Alameda County are less likely to be White (38 percent in Alameda compared to 57 percent statewide) or Hispanic (32 percent in Alameda compared to 52 percent statewide). It is worth noting that race and ethnicity are not mutually exclusive categories so percentages do not add up to 100 percent. So, while 38 percent of Alameda County residents identify as White, 22 percent identify as White, not Hispanic or Latino. Just over one quarter (26 percent) of Alameda County children are Asian, compared to about one in 10 statewide (11 percent). The share of children that identify as African American is also higher in Alameda County (11 percent compared to six percent statewide). Additionally, the share of children that identify as multiple races is higher in Alameda County compared to the share statewide.

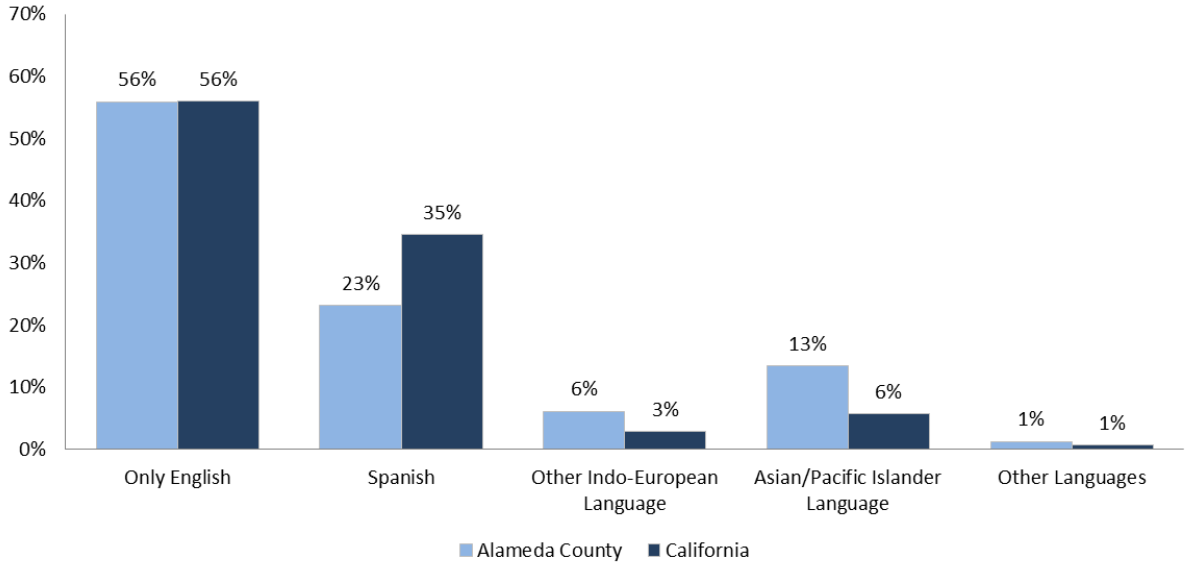
Compared to the state, Alameda County has a much larger share of its population that speaks an Asian/Pacific Islander Language and Other Indo-European Language at home and a smaller share that speaks Spanish at home. Fifty six percent of children speak only English at home in Alameda County, which is the same share as statewide (Figure 2).

Figure 1: Race/Ethnicity of Alameda County Children, 2014



Source: 2014 American Community Survey 1-Year Estimates (Table S0901)
http://factfinder.census.gov/faces/tableservices/jsf/pages/productview.xhtml?pid=ACS_14_1YR_S0901&prodType=table

Figure 2: Language Spoken At Home of Alameda County Children, 2014



Source: 2014 American Community Survey Data (Table B16007)
http://factfinder.census.gov/faces/tableservices/jsf/pages/productview.xhtml?pid=ACS_14_1YR_B16007&prodType=table

While Alameda County has a smaller share of families making less than $50,000 per year, families pay far more in cost of living. Even with higher incomes Countywide, a 2016/2017 Community Action Plan created for the Alameda County-Oakland Community Action Partnership found that approximately one in six children live in poverty in Alameda County.[2]

Table 2: Income Distribution of Alameda County Families with Children Under 18, 2014

Income Category	Alameda County	California
Less than $25,000	13%	20%
$25,000 to $50,000	15%	21%
$50,000 to $75,000	12%	15%
$75,000 to $100,000	11%	11%
$100,000 to $150,000	19%	15%
$150,000 and up	29%	18%

Source: 2014 American Community Survey 1-Year Estimates (Table B19131)
http://factfinder.census.gov/faces/tableservices/jsf/pages/productview.xhtml?pid=ACS_14_1YR_B19131&prodType=table

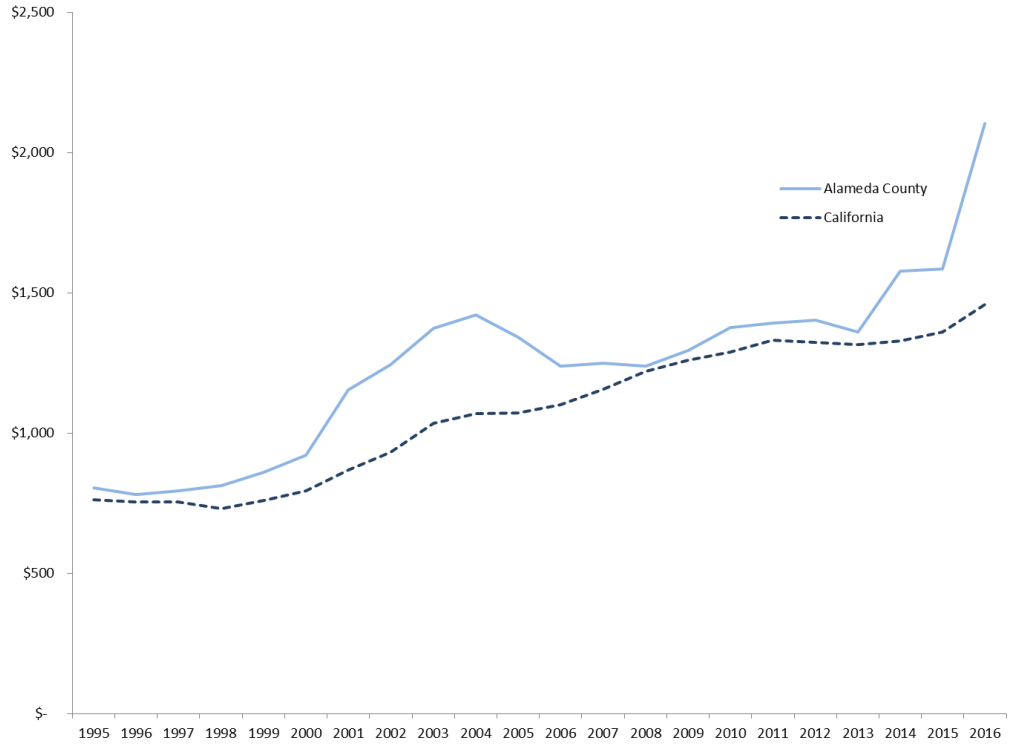
Housing costs in Alameda County are substantially higher than fair market rents (FMR) statewide and steadily increasing, even during economic downturns.

As one can see in Figure 3, Alameda County rents have steadily increased in the last 10 years. The rent cost in 1995 for two bedrooms was $804 dollars, and by 2016 the cost had more than doubled. The Department of Housing and Urban Development (HUD) defines the FMR as the rent level where 40 percent of recent movers pay less than the FMR and 60 percent pay more than the FMR. As shown in Figure 4, the fair market rent is 44 percent higher than the state ($2,103 in Alameda compared to $1,458 statewide). Families are considered to experience a high housing cost burden when they spend more than 30 percent of their income on housing. In Alameda County with a rental cost of $2,103, a family would need to earn $84,120 to spend 30 percent of their income on rent. Alameda's high cost of housing means that even before paying for child care, the income required to meet basic needs in this County is much higher than elsewhere in the state.

[2] http://www2.oaklandnet.com/oakca1/groups/contributor/documents/report/oak053861.pdf

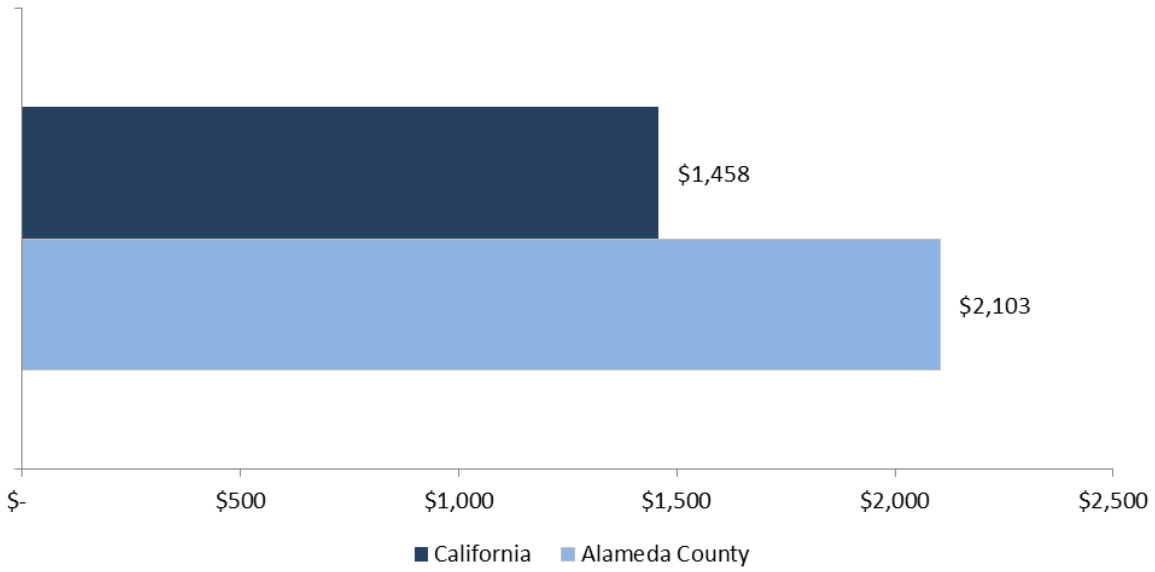
Even when unemployment rates have increased, there is no evidence of a dip in rent prices. As shown in Figure 5 on the next page, Alameda unemployment rates reached their highest point in 2010, but that did not correspond to substantial changes in housing prices.

Figure 3: Fair Market Rents (FMR), 1995-2016 (2 Bedrooms)



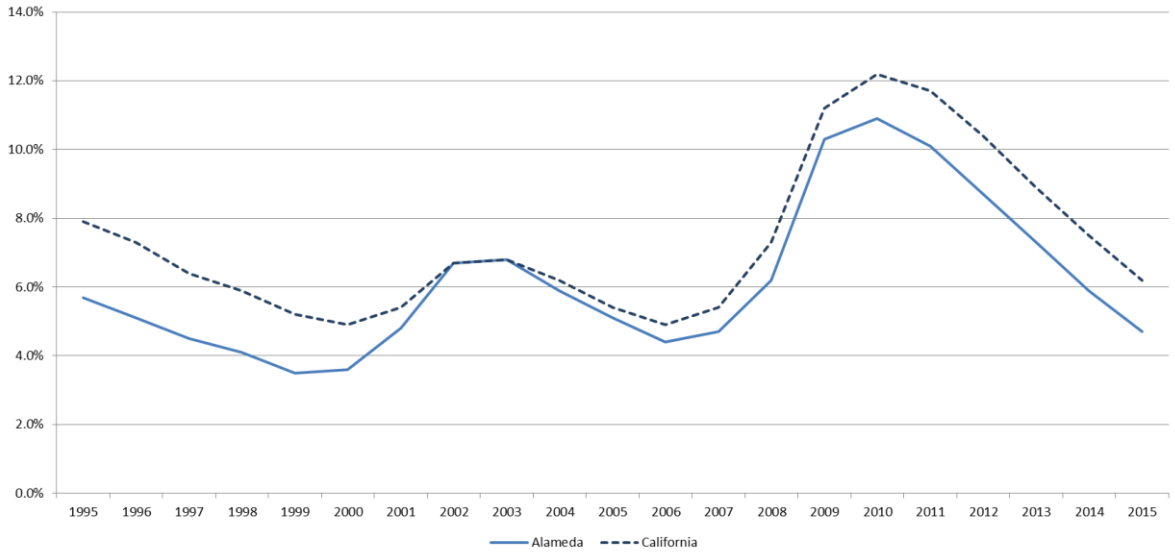
Source: U.S. Department of Housing and Urban Development, Fair Market Rent
https://www.huduser.gov/portal/datasets/fmr/fmrs/FY2016_code/2016state_summary.odn

Figure 4: California and Alameda County Fair Market Rents, 2016 (2 Bedrooms)



Source: U.S. Department of Housing and Urban Development, Fair Market Rent
https://www.huduser.gov/portal/datasets/fmr/fmrs/FY2016_code/2016state_summary.odn

Figure 5: Share of Unemployed Persons, 1995-2015

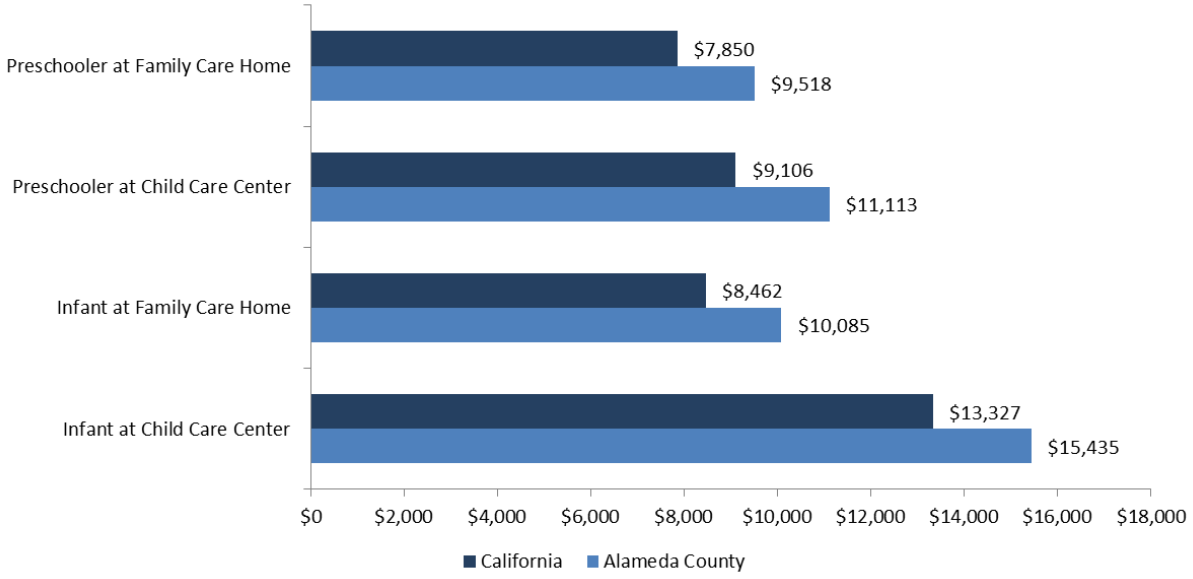


Source: Bureau of Labor Statistics; Labor force data by County, 1995-2015 annual averages http://www.bls.gov/lau/#tables

In addition to higher housing prices, Alameda residents pay more for child care in both family care homes and child care centers.

