



STATE OF MICHIGAN
DEPARTMENT OF EDUCATION
LANSING

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GOVERNOR

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STATE SUPERINTENDENT

September 1, 2016

Ms. Rachel Schumacher, Director
Office of Child Care
330 C ST SW, Room 4502
Washington, DC 20201

Subject: Michigan CCDF Waiver Request

Ms. Schumacher:

In Michigan, reauthorization of the Child Care and Development Fund (CCDF) program brings about a number of positive changes for Michigan children, families, and providers. As changes have been implemented we've received support for the implementation of twelve month eligibility, changes to our policy for homeless families, as well as encouragement for pending changes that were described as part of our public hearing process.

Due to the rule making process in Michigan some of the required changes will need additional time to implement. As we work toward implementation, careful and thorough analysis was done with the Department of Licensing and Regulatory Affairs (LARA), which is where child care licensing is housed, as well as other partners and stakeholders. This analysis was to ensure that we have identified all needed changes to improve delivery of services for Michigan's children.

In addition, over the last six months Michigan has been engaged in conducting research on child care in Michigan. As part of this work input was gathered from providers, parents and community partners who are engaged with the system. As we work toward implementation of the following requirements, we want to continue this careful and thorough analysis to ensure we are meeting the needs as identified by the users.

At this time, Michigan is formally requesting waivers for the implementation of the following requirements:

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Section 2.2.8 Developmental Screenings

The primary reason for this waiver request is to allow for the Department to engage a cross departmental team to create a strategy that reaches beyond the lead agency and better serves children and families by ensuring we are providing information on developmental screening tools and processes to both providers and families.

While Michigan currently has developmentally screening opportunities available we currently lack the coordination of information and clearly articulating processes that would better serve children and families. We believe that the cross agency work in order to ensure collaboration does not jeopardize the health, safety, and well-being of children served through our program.

While doing this cross agency work all current developmental screening opportunities will remain in place in or to