In both family care homes and child care centers, Alameda residents can expect to pay approximately $2,000 more annually for child care than residents statewide. The cost of care for an infant in Alameda County is $15,435 annually ($1,286 monthly) in a child care center and $10,085 annually ($840 monthly) at a family care home. For a preschooler in Alameda the costs are $11,113 annually ($926 monthly) at a child care center and $7,850 annually ($654 monthly) at a family care home.

Figure 6: Annual Cost of Child Care, by Age Group, 2014



Source: California Child Care Resource & Referral Network, California Child Care Portfolio (Nov. 2015); Cost data are from the Child Care Regional Market Rate Survey, 2014.
http://www.kidsdata.org/topic/1849/child-care-cost-age-facility/table#fmt=2358&loc=2,127&tf=79&ch=984,985,222,223&sortColumnId=0&sortType=asc

Across multiple measures of self-sufficiency, Alameda County families pay more than families statewide.

Across three measures of basic needs for families – the Housing Wage income from the U.S. Department of Housing and Urban Development (HUD), the California Budget Project's (CBP) basic family budget, and the Wider Opportunities for Women (WOW) self-sufficiency standard – Alameda County consistently costs more compared to the state. This difference is especially pronounced when child care costs are included (Table 3).

Table 3: Self-Sufficiency Standards

Monthly Income for "Basic Needs" for a Family of Four	Alameda County	California
HUD "Housing Wage" Income[3]	$5,283	$4,620
CBP Monthly Family Budget[4]		
Without Child Care	$5,966	$5,688
With Child Care	$7,235	$6,796
WOW Self-Sufficiency Standards[5]		
Without Child Care	$4,779	-
With Child Care	$7,200	-
Income Cutoff for Child Care Subsidy	$3,908	$3,908

[3] The term "housing wage" is used in calculating the full-time work wage required to have housing cost no more than 30 percent of income. Thus, a self-sufficiency standard based on the housing wage is the fair market rent divided by 0.30. Source: U.S. Department of Housing and Urban Development, Fair Market Rent (Oct. 2014). http://www.kidsdata.org/topic/231/marketrent-unit/table#fmt=2257&loc=127&tf=84&ch=479,480,481,482,483&sortColumnId=0&sortType=asc

[4] Estimated family budget (for a 4-person family, both parents working) from the California Budget Project (CBP), Making Ends Meet: How Much Does It Cost to Raise a Family in California (December 2013). http://calbudgetcenter.org/MakingEndsMeet/

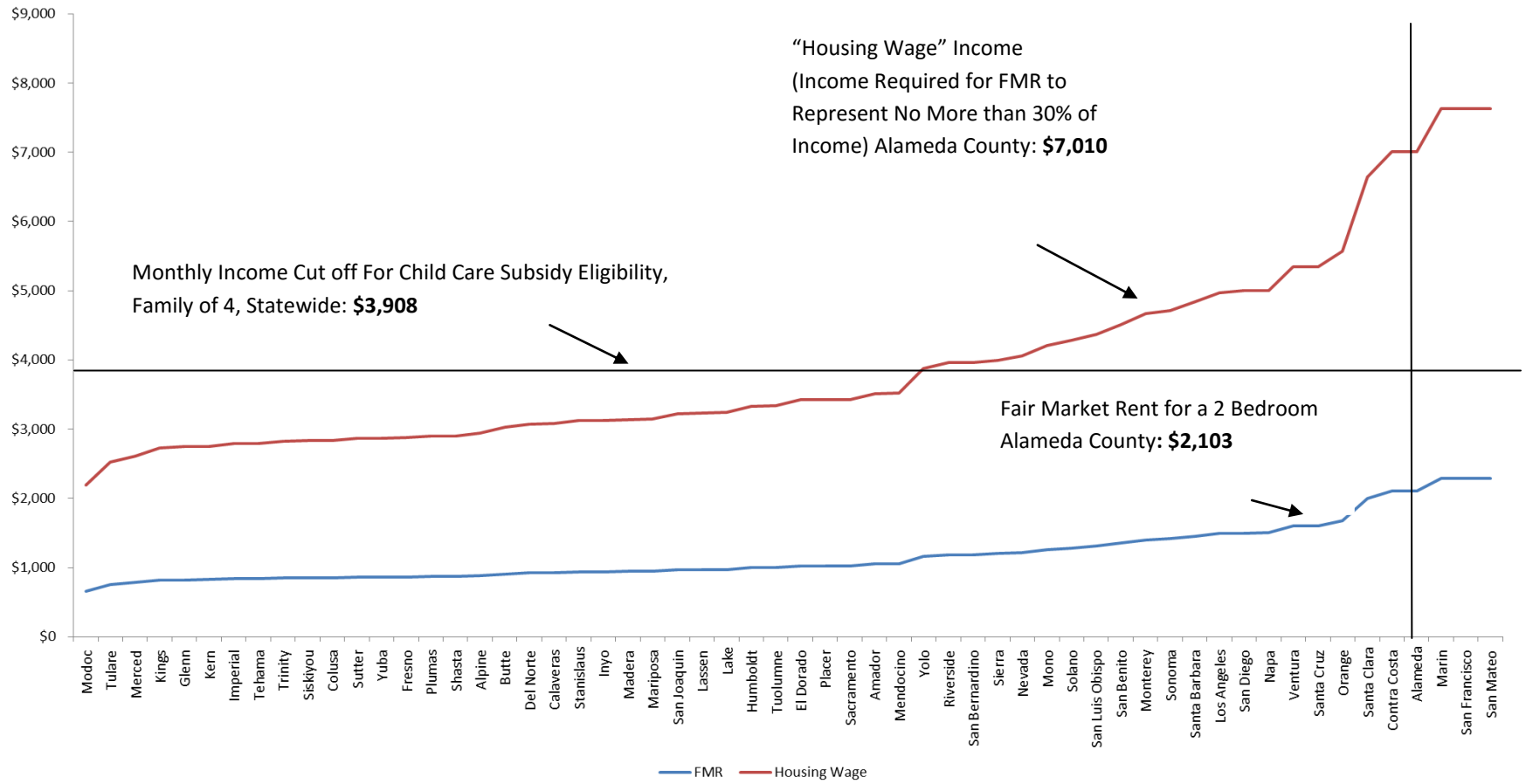
[5] Center for Community Economic Development: Wider Opportunities for Women (WOW): California Family Economic Self-Sufficiency Standard (Self-Sufficiency Standard) for a 4-person family with one infant and one preschooler. http://www.insightcced.org/tools-metrics/self-sufficiency-standard-tool-for-california/

When looking at self-sufficiency standards in Alameda, it becomes apparent that a statewide standard for child care subsidy eligibility is not aligned with costs for families. Under the state subsidy system, the maximum a family can earn and still receive subsidized care is 70 percent of the 2005 State Median Income (SMI) determined by the California Department of Finance (CA DOF) or $3,908 for a family of four. However, Alameda County is one of the highest cost counties with a "housing wage" that is $1,375 more than monthly income cutoff for subsidized care (refer to Figure 7 on the page 13).

Alameda is one of the highest cost Counties in the state (Figure 7). To address issues of self-sufficiency, voters have looked to wage increases, but income cutoffs for subsidized child care remain unchanged creating a conflict for families. As one example, in November 2014, Measure FF passed in Oakland raising the minimum wage to $12.25. In January 2016, the minimum wage increased again to $12.55[6]. For a family of four making the 2016 minimum wage in Oakland, with two parents working full-time, the family would earn $52,208 annually or $4,351 per month. Assuming this family needed to pay for child care, this would put them far below all measures of self-sufficiency identified in Table 3, but too high income to qualify for subsidized child care.

[6] Measure FF provides annual increases to Oakland's minimum wage based on the Consumer Price Index: http://www2.oaklandnet.com/Government/o/CityAdministration/d/MinimumWage/index.htm

Figure 7: Housing Costs, Income and Child Care Subsidy Eligibility by County, 2016



Source: U.S. Department of Housing and Urban Development, Fair Market Rent

The high cost of child care in Alameda County creates a disincentive for families when it comes to working more or accepting raises if it means they will lose their subsidized child care because the Regional Market Rate (RMR) is substantially higher than subsidized child care. At the top of the family fee schedule, a family of four making $3,908 pays a monthly full-time family fee of $373 dollars per month. If the family income becomes too high income for subsidized child care, that family faces a substantial increase per month to cover the regional cost of child care. Table 4 below shows the RMR ceilings, which are set at 85 percent of the Regional Market Rate established by the Regional Market Rate Survey. As one can see, these rates are substantially higher than family fees.

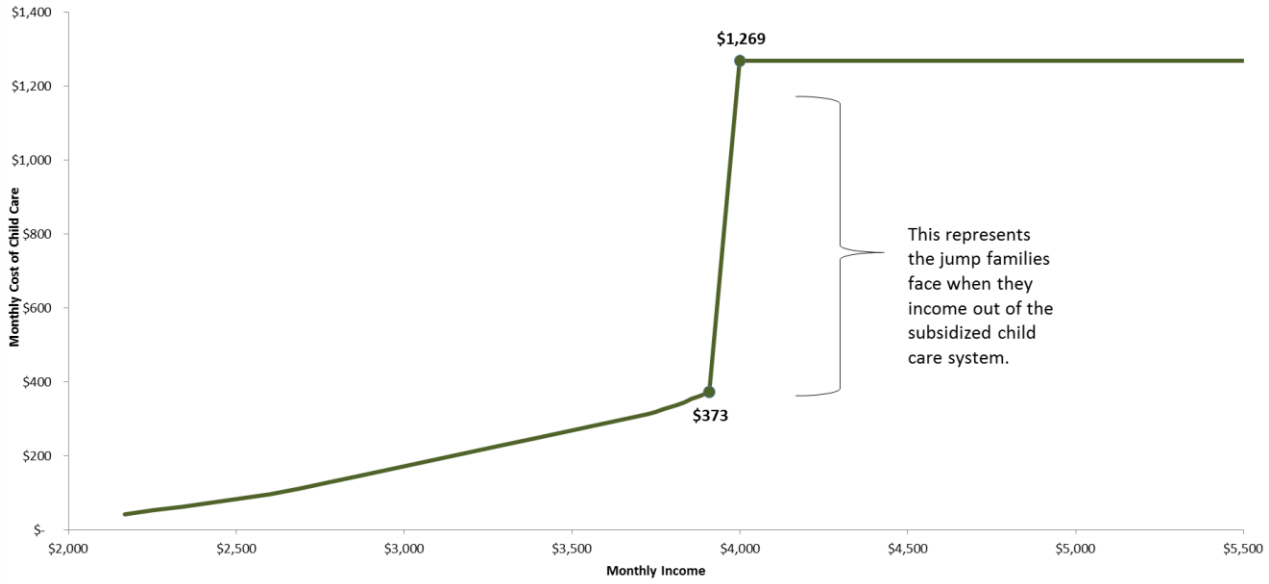
As shown in Figure 8 on the next page, a family's child care costs would increase to $1,269 when the family begins to pay for market rate child care. In reality, however, for many families this gulf is an underestimate. First, because the family fee is paid regardless of the number of children in subsidized child care, a family with several children could face an increase of several thousand dollars per month if their income were to rise above the income cutoff. Second, the RMR is based on a 2009 survey and is considered to be an underestimate of true market costs. In a high cost County like Alameda, the current family fee schedule and income cutoffs for subsidized care severely limit the self-sufficiency of families.

Table 4: Monthly Regional Market Rate (RMR) Maximum Alameda County, 2015

	Child Care Centers	Family Child Care Homes
Full-time Infant/Toddler	$1,410	$942
Full-time Preschooler	$1,030	$862
Full-time School Age	$747	$662

Source: California Department of Education, Regional Market Rate Ceilings http://www3.cde.ca.gov/rcscc/index.aspx

Figure 8: Family Fees Paid by Subsidized Families, by Income



Source: California Department of Education, Regional Market Rate Ceilings
http://www3.cde.ca.gov/rcscc/index.aspx

The demand for subsidized child care exceeds the current supply in Alameda County.

With the exception of preschool age children, only a small share of eligible families receive child care across all subsidy types (Table 5). For preschool age children, a sizeable percent received services (70.9 percent). The percent of children served is much lower for infant/toddler and school age children. For infant and toddler, the discrepancy between eligible families and those served is especially troubling if families are unable to find subsidized child care options, because infant and toddler care is typically the most expensive and hardest to find in the regular market.

Table 5: Number of Children in Eligible Households (below 70 percent SMI), With Both Parents Working

Age Range	Eligible Children	Children receiving services[7]	Share Served
Infant/Toddler (0-2)	10,548	1,919	18%
Preschooler (3-4)	10,603	7,521	71%
School Age (5-12)	24,405	3,311	14%
Total	45,556	12,751	28%

Source: American Community Survey analysis by American Institutes for Research Databrowser, 801A Export, Survey of Alameda County Head Start and Stage 1 contractors, and ACOE ASES enrollment

Reimbursement rates for direct service providers through the Standard Reimbursement Rate (SRR) are much lower than the RMR.

Although we cannot exactly assign costs of providing care to different age groups, we can utilize the maximum reimbursable amount available through the Regional Market Rate survey used for voucher payments and compare it to the maximum reimbursable amount available to direct Title V contractors through the SRR. It should be noted that that RMR reflects the rate families pay for care; it does not reflect the actual cost of providing care, which is particularly high in Alameda County. As shown in Table 6, the SRR is only 44 percent of the RMR for infant and toddlers, 58 percent for preschoolers, and is 79 percent for school age children. The large discrepancy, especially at younger ages, can make it especially difficult for contractors to continue to serve subsidized children in Alameda County. It is worth noting that contractors serving infants 0 to 18 months receive an adjustment factor of 1.7 and those serving toddlers 18 to 36 months receive an adjustment of 1.4, creating effective SRRs of $65.10 and $53.60 respectively. However, even with the adjustment, the SRR is much lower than the RMR for infants and toddlers.

[7] These numbers come from an unpublished Alameda County 2016 Needs Assessment and include Title V subsidized care, CalWORKs, Head Start, Early Head Start, and ACOE ASES enrollment.

Table 6: Estimated Costs and Reimbursement Rates for Child Care Centers in Alameda County, 2015

	Daily RMR ceiling	Standard Reimbursement Rate (SRR)	SRR as a % of Maximum RMR
Full-time Infant/Toddler	$86.64	$38.29	44%
Full-time Preschooler	$65.88	$38.53	58%
Full-time School Age	$48.47	$38.29	79%

Source: California Department of Education, Regional Market Rate Ceilings
http://www3.cde.ca.gov/rcscc/index.aspx

The data above indicate that Alameda County does merit being considered a high cost County that would benefit from a child care subsidy Pilot. Alameda County has substantially higher costs for housing and child care that impact both families and contractors providing Title V services. In the next section, we review strategies Alameda County has requested be included in the pilot to address these issues.

3 LOCAL POLICY FOR CHILD CARE SUBSIDIES

Below, we describe the overarching goals of the AB833 pilot and proposed changes. All changes proposed in this plan are subject to approval from the Local Early Care and Education Planning Council, the Alameda Board of Supervisors, and Early Education and Support Division at CDE.

Overarching Goals of the Pilot

The AB833 Pilot intends to stabilize the child care system, allow families to remain in care for a longer period with higher earnings, and implement strategies that stabilize child care placements for families. In addition to these goals, the pilot legislation requires that the Pilot increase the earned child days of enrollment (CDEs) compared to the baseline and maximize the take of child care dollars in the County. Below we describe each goal and the plan components the pilot intends to implement to reach each goal.

Increase the viability of the Alameda County subsidized child care system and the retention of contractors.

A key goal in creating AB833 is to increase stability and retention of child care contractors who are unable to meet their needs under the current system. Since the Pilot does not allow for additional funds to the County, the Pilot seeks to model funding flexibility and local control to maximize contractor earnings. Alameda County has requested the following specific changes in the Pilot:

- Reallocate contract funds in Alameda County from contractors who are not fully earning their contracts to the Pilot. These funds will be used to implement a higher contractor reimbursement rates (called the Pilot Reimbursement Rate or PRR). Additional information on the methodology is included in this section, and the proposal for increased reimbursement rates is provided in detail in the accompanying excel document.
- Allow high-rate school district contractors to claim adjustment factors.
- Allow school-age programs to claim a Limited English Speaking factor for students.
- Restore the age eligibility for CSPP contracts to 2.9 years old.
- Allow the Pilot to make contract transfers between agencies throughout the fiscal year pending approval from CDE on the time periods during which contact transfers can take place. Adjustments made between contractors will be monitored by the contractor

themselves, across the Pilot by County administrators, and at the state level by EESD. CDE must approve of all transfers between agencies before they are finalized.

Increase the ability of low-income families to move toward self-sufficiency through higher earnings.

- Implement a higher income threshold for new and ongoing families compared to the state threshold consistent with subsidy Pilots in San Mateo and San Francisco Counties. Under the proposed family fee schedule (Appendix A), a family of four would income out of subsidized care at a monthly income of $3,908. Under the Pilot, this same family would be eligible to enter and remain in care until their monthly income reached $5,646.

- Implement the Pilot family fee schedule included in Appendix A consistent with subsidy Pilots in San Mateo and San Francisco Counties. In the "transition" range of income between the statewide and County Pilot income thresholds, a new family fee schedule has been established. The Pilot family fee schedule is based on the concept that a family should pay approximately 10 percent of their monthly income in monthly child care fees.

Increase the stability of care placements for families. In addition to the plan elements listed above that will increase stability for families through higher earnings, Alameda County has requested to include elements that lessen disruptions to children and families.

- Allow 24-months or until the end of the fiscal year (whichever is longer) of family eligibility for all programs instead of reviewing eligibility every time the family changes their situation. Determine family eligibility based on either the previous month's income or the average of the previous year's income, whichever is in the "best interest of families." This would apply to all age children in CCTR, CSPP, CHAN, CFCC, and CMIG contracts. The only events that would trigger a re-determination of eligibility would be: (1) if it benefits the family (i.e. lowering their family fee); (2) if the family's income exceeds the maximum allowable by federal law; or (3) if the family qualifies because of job search. For job search, the eligibility period would be 12 months. This will allow families to achieve some level of financial stability. This is similar to a system already in place in Head Start programs. Additional information on 24-month eligibility is included in the Appendix.

- Reinstate sibling preference in enrollment.

- Allow state preschool agencies that serve children for two years to consider these

families under the Pilot income thresholds rather than as new incoming students.

Plan Components and Methodology

Whenever possible, AB833 will use the same methodology as previously implemented in Pilots in San Mateo and San Francisco Counties. This includes the strategy for calculating a "pilot reimbursement rate" (PRR) and a review of the methodology used in creating the already established family fee schedule.

Calculating a PRR:

The pilot reimbursement rate is determined by the number of participating contractors, their preferred level of service, their willingness to provide funds, and/or their willingness to expand enrollment. AB833 mandates that pilot participants on aggregate must increase their child days of enrollment compared to the baseline. Therefore, the PRR must satisfy three constraints:

- The available resources must allow contractors to increase pilot days of enrollment. No PRR can be established that would not allow for contractors who are fully earning their contracts to reach the baseline child days of enrollment.
- Contractors will not be required to provide or subcontract out excess resources involuntarily.
- The main resources available are funds that have been unearned by direct service providers in Alameda County.

The PRR and the strategies to maximize the efficient use of contracted funds are closely interlinked issues. Although some additional resources may become available through higher family fees, the primary funding for a higher reimbursement rate is unearned balances on existing contracts in Alameda County. Therefore, maximizing the PRR requires a reallocation of contract funds from under-earning providers to fully-earning providers. We anticipate that the California Department of Education will establish a policy, consistent with existing Pilots, mandating that any reserve account balances held by contractors are not considered available to the Pilot for the purpose of raising the PRR. However, contractors will continue to have access to these funds for one-time and emergency expenditures, in the same way they are currently available.

Unfortunately, there are several restrictions on the movement of funds across contracts. First, the funds cannot shift across contract types. Second, providers who do not choose to participate now cannot participate in the future. This strategy prevents providers from waiting to decide their

participation based on the success of the pilot and provides an incentive to participate up front. In turn, these initial decisions make the pilot a more concrete experiment, with outcome measures based on a stable panel of providers.

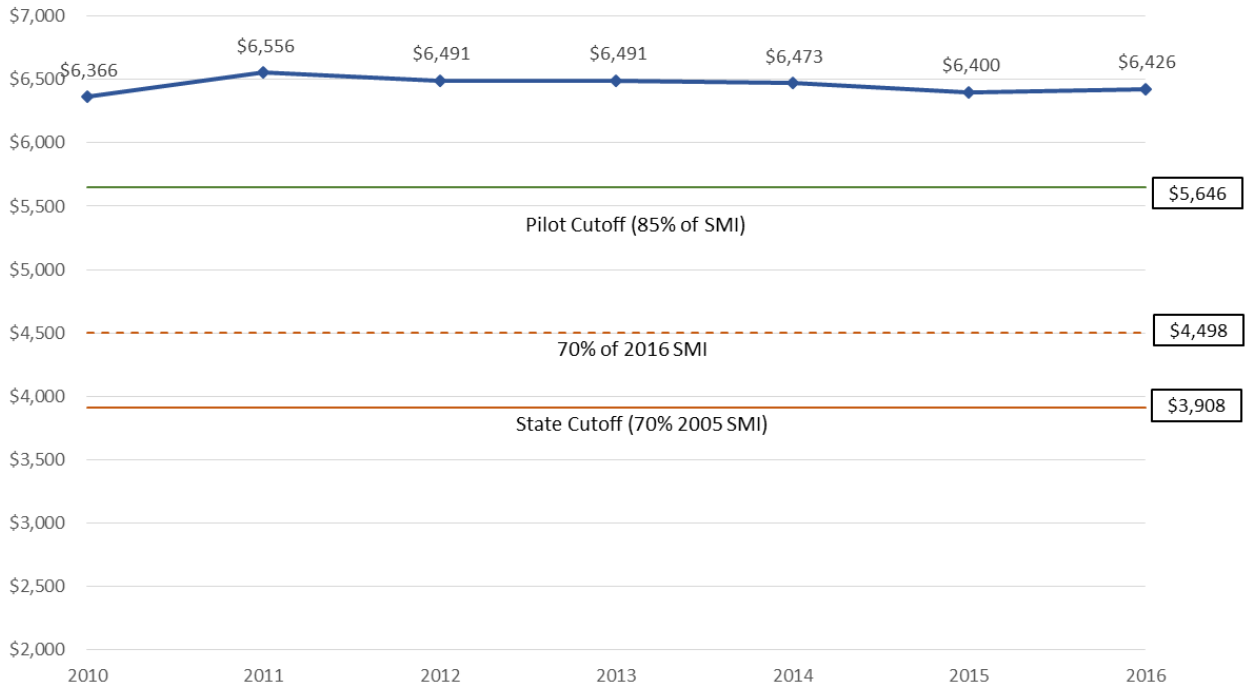
Based on our calculations, the PRR or "pilot reimbursement rate" will provide approximately a 7% increase over existing reimbursement rates for all CSPP contactors, a 6% increase for CCTR contractors and a 1% increase for CHAN contractors. All calculations are subject to confirmation by the California Department of Education.

Eligibility for Subsidies

In general, the pilot's eligibility rules are based on a guiding principle: wherever possible, Alameda County would like to maximize eligibility and availability without creating unintended incentives. While continuing to prioritize serving the lowest income families first, **both incoming and ongoing families** in Alameda County will be able to benefit from the expanded eligibility criteria. This allows the Pilot to serve the neediest families while allowing families the opportunity to increase wages and postpone the cliff they will face when they income-out of care.

Given the cost of living in Alameda County, this Pilot proposes that the income exit threshold at which participating families lose eligibility for subsidies equal the maximum allowable under federal regulations (which is the maximum allowable under AB833 and consistent with existing Pilots). Current federal regulations limit eligibility for subsidies paid through funds from the Child Care and Development Fund (CCDF) to 85 percent of the SMI from the United States Department of Health and Human Services (US DHHS). The current eligibility thresholds for subsidies in California are based on 75 percent of the 2005 SMI. The proposed family fee schedule will allow the Pilot to expand the family fee schedule and update income cutoffs with newly available data to account for increases in the SMI. At present, allowing Alameda County to use the Pilot income eligibility currently in place in other Pilot Counties will provide families the ability to increase their income by 44 percent before reaching the cutoff for subsidized care (Figure 9).

Figure 9: Median Income for 4-Person Families in California, 2010-2016

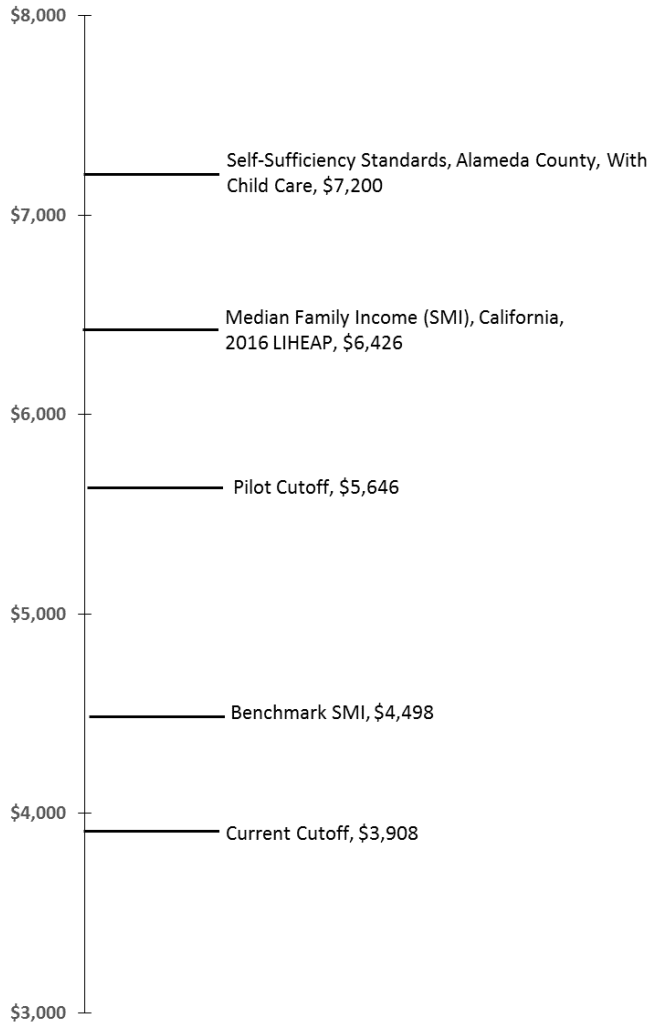


Source for Median Income: California State Median Income, LIHEAP Clearinghouse, http://www.liheapch.acf.hhs.gov/profiles/povertytables/FY2016/casmi.htm

The Pilot income thresholds will allow families the ability to take modest pay increases and move toward self-sufficiency without the threat of losing child care. However, even with the increased Pilot income threshold, families at the peak of the Pilot Family Fee Schedule will still be below the Wider Opportunities for Women self-sufficiency standard[8] (Figure 10).

[8] California Family Economic Self-Sufficiency Standard (Self-Sufficiency Standard) for a 4-person family with one infant and one preschooler. http://www.insightcced.org/tools-metrics/self-sufficiency-standard-tool-for-california/

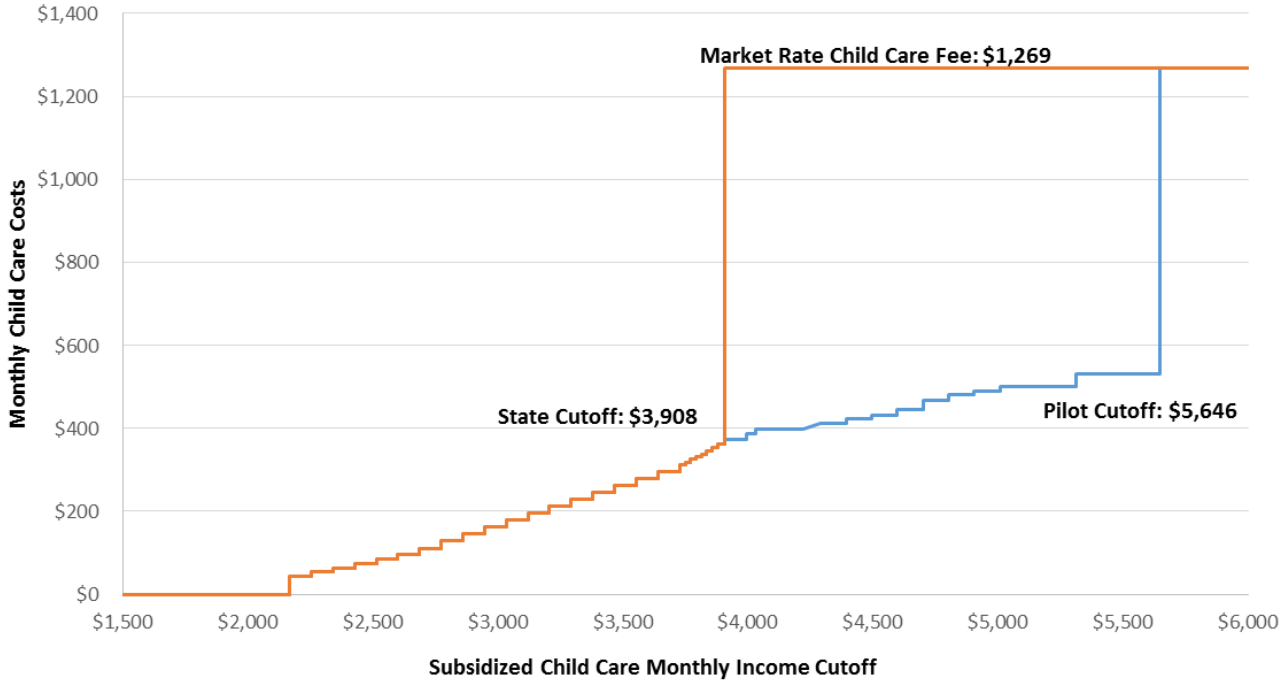
Figure 10: Pilot Income Compared to Self-Sufficiency Standards



Family Fees

Consistent with Pilots in other counties and direction from EESD, the family fee schedule uses the concept that families should pay approximately 10 percent of their monthly income in child care fees. It aims to postpone the cliff of child care costs until families have reached 85 percent of the state median income in order to allow children to remain in high quality subsidized child care for as long as possible (Figure 11). Families with more than one child in care are not asked to pay any additional fees and families who are already paying fees in the unsubsidized market are able to deduct those fees from any family fee they may owe.

Figure 11: Comparison of Pilot Cutoff and Market Rate Care



As of August 2016, Alameda County has met with all contractors to discuss participation in the Pilot, and all Alameda County contractors have signed agreements.

Table 7: Participating Contractors as of August 2016

Direct Service Providers
1. 24 Hour Oakland Parent-Teacher
2. Ala-Costa Center
3. Alameda Unified School District
4. Albany City Unified School District
5. Bay Area Hispano Institute for Advancement
6. Berkeley Unified School District
7. CAPE, Inc.
8. Castro Valley Unified School District
9. Chabot-Las Positas Community College
10. City of Emeryville
11. City of Oakland
12. Davis Street Community Center, Inc.
13. Emery Unified School District
14. Ephesian Children Center
15. Fremont Unified School District
16. Hayward Unified School District
17. Kidango, Inc.
18. Livermore Valley Joint Unified School District
19. New Haven Unified School District
20. Oakland Unified School District
21. Peralta Community College
22. Regents of the UC-UC Berkeley
23. San Lorenzo Unified School District
24. Seneca Family of Agencies
25. St. Mary's Center
26. St. Vincent's Day Home
27. Supporting Future Growth CDC
28. The ARC of Alameda County
29. The Salvation Army
30. Spanish Speaking Unity Council
31. YMCA of the Central Bay Area
32. YMCA of the East Bay
Alternative Payment Agencies That Have Signed Pilot Participation Agreements:
1. Alameda County Social Services Agency
2. BANANAS, Inc.
3. Community Child Care Coordinating Council of Alameda County
4. Child Care Links
5. Child, Family and Community Services, Inc.
6. Davis Street Community Center, Inc.
Declined
None
Relinquished
None

4 EVALUATION PLAN

Each year the County of Alameda will prepare an annual report on the process of the pilot project for submission to EESD. Each annual report will be submitted in November and will reflect on the previous fiscal year. The first evaluation report will be submitted by November 31st 2017 and will cover fiscal year 2016/2017. These annual reports will provide four types of information. First, they will document the implementation of the pilot, both for the County itself and to assist the state and other counties in considering the implementation of similar changes. Second, they will provide the results to date on each of the outcome measures listed below. Third, they will track conditions in the County, comparing Alameda to elsewhere in the state as appropriate, to provide a context for the pilot's progress. Finally, they will identify any modifications in the pilot plan based on the previous year's experiences.

The Pilot established several evaluation goals outlined below. Each goal has a corresponding measure to track the success of the Pilot. Data for the Pilot evaluation will come from three sources of contractor-provided data and will be collected annually:

1) **Census:** Each year participating Pilot contractors will provide an extract of their April 801A data. This provides a point in time snapshot of children receiving care in the County including demographic information.
2) **Attendance and Fiscal Reports:** Contractors will provide Mission Analytics with a copy of 4th Quarter Attendance and Fiscal Reports (9500 Forms). This will provide information on earned CDEs and family fees.
3) **Provider Satisfaction Surveys:** Each provider will complete an annual online survey regarding their experiences with the Pilot project. The survey will be developed in collaboration with Alameda County and will examine contractors' experiences both positive and negative, and their perception of the impact of the Pilot on families.

In addition to the data collected by contractors, EESD will provide the evaluator with two pieces of data each year: the number of participating Title V contractors in neighboring counties and a year-end spreadsheet with contracted Maximum Reimbursement Amounts (MRAs) for each contractor by contract type.

Alameda County will track an outcome measure to match each of the goals for the individualized local child care subsidy plan described in the introduction. In this section, we review each of these goals and describe associated outcome measures. For each outcome measure, we provide a definition of the measure that will be used to guide its calculation and describe the data source or

data collection plan.

Goal 1: Increase the retention of Alameda County center-based child care contractors.

Measure 1: The number of active direct services child care and development services contractors in Alameda County. This measure is defined as the number of direct service contractors providing contracted child care and development services on June 30th of each year. For comparison, we also obtained data from EESD on retention of direct service contractors in nearby counties over the same time period.

Data Source: Report from EESD on the number of active contractors in Alameda County and comparison counties. Alameda County currently has 32 center-based contractors and five Alternative Payment contractors.

Goal 2: Increase the ability of low-income families to move toward self-sufficiency through higher earnings.

Measure 2: The number of children still eligible at recertification due to the Pilot income threshold. This measure is defined as the number of children in April of each year who continue to be eligible for subsidized child care services because of the increased Pilot income threshold. These are children who, without the Pilot, would not be eligible for subsidized child care.

Data Source: April 801A data provided by contractors

Goal 3: Increase the stability of care placements for families.

Measure 3: The number of children at risk of incoming out who are still in care the following year. This measure is defined as: among children who were served in subsidized direct service slots at participating contractors and whose families had income at or above 65 percent of SMI at their last recertification, the share that were receiving services in Alameda County 12 months later. For the purposes of this measure, we exclude children who were expected to start kindergarten or age out of the state subsidy program.

Data Source: April 801A data provided by contractors

Goal 4: Increase the aggregate child days of enrollment in subsidized care in Alameda County.

Measure 4: The aggregate adjusted child days of enrollment among Pilot contractors. The legislation requires that the Pilot achieve an increase in child days of enrollment compared to the

baseline number. For Alameda County, the baseline is the earned child days of enrollment among participating contractors in Fiscal Year 2014/2015. For Alameda County, the baseline is the earned child days of enrollment among participating contractors in Fiscal Year 2014/2015.

Since two contractors operate in multiple counties, we plan only use CDEs in Alameda slots.

This component was included to ensure that the Pilot Reimbursement Rate did not improve payments to contractors by reducing enrollment. Each year the evaluator will re-calculate the baseline days of enrollment based on data provided by EESD to adjust for fluctuations in contract funds. Thus, the baseline is a formula rather than a static number. For example, if contract funds were reduced in a year of the Pilot to 85 percent of the baseline contract funds, the baseline goal for that year would be calculated at 85 percent of the baseline CDE. This strategy is in use in San Mateo and San Francisco Counties and was proposed by EESD staff to offset increases or decreases in funding provided to contractors.

Data Source: 4th Quarter Attendance and Fiscal Forms.

Goal 5: Maximize the take-up of Alameda County's child care and child development subsidy allocations.

Measure 5: The amount of unearned direct service contract funds returned to the California Department of Education. This measure is defined as the total contract allocations during a fiscal year that are unearned (not spent). The amount of unearned contract dollars is defined as the difference between the total contract allocations and the total dollars earned by participating contractors.

Data Source: 4th Quarter Attendance and Fiscal Forms

In addition to evaluation measures, we will include relevant information on provider perspectives from the annual survey and will include an appendix with demographic information from the 801A to provide the Pilot with demographics for the children in care. Demographic tables will include the following for each evaluation year of the Pilot:

- Number of children receiving subsidized care by contract type

[9] Two contractors in the Pilot had multi-county contracts. For these contractors, we used the percentage of their contract that served children in Alameda County to set a baseline.

- Reasons for receiving services
- Length of child participation
- Race/Ethnicity of children
- Age of children
- Family income
- Children receiving part-time care
- Families receiving Temporary Assistance to Needy Families (TANF)

In addition to providing information on the implementation and evaluation of the Pilot in Alameda, the implementation report will identify strategies or innovations that may be implemented statewide.

APPENDIX A: STATE AND PILOT FAMILY FEE SCHEDULE

In this combined state/Pilot family fee schedule the state range is shaded in white and yellow and the Pilot range is shaded blue. The Pilot range here is between 75% of 2005 SMI determined by the California Department of Finance (CA DOF) and 85% of 2010/2011 SMI from the United States Department of Health and Human Services (US DHHS).

Family Fee Schedule									
Monthly Part-time Fee	Monthly Full-time Fee	Family Size 1 or 2	Family Size 3	Family Size 4	Family Size 5	Family Size 6	Family Size 7	Family Size 8 or more	
$ 21.00	$ 42.00	1,820	1,950	2,167	2,513	2,860	2,925	2,990	All counties
$ 27.00	$ 53.00	1,893	2,028	2,253	2,614	2,974	3,042	3,109	
$ 32.00	$ 63.00	1,965	2,106	2,340	2,714	3,089	3,159	3,229	
$ 37.00	$ 74.00	2,038	2,184	2,426	2,815	3,203	3,276	3,349	
$ 42.00	$ 84.00	2,111	2,262	2,513	2,915	3,317	3,393	3,468	
$ 48.00	$ 95.00	2,184	2,340	2,600	3,016	3,432	3,510	3,588	
$ 56.00	$ 111.00	2,257	2,418	2,686	3,116	3,546	3,627	3,707	
$ 64.00	$ 128.00	2,329	2,496	2,773	3,217	3,661	3,744	3,827	
$ 73.00	$ 145.00	2,402	2,574	2,860	3,317	3,775	3,861	3,946	
$ 81.00	$ 162.00	2,475	2,652	2,946	3,418	3,889	3,978	4,066	
$ 90.00	$ 179.00	2,548	2,730	3,033	3,518	4,004	4,095	4,186	
$ 98.00	$ 195.00	2,621	2,808	3,120	3,619	4,118	4,212	4,305	
$ 106.00	$ 212.00	2,693	2,886	3,206	3,719	4,232	4,329	4,425	
$ 115.00	$ 229.00	2,766	2,964	3,293	3,820	4,347	4,446	4,544	
$ 123.00	$ 246.00	2,839	3,042	3,380	3,920	4,461	4,563	4,664	
$ 132.00	$ 263.00	2,912	3,120	3,466	4,021	4,576	4,680	4,784	
$ 140.00	$ 279.00	2,985	3,198	3,553	4,122	4,690	4,797	4,903	
$ 148.00	$ 296.00	3,057	3,276	3,640	4,222	4,804	4,914	5,023	
$ 157.00	$ 313.00	3,130	3,354	3,726	4,323	4,919	5,031	5,142	
$ 160.00	$ 319.00	3,203	3,374	3,749	4,348	4,948	5,061	5,173	
$ 163.00	$ 326.00	**3,283**	3,393	3,770	4,373	4,976	5,089	5,202	
$ 166.00	$ 332.00	3,356	3,413	3,792	4,399	5,006	5,120	5,233	
$ 169.00	$ 338.00	3,386	3,432	3,813	4,423	5,033	5,148	5,262	
$ 173.00	$ 345.00	3,400	**3,518**	3,835	4,448	5,062	5,177	5,292	
$ 177.00	$ 354.00	3,500	3,596	3,856	4,473	5,090	5,206	5,322	
$ 181.00	$ 362.00	3,613	3,628	3,880	4,500	5,121	5,237	5,354	
$ 187.00	$ 373.00	3,730	3,861	**3,908**	**4,534**	**5,159**	**5,276**	**5,394**	
$ 193.00	$ 386.00	**3,839**	3,954	3,995	4,635	5,273	5,393	5,514	Only Pilot Counties
$ 199.00	$ 398.00		4,000	4,031	4,676	5,321	5,442	5,563	
$ 206.00	$ 412.00		4,138	4,290	4,963	5,459	5,583	5,707	
$ 211.00	$ 422.00		4,231	4,393	5,069	5,636	5,754	5,873	
$ 215.00	$ 430.00		4,323	4,495	5,175	5,744	5,855	5,968	
$ 222.00	$ 444.00		4,463	4,598	5,281	5,853	5,956	6,062	
$ 233.00	$ 466.00		4,660	4,701	5,387	5,961	6,056	6,157	
$ 240.00	$ 480.00		**4,742**	4,803	5,493	6,070	6,157	6,251	
$ 245.00	$ 490.00			4,906	5,598	6,178	6,258	6,345	
$ 250.00	$ 500.00			5,009	5,704	6,286	6,359	6,440	
$ 265.00	$ 530.00			5,314	5,810	6,395	6,459	6,534	
$ 286.00	$ 572.00			**5,646**	6,100	6,503	6,560	6,629	
$ 300.00	$ 600.00				6,164	6,612	6,661	6,723	
$ 320.00	$ 640.00				6,400	6,708	6,762	6,818	
$ 330.00	$ 660.00				**6,549**	6,800	6,912	6,950	
$ 340.00	$ 680.00					7,014	7,173	7,200	
$350.00	$ 700.00					7,200	7,332	7,430	
$360.00	$720.00					**7,452**	7,560	7, 621	
$370.00	$740.00						**7,621**	**7,791**	
State Monthly Income Ceilings		**3,283**	**3,518**	**3,908**	**4,534**	**5,159**	**5,276**	**5,394**	
Pilot Monthly (85%) Income Ceilings		**3,839**	**4,742**	**5,646**	**6,549**	**7,452**	**7,621**	**7,791**	

APPENDIX B: 24 MONTH ELIGIBILITY POLICY PROPOSAL

The only events that would trigger a re-determination of eligibility would be: (1) if it benefits the family (i.e. lowering their family fee); (2) if the family's income exceeds the maximum allowable by federal law; or (3) if the family qualifies because of job search. For job search, the eligibility period would be 12 months.

RESPONSES TO CDE QUESTIONS:

1. **How will this change be communicated to families? Please provide sample letters, notifications, etc.**
   Response:
   We will develop a notification in writing and provide to all families, either at the time of enrollment (new families) or at the time of eligibility redetermination (current families). This document would come from the Alameda County ECE Planning Council and would be distributed by all participating contractors. The document would cover all major changes generated by the pilot, including the new income ceiling, the new family fee schedule, 24 month eligibility and 12 month job search.

   In addition, there will be a separate sheet with clear guidelines for the maximum income cutoff that would prompt the family to contact the agency. The family would be required to sign this form acknowledging the income cutoff, and, if they do not comply, they face penalties.

   After the pilot is approved, whenever a family would normally come in for a redetermination of eligibility, their 24 month eligibility clock would start.

2. **The word eligibility is used above, do you also mean need?**
   Yes, we mean both eligibility and need. Or, if a family no longer has a need, they would still be eligible. This is like a Head Start policy; they don't determine eligibility or need after the initial determination.

3. **What would the terms be of families reporting any changes, including need, to the agency?**
   The reasons that would trigger a redetermination of eligibility would be:
   A. If the family requests it.

1. Example 1: if the family's income is reduced and they want their family fee reduced;
2. Example 2: if the family work hours increase and they need more care. In this case the family fee may need to be recalculated and may be increased.

B. If the family's income exceeds the maximum allowed by the federal government, which is 85% of state median income. If the family is over-income, they will receive a notice of action and their care would be terminated within 19 days.
C. All other regular noncompliance issues still apply and families can be terminated for nonpayment of fees, other fraud, etc.
D. If a family or a child changes agencies, they must reapply to the new agency and show eligibility documentation.

4. **Also, clarification is requested as to what your plan will say about the frequency of family fee assessments**.
We would reassess family fees every 24 months, or more frequently if the family requests a redetermination of their eligibility. See #3 above.

5. **What is the frequency of recertification?**
The frequency of recertification would be once every 24 months. Job search would be 12 months.

The family will receive 12 months of job search, and the Pilot will require a check-in at six months. When a family first qualifies, they are given a consistent form (similar to one provided by the Employment Development Department) that allows them to document their job search. At the six month check-in, the caseworker reviews the document with the family, and if the family is still engaged in job search, the family automatically receives six more months of eligibility. The agency also provides the family with a document (already under development) listing job search resources. After the second six month period, if the family does not have any other need (E.g. starting school, beginning employment), then the family is no longer eligible for services. The Pilot will develop standardized forms for check-in at six months.

6. **What are your policies for what to do if/when the basis of need changes (both temporary and long-term), when the child ages out at 13 years, or the family exceeds the income ceilings.**
There will be no change if their need changes. If the child ages out the current policy applies; the family is sent a Notice of Action that their care would be terminated in the next 19 days or until the end of the fiscal year whichever is longer. For students with a documented disability they can remain eligible past age 13.

APPENDIX C: ASSEMBLY BILL 833

Assembly Bill No. 833

CHAPTER 563

An act to add and repeal Article 15.3 (commencing with Section 8340) of Chapter 2 of Part 6 of Division 1 of Title 1 of the Education Code, relating to child care and development services.

[Approved by Governor October 7, 2015. Filed with Secretary of State October 7, 2015.]

LEGISLATIVE COUNSEL'S DIGEST

AB 833, Bonta. Child care and development services: individualized county child care subsidy plan: County of Alameda.

The Child Care and Development Services Act has a purpose of providing a comprehensive, coordinated, and cost-effective system of child care and development services for children from infancy to 13 years of age and their parents, including a full range of supervision, health, and support services through full- and part-time programs. Existing law requires the Superintendent of Public Instruction to develop standards for the implementation of quality child care programs. Existing law authorizes the County of San Mateo, as a pilot project, to develop an individualized county child care subsidy plan, as provided.

This bill would authorize, until January 1, 2021, the County of Alameda to develop an individualized county child care subsidy plan, as specified. The bill would require the plan to be submitted to the local planning council and the Alameda County Board of Supervisors for approval, as specified. The bill would require the Early Education and Support Division of the State Department of Education to review and approve or disapprove the plan and any subsequent modifications to the plan. The bill would require the County of Alameda to annually prepare and submit to the Legislature, the State Department of Social Services, and the State Department of Education a report that contains specified information relating to the success of the county's plan.

This bill would make legislative findings and declarations as to the necessity of a special statute for the County of Alameda.

The people of the State of California do enact as follows:

SECTION 1. It is the intent of the Legislature to build a stable, comprehensive, and adequately funded high-quality early learning and educational support system for children from birth to five years of age, inclusive, with alignment and integration into the K–12 education system by strategically using state and federal funds, and engaging all early care

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and education stakeholders, including K–12 education stakeholders, in an effort to provide access to affordable, high-quality services supported by adequate rates, integrated data systems, and a strong infrastructure that supports children and the educators that serve them.

SEC. 2. Article 15.3 (commencing with Section 8340) is added to Chapter 2 of Part 6 of Division 1 of Title 1 of the Education Code, to read:

Article 15.3. Individualized County of Alameda Child Care Subsidy Plan

8340. The County of Alameda may, as a pilot project, develop and implement an individualized county child care subsidy plan. The plan shall ensure that child care subsidies received by the County of Alameda are used to address local needs, conditions, and priorities of working families in the community.

8340.1. For purposes of this article, "county" means the County of Alameda.

8340.2. (a) For purposes of this article, "plan" means an individualized county child care subsidy plan developed and approved under the pilot project described in Section 8340, which includes all of the following:

(1) An assessment to identify the county's goal for its subsidized child care system. The assessment shall examine whether the current structure of subsidized child care funding adequately supports working families in the county and whether the county's child care goals coincide with the state's requirements for funding, eligibility, priority, and reimbursement. The assessment shall also identify barriers in the state's child care subsidy system that inhibit the county from meeting its child care goals. In conducting the assessment, the county shall consider all of the following:

(A) The general demographics of families who are in need of child care, including employment, income, language, ethnic, and family composition.

(B) The current supply of available subsidized child care.

(C) The level of need for various types of subsidized child care services, including, but not limited to, infant care, after-hours care, and care for children with exceptional needs.

(D) The county's self-sufficiency income level.

(E) Income eligibility levels for subsidized child care.

(F) Family fees.

(G) The cost of providing child care.

(H) The regional market rates, as established by the department, for different types of child care.

(I) The standard reimbursement rate or state per diem for centers operating under contracts with the department.

(J) Trends in the county's unemployment rate and housing affordability index.

(2) (A) Development of a local policy to eliminate state-imposed regulatory barriers to the county's achievement of its desired outcomes for subsidized child care.

(B) The local policy shall do all of the following:

(i) Prioritize lowest income families first.

(ii) Follow the family fee schedule established pursuant to Section 8273 for those families that are income eligible, as defined by Section 8263.1.

(iii) Meet local goals that are consistent with the state's child care goals.

(iv) Identify existing policies that would be affected by the county's plan.

(v) (I) Authorize an agency that provides child care and development services in the county through a contract with the department and either provides direct services or contracts with licensed providers or centers to apply to the department to amend existing contracts in order to benefit from the local policy.

(II) The department shall approve an application to amend an existing contract if the plan is modified pursuant to Section 8340.3.

(III) The contract of a department contractor who does not elect to request an amendment to its contract remains operative and enforceable.

(C) The local policy may supersede state law concerning child care subsidy programs with regard only to the following factors:

(i) Eligibility criteria, including, but not limited to, age, family size, time limits, income level, inclusion of former and current CalWORKs participants, and special needs considerations, except that the local policy shall not deny or reduce eligibility of a family that qualifies for child care pursuant to Section 8353. Under the local policy, a family that qualifies for child care pursuant to Section 8354 shall be treated for purposes of eligibility and fees in the same manner as a family that qualifies for subsidized child care on another basis pursuant to the local policy.

(ii) Fees, including, but not limited to, family fees, sliding scale fees, and copayments for those families that are not income eligible, as defined by Section 8263.1.

(iii) Reimbursement rates.

(iv) Methods of maximizing the efficient use of subsidy funds, including, but not limited to, multiyear contracting with the department for center-based child care, and interagency agreements that allow for flexible and temporary transfer of funds among agencies.

(3) Recognition that all funding sources utilized by direct service contractors that provide child care and development services in the county and contractors that contract with licensed providers and centers are eligible to be included in the county's plan.

(4) Establishment of measurable outcomes to evaluate the success of the plan to achieve the county's child care goals, and to overcome any barriers identified in the state's child care subsidy system.

(b) Nothing in this section shall be construed to permit the county to change the regional market rate survey results for the county.

8340.3. (a) The plan shall be submitted to the local planning council, as defined in subdivision (g) of Section 8499, for approval. Upon approval of the plan by the local planning council, the Board of Supervisors of the County of Alameda shall hold at least one public hearing on the plan. Following the hearing, if the board votes in favor of the plan, the plan shall

be submitted to the Early Education and Support Division of the department for review.

(b) Within 30 days of receiving the plan, the Early Education and Support Division shall review and either approve or disapprove the plan.

(c) Within 30 days of receiving a modification to the plan, the Early Education and Support Division shall review and either approve or disapprove that modification to the plan.

(d) The Early Education and Support Division may disapprove only those portions of modifications to the plan that are not in conformance with this article or that are in conflict with federal law.

8340.4. The county shall, by the end of the first fiscal year of operation under the approved child care subsidy plan, demonstrate, in the report required pursuant to Section 8340.5, an increase in the aggregate days a child is enrolled in child care in the county as compared to the enrollment in the final quarter of the 2014–2015 fiscal year.

8340.5. (a) The county shall annually prepare and submit to the Legislature, the State Department of Social Services, and the department a report that summarizes the success of the county's plan, and the county's ability to maximize the use of funds and to improve and stabilize child care in the county.

(b) A report to be submitted pursuant to subdivision (a) shall be submitted in compliance with Section 9795 of the Government Code.

8340.6. A participating contractor shall receive an increase or decrease in funding that the contractor would have received if the contractor had not participated in the plan.

8340.7. This article shall remain in effect only until January 1, 2021, and as of that date is repealed, unless a later enacted statute, that is enacted before January 1, 2021, deletes or extends that date.

SEC. 3. The Legislature finds and declares that a special law is necessary and that a general law cannot be made applicable within the meaning of Section 16 of Article IV of the California Constitution because of the unique circumstances in the County of Alameda. Existing law does not reflect the fiscal reality of living in the County of Alameda, a high-cost county where the cost of living is well beyond the state median level, resulting in reduced access to quality child care. In recognition of the unintended consequences of living in a high-cost county, this act is necessary to provide children and families in the County of Alameda proper access to child care through an individualized county child care subsidy plan.

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APPENDIX D: MEMORANDUM 1

2016 Steering Committee:
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Margaret Bartelt
Amapola Beenn
Tracey Black
Leah Branson
Alexandra Caraballo
Jenna Churchman
Franca Cioria
Kim Di Giacomo
Mary Anne Doan
Clarissa Doutherd
Relena D. Ellis
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Carlota Escarez
Carmen Gonzalez
Renee Herzfeld, Chair Elect
Margaret Jerene
Judy Kriege
Laura McNair
Jean Monroe
Melanie Mueller
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ALAMEDA COUNTY
Early Care & Education Planning Council

DATE: February 15, 2016
TO: Marguerite Ries, Early Education and Support Division, CA Department of Education
FROM: Angie Garling, ECE Program Administrator, Alameda County General Services Agency
RE: AB 833 Alameda County Pilot Update and Request

We are pleased to report that we have been making progress towards our goal of implementing the AB833 pilot this year.

Needs Assessment and Plan Development:
So far we have begun the process of writing the needs assessment and developing the plan. We expect to have the plan approved by the Planning Council on Friday March 18, 2016. We will schedule the pilot to be approved by the Board of Supervisors in late March, and we hope to have the approved plan to you soon afterwards.

Agency Participation in the Pilot:
So far we have met with the following agencies to explain the pilot and ask for their participation:

1. 24 Hour
2. Albany Unified School District
3. BANANAS, Inc.
4. Bay Area Hispano Institute for Advancement*
5. Berkeley Unified School District
6. CAPE, Inc.
7. Castro Valley Unified School District
8. Chabot-Las Positas Community College
9. Child Care Links
10. Child, Family and Community Services*
11. City of Emeryville
12. City of Oakland
13. 4C's of Alameda County
14. Community Family Services, Inc.
15. Emery Unified School District*
16. Fremont Unified School District*
17. Hayward Unified School District
18. Kidango, Inc.
19. Livermore Valley Joint USD**
20. New Haven Unified School District**
21. Oakland Unified School District
22. Peralta Community College

23. Regents of the UC-UC Berkeley
24. San Lorenzo Unified School District**
25. St. Mary's Center
26. St. Vincent's Day Home
27. The Salvation Army
28. YMCA of the Central Bay Area*
29. YMCA of the East Bay*

*Signed Agreement on file
**Met with subcontractor

We expect to meet with the following agencies within the next month:

1. Ala-Costa
2. Alameda County Social Services Agency
3. Alameda Unified School District
4. Davis Street
5. Ephesians Children Center
6. Seneca Family of Agencies
7. Supporting Future Growth CDC
8. The ARC of Alameda County

All agencies have shown interest in the pilot and our goal is to have a decision about their participation in the pilot by the end of March. Some agencies with publically elected boards may take longer to have the agreements signed.

Questions about the Pilot from Contractors:

The following questions have been raised by various contractors and we would like to get clarification ASAP from EESD:

1. Agencies have families that they are already disenrolling or not re-enrolling due to the pre-pilot SMI cutoff. Can agencies keep those families on in anticipation of the pilot being approved? If so, what date can they begin doing this?
2. After the pilot ends, does an agency get their pre-pilot contract terms (i.e. SRR, Child Days of Enrollment) back?
3. Do the elements of the pilot (new family fee schedule and income cutoff) apply to Stage 1 funds as well?
4. Our state preschool agencies that serve children for two years require them to submit a new application for their second year. Can we consider those families returning families and therefore allow them to be served at the new SMI cutoff and family fee schedule?
5. At least one of our agencies had funds from their contract reduced last year (FY 14-15). Can we use those funds for the pilot?
6. Can high-rate districts retroactively receive the previous two 5% SRR increases from FY 13-14 and 14-15?

APPENDIX E: MEMORANDUM 2

2015 Steering Committee:
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Tracey Black
Alexandra Caraballo
Jenna Churchman
Franca Cioria
Kim Di Giacomo
Mary Anne Doan
Clarissa Doutherd
Relena D. Ellis
Diana Engel
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Carmen Gonzalez
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Marva Lyons
Laura McNair
Jean Monroe
Susan Morris
Melanie Mueller
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ALAMEDA COUNTY
Early Care & Education Planning Council

DATE: March 1, 2016
TO: Marguerite Ries, Early Education and Support Division, CA Department of Education
FROM: Angie Garling, ECE Program Administrator, Alameda County General Services Agency
RE: Update #2, March 2016, AB833 Alameda County Child Care Subsidy Pilot

We have some additional updates and request since my last memo on February 15.

First, we have met with four of eight remaining agencies: Alameda Unified, Ephesians, Supporting Future Growth and Davis Street. We expect to meet with the remaining four before the end of March. We have also received signed agreements from St. Mary's, Peralta, BANANAS Inc., Child Care Links, and 4C's of Alameda County.

Also, we would like to know if we can include the following additional items in the pilot plan:

1. Can we allow children who attend school-age Title V programs run by school-districts to intermingle with children from ASES-funded or district-funded programs on the same school campus? Berkeley Unified School District administrators and parents in particular are very concerned about what they perceive to be segregated programs, where children from the same elementary school classrooms are not allowed to interact with each other because of funding systems.

2. Can we establish a base program for children served by CCTR contracts just like we do for CSPP? This would provide continuity of care which is so important for infants and toddlers.

3. Can we pilot either 12 month eligibility for families, or once per age grouping eligibility? For example, one eligibility determination for infants and toddlers, one for preschoolers and once every other year for school age children?

Finally, both SEIU and AFSCME are interested in exploring ways to raise the reimbursement rates for vouchers providers, especially family child care providers. I am arranging a meeting with them and with our five local alternative payment providers in the coming weeks, but it is unclear to me what flexibility we have under the pilot to achieve this goal. Any information or advice you can provide in advance of our meeting would be appreciated.

Please let me know your response at your earliest convenience. Thank you.

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APPENDIX F: DEPARTMENT OF EDUCATION RESPONSE

CALIFORNIA
DEPARTMENT OF
EDUCATION

TOM TORLAKSON
STATE SUPERINTENDENT OF PUBLIC INSTRUCTION

March 29, 2016

Angie Garling, ECE Program Administrator
Alameda County General Services Agency
1401 Lakeside Drive, #1116
Oakland, CA 94612

Dear Ms. Garling:

Subject: Responses to February 15, 2016 and March 1, 2016 update letters

February 15, 2016 letter
Question 1: *Agencies have families that they are already disenrolling or not re-enrolling due to the pre-pilot SMI cutoff. Can agencies keep those families on in anticipation of the pilot being approved? If so, what date can they begin doing this?*

Response:
Nothing within the county shall change until the pilot plan has been approved by the CDE. The CDE requests that agencies within Alameda County that plan to participate in the pilot do not modify their practice until the plan is approved.

Question 2: *After the pilot ends, does an agency get their pre-pilot contract terms (i.e. SRR, Child Days of Enrollment) back?*

Response:
There are several different options/scenarios in which a pilot may end.

- A contractor may opt out of the pilot while the greater pilot continues. In this instance, the contractor would return to the terms of other agencies across the state.

- The entire pilot sunsets and all contractors within the county would return to the terms of other agencies across the state.
- The entire pilot sunsets and the Legislature grants authority for the terms of the pilot to continue (i.e. the pilot would become permanent). This would require Legislation.

Question 3: *Do the elements of the pilot (new family fee schedule and income cutoff) apply to Stage 1 funds as well?*

Response: No.
Question 4: *Our state preschool agencies that serve children for two years require them to submit a new application for their second year. Can we consider those families returning families and therefore allow them to be served at the new SMI cutoff and family fee schedule?*

Response: Since part-day/part-year services are typically limited to 175-180 days, families whose 3 year-old child(ren) are returning as 4-year olds would need to reapply. This can be done up to 120 prior to the start of the new program year. These children could receive priority enrollment as returning 4-year as long as the family remained eligible for services. Additionally, in accordance with *Education Code* (EC) 8235 part-day/part-year California State Preschool (CSPP) may provide services to children and families whose income is no more than 15% above the income eligibility threshold, this would be whatever threshold is in place when the family is enrolled (no more than 10% of families enrolled in CSPP can be above income threshold). In response to the second part of the questions regarding using the new family fee schedule, fees do not apply to families receiving part-day/part-year services.

Question 5: *At least one of our agencies had funds from their contract reduced last year (FY 14-15). Can we use those funds for the pilot?*

Response: No.

Question 6: *Can high-rate districts retroactively receive the previous two 5% SRR increases from FY 13-14 and 14-15?*

Response:
No. Consistent with CDE policy, contractors who have a reimbursement rate that exceeds the standard reimbursement rate (SRR) are exempt from rate increases, to the extent such a rate increase will cause the agency's rate to exceed the pilot rate (i.e. if after the cost-of-living adjustment has been applied, the high-rate district's rate is less

than the new SRR, the CDE will increase the district's rate to the SRR; otherwise, the agency will receive no increase to its reimbursement rate)

Question 7: *When agencies identify funding in their contract to allocate to the pilot, who do they address their letter to? Margo Hunkins and Lisa York? Someone else? Is VTT-type wording acceptable?*

Response:
These requests should be sent to Marguerite Ries, Administrator, Policy Office, Early Education and Support Division, 3410 N Street, Sacramento, CA 95814. These requests should also be sent to Margo Hunkins, Consultant, Early Education and Support Division, Suite 3410, 1430 N Street, Sacramento, CA 95814.

Letters submitted by Alameda Pilot contractors for transferring funds (accepting or contributing) can certainly mirror those used to effect Voluntary, Temporary Transfers (VTT). As with the VTT letters, the letter must indicate the contract they wish to transfer funds from or to, the current contract amount, the amount of the transfer, the post-transfer contract amount, and the agency's authorized representative's signature.

Question 8: *We know that agencies can do external transfers throughout the year under the pilot. Can agencies also do internal transfers throughout the year under the pilot?*

Response:
To clarify terminology, we will refer to external transfers as interagency transfers [e.g. Voluntary and Temporary Transfer (VTT)] and internal transfers as intra-agency transfers [e.g. Center-based Child Care (CCTR)/CSPP)]. The CDE processes external and internal transfers at different points of the year. For internal transfers, the CDE accepts requests between January 1-15 and May 1-15; for external transfers, the CDE accepts requests between November 1-15 and May 1-15. However, transfers initiated by the pilot can be requested outside these periods under limited circumstances.

Question 9: *Can agencies who have only a CSPP contract use some of their money to create a CCTR contract as part of the internal or external transfer process?*

Response:
No. Per *EC* Section 8340.2 (a)(2)(C)(iv) allows for "…flexible and temporary transfer of funds among agencies." An existing CSPP contractor creating a new CCTR contract is not considered to be a "temporary transfer" of funds.

Question 10: *How does the audit requirement affect transfers made throughout the year? Some of our agencies haven't yet received their VTT funds from 14-15 because their audit hasn't been reviewed. This creates a hardship for agencies*.

Response:
The audit requirement has the same impact for pilot contractors as non-pilot contractors. To prevent any delays to a contractor's reimbursement directly related to a transfer, the CDE recommends expeditious transmittal of all transfer documents to the CDE as well as a local policy that implements timeframes intended to prevent delays in payment due to audit requirements. As an additional measure to prevent delays in payment, the CDE recommends contractors sign and return any contract amendments related to VTTs as soon as possible, particularly those amendments that reduce a contract's maximum reimbursable amount. The office of Child Development & Nutrition Fiscal Services is available to discuss further any questions the pilot has about these responses.

"Potential Elements of the Plan" response: The comments below only address the items of concern.
3. *Restore AP agencies admin rate to 20.80%:* Currently, Alternative Payment agencies "admin rate" includes a cap on the admin rate of 15% and a support services rate of 2.5%. The cap on the admin rate of 15% is dictated by federal law and any component of a pilot may not supersede federal law. *EC* Section 8340.2 (a)(2)(C) states that "The local policy may supersede state law with regard only to the following factors:…". State law caps the administrative rate and the local plan cannot supersede state law unless specifically included in *EC* Section 8340.2. Agency administrative rates do not fall under this section.

5*. High-rate districts will increase their reimbursement rate by the same amount as other contractors*: No. Contractors who have a reimbursement rate that exceeds the standard reimbursement rate are exempt from rate increases, to the extent such a rate increase will cause the agency's rate to exceed the pilot rate (i.e. if after the cost-of-living adjustment has been applied, the high-rate district's rate is less than the new SRR, the CDE will increase the district's rate to the SRR; otherwise, the agency will receive no increase to its reimbursement rate).

8. *Allow agencies that have rated a 4 or 5 on our local QRIS to automatically pass certain features of their Contract Monitoring Review*: The EESD and Quality Rating Improvement (QRIS) System currently have a reciprocity agreement that allows the Field Services Office (FSO) to accept Environmental Rating Scale (ERS) ratings conducted by QRIS within 13 months of our Contract Monitoring Review (CMR). In turn

QRIS will accept ERS rating conducted by FSO consultants as part of their CMR review. EESD will continue to work on streamlining and consider areas where QRIS and CMR may consolidate efforts.

March 1, 2016 letter

Question 1: *Can we allow children who attend school-age Title V programs run by school districts to intermingle with children from ASES-funded or district-funded programs on the same school campus? Berkeley Unified School District administrators and parents in particular are very concerned about what they perceive to be segregated programs, where children from the same elementary school classrooms are not allowed to interact with each other because of funding systems.*

Response:
To the best of our knowledge, there is nothing that prevents "Title 5" and ASES-funded or district-funded afterschool programs from operating and allowing children to intermingle on the same school campus. When programs are intermingled, agencies must follow the program requirements (i.e. ratios, staffing requirements) which are the most stringent.

Question 2: *Can we establish a base program for children served by CCTR contracts just like we do for CSPP? This would provide continuity of care which is so important for infants and toddlers.*

Response:
This question was addressed in a phone call between the CDE and representatives from Alameda County on March 11, 2016.

Question 3: *Can we pilot either 12 month eligibility for families, or once per age grouping eligibility? For example, one eligibility determination for infants and toddlers, one for preschoolers and once every other year for school age children?*

Response:
Yes, we believe the request may be made to pilot 12-month eligibility for families. This is aligned with the reauthorization of the Child Care and Development Block Grant Act. However, the CDE requests that in Alameda's Plan proposal the components of 12-month eligibility are explicitly described for the participating contractors within the county related to: eligibility, need, reporting changes to eligibility and need, job search, periods of redetermination, etc.

Question: *Both SEIU and AFSCME are interested in exploring ways to raise the reimbursement rates for vouchers providers, especially family child care providers. I am arranging a meeting with them and with our five local alternative payment providers in the coming weeks, but it is unclear to me what flexibility we have under the pilot to achieve this goal.*

Response:
While the CDE does not believe a pilot plan may modify the methodology of California's market rate surveys, a pilot may request that a greater percentage of the market may be accessed from the market rate survey that is currently implemented/adopted per *Education Code* sections 8357 and 8447.

If you have any questions regarding this subject, please contact Marguerite Ries, Administrator, Early Education and Support Division, Policy Office by phone at

916-445-7349 or by e-mail at mries@cde.ca.gov.

Sincerely,
Marguerite Ries, Administrator
Policy Office, Early Education and Support Division

MR: dr

APPENDIX G: MEMORANDUM 3

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Margaret Bartelt
Amapola Beenn
Tracey Black
Alexandra Caraballo
Jenna Churchman
Franca Cioria
Kim Di Giacomo
Mary Anne Doan
Clarissa Doutherd
Relena D. Ellis
Diana Engel
Carlota Escarez
Carmen Gonzalez
Leah Goldsmith
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Marva Lyons
Laura McNair
Jean Monroe
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Ramil Rivera
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Zina Rosen-Simon
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ALAMEDA COUNTY
Early Care & Education Planning Council

DATE: April 7, 2016
TO: Marguerite Ries, Early Education and Support Division, CA Department of Education
FROM: Angie Garling, ECE Program Administrator, Alameda County General Services Agency
RE: Update #3, April 2016, AB833 Alameda County Child Care Subsidy Pilot

Thank your for your response to our previous memos of February 15 and March 1. We have some updates and clarifications specified below.

We have met with all subsidized ECE agencies operating in Alameda County. Four agencies (Emery, San Lorenzo, New Haven and Livermore Unified) were contacted through their subcontractor. To date 25 agencies have signed Pilot Participation Agreements. We are expecting the remaining 10 agreements to come in soon.

Also the current planned timeline for approval of the pilot is as follows: Approval at the ECE Planning Council meeting April 21, 2016 and approval by the County Board of Supervisors May 10, 2016. We hope to submit the plan for your approval mid-May.

Could you provide a written response to the following question to help identify our level of flexibility in this area? *Can we establish a base program for children served by CCTR contracts just like we do for CSPP? This would provide continuity of care which is so important for infants and toddlers.*

We have the following refined proposals we would like you to review:

Support Services Rate: Can we propose that the Alameda County Alternative Payment Agency support services rate be increased from 2.5% to 4%?

Eligibility Period: Can we propose that there be only one eligibility determination for families at enrollment? Families would only need to recertify if: 1) it was more beneficial for the family (i.e. a reduction in their family fee) or 2) the family income exceeded the federally allowable limit of 85% of the State Median Income? We have confirmed with federal experts that this proposal is in compliance with federal law and draft regulations.

Regional Market Rate: Can we propose that Alameda County Alternative Payment agencies reimburse providers up to 90% of the currently implemented (2009) Regional Market Rate (RMR) survey?

Finally, to help us in our calculations and decisions, we request a copy of the full 2009 RMR survey for Alameda County.

Please let me know your response at your earliest convenience. Thank you.

1 | Page

APPENDIX H: MEMORANDUM 4

2016 Steering Committee:
Rosemary Almand
Mirella Almaraz
Margaret Bartelt
Amapola Beenn
Tracey Black
Leah Branson
Alexandra Caraballo
Jenna Churchman
Franca Cioria
Kim Di Giacomo
Mary Anne Doan
Clarissa Doutherd
Relena D. Ellis
Diana Engel
Carlota Escarez
Carmen Gonzalez
Renee Herzfeld, Chair Elect
Margaret Jerene
Judy Kriege
Laura McNair
Jean Monroe
Melanie Mueller
Ramil Rivera
Sandra Rodriguez
Sandra Taylor
Carol Thompson
Veronica Ufoegbune, Chair

Planning Council Staff:

Neva Bandelow
ECE Quality Manager
LPC Program Coordinator
Phone: 510-208-9722
neva.bandelow@acgov.org

Ellen Dektar
Senior Management Analyst
Phone: 510-208-9578
ellen.dektar@acgov.org

Michael Panori
Support
Phone: 510-208-9620
michael.panori@acgov.org

❖

1401 Lakeside Drive, #1116
Oakland, CA 94612
Phone: 510-208-9620
Fax: 510-208-9579
www.acgov.org/childcare

Alameda County Early Care & Education Planning Council

DATE: April 28, 2016
TO: Marguerite Ries, Early Education and Support Division, CA Department of Education
FROM: Angie Garling, ECE Program Administrator, Alameda County General Services Agency
RE: Update #4, April 28, 2016, AB833 Alameda County Child Care Subsidy Pilot

All but one Alameda County agency has signed a Pilot Participation Agreement. We are close to having all agencies on board!

Also, per our phone conversation on Monday, I'd like to clarify the following requests:

1. Can we include the following proposal in our plan: Families will receive 24 months of eligibility or until the end of the fiscal year, whichever is longer? This would apply to all age children, all types of contracts including AP, CCTR, CSPP, CHAN. The only events that would trigger a re-determination of eligibility would be: 1) if it benefits the family (i.e. lowering their family fee); 2) if the family's income exceeds the maximum allowable by federal law; 3) if the family qualifies because of job search. For job search, the eligibility period would be 12 months.

*Please note that if the question of AP funds is unclear by the time you answer this memo, we would like to know if this policy would be approved for Title V funds.

We believe that if this component of the plan is approved, then our previous question of establishing a core program for infants and toddlers is no longer relevant.

2. Can you provide more explanation of CDE's view that Stage 1 funds cannot be aligned with the pilot, and what would be needed to include Stage 1 funding?

3. If Stage 2 or 3 funds are unearned in the base year like Title V funds, can they be captured to contribute to an increase in the RMR reimbursement?

Thank you. We also understand that you will be providing us with the 2009 RMR survey results for Alameda County, getting back to us on our request to raise the support services rate for APs, and approving the proposed paperwork for agencies to identify funds for the pilot.

--Angie

APPENDIX I: DEPARTMENT OF EDUCATION RESPONSE 2

CALIFORNIA
DEPARTMENT OF
EDUCATION

TOM TORLAKSON
STATE SUPERINTENDENT OF PUBLIC INSTRUCTION

May 11, 2016

Angie Garling, ECE Program Administrator
Alameda County General Services Agency
1401 Lakeside Drive, #1116
Oakland, CA 94612

Dear Ms. Garling:

Subject: Responses to April 7, 2016, and April 28, 2016, letters

Question (April 7 letter):
Can you provide a written response to the following question to help identify our level of flexibility in this area? *Can we establish a base program for children served by Center-based Child Care (CCTR) contracts just like we do for California State Preschool (CSPP)? This would provide continuity of care which is so important for infants and toddlers.*

Response:
Please provide additional clarity related to "establish a base program for children served by CCTR contracts". Are you suggesting to create a part-day and full-day CCTR program like CSPP, with no need criteria for the part-day program?

Question (April 7 letter):
Support Services Rate: Can we propose that Alameda County Alternative Payment Agency support services rate be increased from 2.5 percent to 4 percent?

Response:
Per *Education Code* (*EC*) Section 8223, "The reimbursement for alternative payment programs shall include the cost of child care paid to child care providers plus the administrative and support services costs of the alternative payment program. The total cost for administration and support services shall not exceed an amount equal to 17.5 percent of the total contract amount. The administrative costs shall not exceed the costs allowable for administration under federal requirements." The maximum administrative percentage allowable under federal law is 15 percent. Contractors operating under the pilot in Alameda County may increase their support services rate from 2.5 to 4 percent, however the administration + support services combined rate shall not exceed an amount equal to 17.5 percent of the total contract amount. Administrative and support costs are not included in *EC* Section 8340.2 (a)(2)(C) which lists the factors for which the local policy may supersede state law.

Question (April 7 letter):
Eligibility Period: Can we propose that there be only one eligibility determination for families at enrollment? Families would only need to recertify if: (1) it was more beneficial for the family (i.e. a reduction in their family fee), or (2) the family income exceeded the federally allowable limit of 85 percent of the State Median Income. We have confirmed with federal experts that this proposal is in compliance with the federal law and draft regulations.

Response:
This question was further refined in the letter received by the California Department of Education on April 28, 2016. A response to that question is included below.

Question (April 7 letter):
Regional Market Rate (RMR): Can we propose that Alameda Alternative Payment agencies reimburse providers up to 90 percent of the currently implemented (2009) RMR survey?

Response:
Per *EC* Section 8340.2(a)(2)(B)(v)(I) the local policy shall, "Authorize an agency that provides child care and development services in the county through a contract with the department and either provides direct services or contracts with licensed providers or centers to apply to the department to amend existing contracts in order to benefit from the local policy." Alternative Payment agencies that administer either a CalWORKS Stage 2 (C2AP), CalWORKS Stage 3 (C3AP), Alternative Payment Program (CAPP), or Migrant

Alternative Payment Program (CMAP) do not “provide direct services or contracts with licensed providers or centers”. Therefore, a modification to the RMR for these contract types would not apply. However, family child care networks operating under a Family Childcare Home Education Network (CFCC) contract, that is reimbursed using the RMR, may be eligible to reimburse providers up to 90 percent of the currently implemented (2009) RMR survey.

Question (April 7 letter):
Finally, to help us in our calculations and decisions, we request a copy of the full 2009 RMR survey for Alameda County.

Response:
A copy of the 2009 RMR Survey was forwarded as an attachment to you on May 5, 2016.

Question (April 28 letter):
Can we include the following proposal in our plan: Families will receive 24 months of eligibility or until the end of the fiscal year, whichever is longer? This would apply to all age children, all types of contracts including AP, CCTR, CSPP, Programs for Special Needs Children (CHAN). The only events that would trigger a re-determination of eligibility would be: (1) if it benefits the family (i.e. lowering their family fee); (2) if the family's income exceeds the maximum allowable by federal law; or (3) if the family qualifies because of job search. For job search, the eligibility period would be 12 months.

We believe that if this component of the plan is approved, then our previous question of establishing a core program for infants and toddlers is no longer relevant.

Response:

In concept the California Department of Education (CDE) believes you may propose this change for the following direct-service contract types: CSPP, CCTR, CFCC, CMIG, and CHAN. However, the CDE requests additional clarity and specifics related to this proposal prior to granting formal approval. For example, how will this change be communicated to families? Please provide sample letters, notifications, etc. The word *eligibility* is used above, do you also mean *need*? What would the terms be of families reporting any changes, including need, to the agency?

Also, clarification is requested as to what your plan will say about the frequency of family fee assessments, the frequency of recertification, policies for what to do if/when the basis of

need changes (both temporary and long-term), when the child ages out at 13 years, or the family exceeds the income ceilings.

Question (April 28 letter):
Can you provide more explanation of CDE's view that Stage 1 funds cannot be aligned with the pilot, and what would be needed to include Stage 1 funding?

Response:
The CDE believes that CalWORKS Stage 1 funds cannot be aligned with the pilot for the following two reasons:

1. *EC* Section 8340.2 (a)(2)(B)(v)(I) states (in part) that the local policy shall do the following, "Authorize an agency that provides child care and development services in the county through a contract with the department…" The CDE is the department referenced in this section of the *EC*. CalWORKS Stage 1 funds are administered by county welfare departments, and not the CDE and the CDE does not contract with agencies that administer Stage 1 funds. The *EC* citation above references "…an agency that provides child care through a contract with the department…"

2. *EC* Section 8351 (a) states, "The county welfare department shall manage the first stage during which a family shall receive a child care subsidy for any legal care chosen by the parent. The first stage begins upon the entry of a person into the program prescribed by Chapter 2 (commencing with Section 11200) of Part 3 of Division 9 of the Welfare and Institutions Code." Since the county welfare departments manage the first stage of CalWORKS, and not the CDE, the CDE believes it does not have the authority to approve the inclusion of Stage 1 funding or programmatic flexibility in the local policy or plan.

Question (April 28 letter):
If Stage 2 or 3 funds are unearned in the base year like Title V funds, can they be captured to contribute to an increase in the RMR reimbursement?

Response:
As stated in the previous response related to Alternative Payment agencies utilizing various percentiles of the RMR, since agencies administering either a CalWORKS Stage 2 (C2AP), CalWORKS Stage 3 (C3AP), Alternative Payment Program (CAPP), or Migrant Alternative Payment Program (CMAP) do not "provide direct services or contracts with licensed providers or centers", their funds may not be captured to contribute to an increase in the RMR reimbursement.

In addition, although C2AP, C3AP, CAPP and CMAP contractors receive a contract amount each year, C2AP and C3AP contracts are managed differently under the law. Because Stage 2 is an entitlement program and Stage 3 has historically been treated as one, the funds are not county allocated, but rather a statewide allocation. Throughout the year, the CDE has the authority to move funds from one Stage 2 or Stage 3 contractor to another to ensure the state has adequate funds to cover these programs.

If you have any questions regarding this subject, please contact Marguerite Ries, Administrator, Early Education and Support Division, Policy Office by phone at

916-445-7349 or by e-mail at mries@cde.ca.gov.

Sincerely,

Marguerite Ries, Administrator

Policy Office, Early Education and Support Division

MR: dr

APPENDIX J: DEPARTMENT OF EDUCATION DISMISSAL

CALIFORNIA
DEPARTMENT OF
EDUCATION

TOM TORLAKSON
STATE SUPERINTENDENT OF PUBLIC INSTRUCTION

July 15, 2016

Angie Garling, ECE Program Administrator
Alameda County General Services Agency
1401 Lakeside Drive, Suite1116
Oakland, CA 94612

Dear Ms. Garling:

Subject: Alameda Pilot Program Plan

The California Department of Education (CDE) has reviewed the May 2016 Alameda Pilot Program Plan (Plan). Based on this review, the CDE is disapproving the Plan at this time for the following specific reasons:

1. The Plan states several times throughout that it would apply to "all types of contracts including Center-Based Child Care (CCTR), California State Preschool (CSPP) and Programs for Special Needs Children (CHAN)." Pursuant to *Education Code* section 8340.2 (a)(2)(B)(v)(I) CDE will only approve the Plan for the following contract types : CSPP, CHAN, CCTR, Family Child Care Homes Education Network (CFCC), and Migrant (Center-Based) CMIG.. Please make clarifying changes.

2. The Plan provides for the Pilot Reimbursement Rate (PRR) to be determined when "we receive complete information on the County's under-earning." More specifically, the Plan provides that "Alameda County Pilot Administrators must receive earnings information from contractor attendance and fiscal forms for the baseline year before a final PRR can be established." Alameda County must establish a PRR upfront and include the PRR in this Plan, based on 2015–16 unearned balances, so that the CDE will have the information it needs to determine whether the Plan is consistent with the enabling legislation.

3. In a similar vein, the Plan fails to provide other specific contract terms, including the maximum reimbursable amounts (MRAs) and child days of enrollment (cdes).

4. The Plan provides for contract transfers to be made "between agencies throughout the fiscal year." While contract transfers can be made between agencies throughout the fiscal year, the Plan needs to state that the CDE must

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approve the time periods during which contract transfers can take place and must approve of the transfers.

5. A number of times in the Plan there are references to using funds from "relinquished" contracts for additional resources. All references in the Plan to utilizing relinquished funds need to be removed. Funds that are relinquished by contracting agencies are not the property of other agencies, but rather of the State, which is funding CDE may offer to other agencies through a competitive process.

Prior to approval of any resubmitted Plan, the CDE would like to discuss why you are not seeking to increase the income eligibility threshold for initial enrollment. Also, The CDE would like to know how Alameda County will track enrollment increases to ensure that any increase to cdes is not due to any expansion funding received from the CDE.

We are still happy to meet with you and representatives of the Alameda County General Services Agency and Mission Analytics on July 19 to discuss the plan and answer any questions you may have prior to resubmittal of the Plan.

Thank you for all your services to the community, children, and families of Alameda County.

If you have any questions regarding this subject, please contact David Rude, Education Programs Consultant, Early Education and Support Division, Policy Office by phone at 916-319-0536 or by e-mail at drude@cde.ca.gov.

Sincerely,

Maria Balakshin

Maria Balakshin, Acting Administrator
Policy Office, Early Education and Support Division

MB: dr

CC: Kira Gunther, Mission Analytics

BCC: David Rude, PO, CDE
Elizabeth Stein, Attorney, LAO, CDE
Phyllis Savage, CDNFS, CDE
Stephen Propheter, CDNFS, CDE
Margo Hunkins, Field Services Office (FSO), CDE
Lisa York, CDNFS, CDE

APPENDIX K: PLANNING COUNCIL MEETING MINUTES

ALAMEDA COUNTY EARLY CARE AND EDUCATION PLANNING COUNCIL MEETING MINUTES

July 22, 2016

Steering Committee Members Present: [15]			
Rosemary Almand	Tracey Black	Leah Branson	Jenna Churchman
Mary Anne Doan	Clarissa Doutherd	Relena Ellis	Diana Engel
Carlota Escarez	Renee Herzfeld	Margaret Jerene	Melanie Mueller
Jean Monroe	Sandra Taylor	Veronica Ufoegbune	
Steering Committee Members Absent: [10]			
Margaret Bartelt	Amapola Beenn	Alexandra Caraballo	Franca Cioria
Carmen Gonzalez	Judy Kriege	Laura McNair	Ramil Rivera
Sandra Rodriguez	Carol Thompson		
General Members Present: [5]			
Melinda Martin	ACOE	Leah Bayston	4 Cs Alameda County
Joni Cheintigian	4 Cs Alameda County	Teresa Granczy	San Francisco
Katie Honeggar	4 Cs Alameda County		
Child Care Planning Council Staff Present:			
Angie Garling	Ellen Dektar	Kim Hazard	LaWanda Wesley
Michael Panori			

1. **Call to Order**
   Renee Herzfeld, Council Chair-elect, convened the meeting at 9:15 at the Room L-3, Alameda County Office of Education, 313 W. Winton Ave., Hayward, CA.

   Renee welcomed the participants. Attendees introduced themselves and made announcements.

   Margaret Jerene announced that the Quality Counts Advisory Committee applications were now posted. Completed applications would be due on August 5, 2016.

Neva Bandelow announced that Kim DiGiacomo had needed to resign from the committee because of relocation.

2. **Consent Calendar-Action**

   The minutes from the April 22, 2016 meeting were approved, as well as the 2017 Planning Council Meeting Calendar and the Agenda for the July 22, 2016 meeting. Relena Ellis and Margaret Jerene motioned and seconded for the approval of the agenda. Rosemary Almond and Leah Branson motioned and seconded for the approval of the April minutes and the Planning Council 2017 Calendar.

3. **Planning Council Business: Action Items**

   - Action Item #1:

     Approve the AB833 Alameda County Individualized Child Care Individualized Subsidy Pilot Plan. (Item was recommended by the State Contractors Group).
     The Committee voted to approve this plan unanimously.
     Margaret Jerene motioned and Relena Ellis seconded.

   - Action Item #2:

     Announcement of Planning Council Recruitment for New 2017 Members and for election of 2017
     Planning Council Chair-Elect.
     Nominees Clarissa Doutherd and Melanie Mueller spoke on their qualifications for this position as well as their goals and vision in regard to it.

   - Action Item #3:

     Discussion of Strategic Planning Outcomes and RBA. Ellen Dektar and Renee Herzfeld reviewed the outcomes from the 2016 Strategic Planning Retreat on May 29. (This Item for discussion only.)

4. **Committee Reports (verbal and/or written, time permitting):**

   Melanie Mueller updated the recent activities of the ECE Quality Committee.
   Veronica Ufoegbune reviewed the recent State Contractors Committee meeting and activities.
   Renee Herzfeld commented on the doings of the Executive Committee
   Jenna Churchman and Ellen Dektar updated the group on Public Policy activities

5. **Community and Staff Reports:**
   Ellen Dektar presented a State Budget Update
   Angie Garling and Margaret Jerene presented the QRIS Update: Block Grant and IMPACT
   Clarissa Doutherd presented the Parent Voices update
   Neva Bandelow presented the Coordinator's report and announced that this would be the final Planning Council she would oversee. She has accepted a position at the ACOE. The Planning Council Coordinator duties would pass on to LaWanda Wesley

6. **Presentation:** Planning Council Roles and Mandates (Neva Bandelow)

7. **Public Comment:**
   There was no Public Comment for this specially convened meeting.

Veronica Ufoegbune, Chair of the Early Care & Education Planning Council, adjourned the meeting at 12:10 PM to the September 16, 2016 Planning Council Meeting at 1100 San Leandro Blvd., San Leandro

Respectfully Submitted by Early Care & Education Planning Council Staff.

Adjourned to: Alameda County Early Care and Education Planning Council Special Meeting,
Tuesday, May 10, 2016, 12:30–2:30 p.m., at the Room L-2, Alameda County Office of Education, Hayward

APPENDIX L: MINUTE ORDER

ALAMEDA COUNTY BOARD OF SUPERVISORS
MINUTE ORDER

The following action was taken by the Alameda County Board of Supervisors on 08/02/2016

Approved as Recommended ◉ **Other** ○

Unanimous ☑ **Chan:** ☐ **Haggerty:** ☐ **Miley:** ☐ **Valle:** ☐ **Carson:** ☐ - 5
Vote Key: N=No; A=Abstain; X=Excused

Documents accompanying this matter:

Resolution: R-2016-243

Documents to be signed by Agency/Purchasing Agent:

File No. 29780
Item No. 59

Copies sent to:
Debbie Sullivan QIC 26021

Special Notes:

I certify that the foregoing is a correct copy of a Minute Order adopted by the Board of Supervisors, Alameda County, State of California.

ATTEST:
Clerk of the Board
Board of Supervisors

By: _____
Deputy

APPENDIX M: AB833 INDIVIDUALIZED SUBSIDY PLAN LETTER

AGENDA #_____, August 2, 2016

WILLIE A. HOPKINS, JR., Director

1401 LAKESIDE DRIVE, OAKLAND, CALIFORNIA 94612 510 208 9700 FAX 510 208 9711 WWW.ACGOV.ORG/GSA/

July 25, 2016

Honorable Board of Supervisors
County of Alameda
1221 Oak Street, Suite 536
Oakland, California 94612-4305

Dear Board Members:

SUBJECT: APPROVE THE REVISED ASSEMBLY BILL 833 INDIVIDUALIZED CHILD CARE SUBSIDY PLAN FOR ALAMEDA COUNTY AS REQUIRED BY STATE LAW

RECOMMENDATION:

Adopt a resolution approving the revised Assembly Bill 833 Individualized Child Care Subsidy Pilot Plan for Alameda County.

DISCUSSION/SUMMARY:

For over 25 years, the General Services Agency (GSA) has housed the Alameda County Early Care and Education Program to help meet your Board's commitment to improving the quality and availability of early care and education in Alameda County.

The Early Care and Education Planning Council and Alameda County co-sponsored Assembly Bill 833 (AB833), authored by Assemblyman Rob Bonta and signed by Governor Jerry Brown in October, 2015. The Bill came about after child care providers and other community stakeholders identified specific areas in the child care service delivery system that required modification to accommodate local needs. The pilot is modeled after the successful pilots in San Mateo and San Francisco counties.

Your Board approved the original plan at your June 14, 2016 meeting. The approved plan was then submitted to the California Department of Education (CDE) as required by law. On July 15, 2016 the CDE notified GSA that the plan was not approved. The reasons stated in the July 15 letter are mostly minor technical issues that have been changed in the plan. The State also informed us that we must establish and submit the new Pilot Reimbursement Rate (PRR) as part of the plan. We now have the final numbers from our 37 participating agencies which was needed to calculate the PRR.

Finally, our parent and provider representatives requested the following additional items be included in the revised version of the plan:

1. Raising the entry as well as the exit eligibility income cutoff to family eligibility. Previously, we only requested that the exit level be raised commensurate with the existing San Francisco and San Mateo pilots. The State indicated they would approve this request.

2. Specifically requesting that Alternative Payment agencies participate in certain aspects of the pilot: namely the new higher eligibility cutoff, family fee schedule, 24-month eligibility and homeless prioritization.

3. Restoring age eligibility for State preschool contracts to 2.9 years of age.

4. Treat homeless families or families seeking housing with the same eligibility priority as children at risk of abuse or neglect.

5. Using State funds to waive income limits for up to 10% of children on an agency's preschool or child care contract who have a documented diagnosed disability.

6. Raise the reimbursement rate of the two agencies with the lowest reimbursement rates to the same rate as other contractors.

The Bill authorizes a five-year pilot, giving Alameda County limited authority to create a child care subsidy policy that reflects County needs and circumstances. The pilot allows Alameda County to establish its own rules for child care subsidy in the following specific areas: income eligibility, family fees, provider reimbursement rates, and ways to maximize use of contracted funds.

The Bill does not provide any additional funding other than the existing annual child care subsidy allocations received from the State. It does, however, allow for the use of contractor relinquished under-earned funds to be redistributed among County contractors who are participating in the pilot rather than reverting to the State. Alameda County child care contractors with direct contracts with CDE may "opt-in" as participants in this pilot by requesting the CDE amend their contracts in accordance with the County Child Care Subsidy Plan. At this time, all 37 contracted programs have indicated the desire to participate.

The plan increases the current statewide income eligibility threshold of 75% State Median Income (SMI) to the Federal ceiling of 85% SMI so that more families receiving subsidized child care in the County can strive for self-sufficiency. For a family of four, the income cutoff will move from **$3,908 to $5,646** per month, allowing families to achieve **77% of the 2014 County Median Income - up from 53%.**

The plan also creates an extended family fee schedule, beginning at the current exit level of 75% SMI and increasing up to the new 85% SMI ceiling. The fees are designed to gradually transition families from the maximum fees under State rules to the typical full cost of care in Alameda County.

In order to ensure that fewer children are not served as a result of implementing this pilot, AB833 requires a countywide aggregate increase of child days of enrollment at the end of the first year of operations under the approved plan. The Bill requires evaluation of the child care plan and the pilot. The plan includes five outcome measures based upon the goals of the pilot. Data on these measures will be collected on an ongoing basis and reported annually to the legislature as required.

The Bill requires approval by the Local Early Care and Education Planning Council (revised plan approved July 22, 2016). Once approved by the County Board of Supervisors, the plan must be submitted to the CDE Early Education and Support Division which must either approve or disapprove the plan within 30 days. The Early Education and Support Division may only disapprove those portions of the plan that are not in conformance with AB833 or that are in conflict with Federal law.

FUNDING:

There is no increase in net County costs.

Respectfully submitted,

Willie A. Hopkins, Jr.
Director, General Services Agency

BOS.08.02.16.CHC.Approve Revised AB 833 Individualized Child Care Subsidy Plan.Letter

Attachment

cc: Susan S. Muranishi, County Administrator
Steve Manning, Auditor-Controller
Donna R. Ziegler, County Counsel

APPENDIX N: BOARD OF SUPERVISORS RESOLUTION

RESOLUTION NO. 2016-243

THE BOARD OF SUPERVISORS OF THE COUNTY OF ALAMEDA

RESOLUTION APPROVING COUNTY INDIVIDUALIZED CHILD CARE SUBSIDY PLAN AUTHORIZED BY ASSEMBLY BILL 833, FOR SUBMISSION TO THE CALIFORNIA DEPARTMENT OF EDUCATION, EARLY EDUCATION AND SUPPORT DIVISION

WHEREAS in Alameda County where the cost of living is well beyond the state median and statewide eligibility criteria, reimbursement rates and fund restrictions create a child care subsidy system that does not promote self-sufficiency among the County's neediest families or stability in the County's child care infrastructure; and

WHEREAS after child care providers and community stakeholders in Alameda County identified specific areas in the child care service delivery system that required modification to accommodate local needs, the County of Alameda and the Local Early Care and Education Planning Council co-sponsored AB833, authored by Assemblyman Rob Bonta, and signed by Governor Jerry Brown in October 2015; and

WHEREAS consistent with AB833 Alameda County, with input from early care and education stakeholders has created a five-year pilot child care subsidy plan tailored to meet the needs, conditions, and priorities of Alameda County Families which addresses four distinct areas: eligibility criteria, participant fees, provider reimbursement rates, and other methods of maximizing subsidy funds ("the Alameda County Individualized Child Care Subsidy Plan" or "the AB833 Pilot Plan"); and

WHEREAS the AB833 Pilot Plan, including evaluation design and outcome measures, has been preliminarily reviewed by the Early Education and Support Division of the California Department of Education; and

WHEREAS the AB833 Pilot Plan has been approved by the local Early Care and Education Planning Council; and

WHEREAS on Monday May 23, 2016, a public hearing was held on the AB833 Pilot Plan; and

WHEREAS this Board has considered the AB833 Pilot Plan and found that it meets the requirements in the authorizing legislation (AB833);

NOW, THEREFORE, IT IS HEREBY DETERMINED AND ORDERED that the Plan is approved by this Board of Supervisors

PASSED AND ADOPTED THIS 2nd day of August 2016 by the Board of Supervisors of Alameda County, California.

Scott Haggerty, PRESIDENT, BOARD OF SUPERVISORS

AYES:
NOES:
EXCUSED:

APPROVED AS TO FORM:
Donna R. Ziegler, County Counsel

by
Kathleen Pacheco, Senior Deputy County Counsel

ATTEST
Clerk, Board of Supervisors, County of Alameda

THE FOREGOING was **PASSED** and **ADOPTED** by a majority vote of the Alameda County Board of Supervisors this **2nd** day of **August 2016**, to wit:

AYES: Supervisors: Carson, Chan, Miley, Valle & President Haggerty – **5**

NOES: None

EXCUSED: None

PRESIDENT, BOARD OF SUPERVISORS

File No: **29780**
Agenda No: **59**
Document No: **R-2016-243**

I certify that the foregoing is a correct copy of a Resolution adopted by the Board of Supervisors, Alameda County, State of California
ATTEST:
Clerk of the Board
Board of Supervisors

By: _____
Deputy

v:\agenda\forms\resobak.doc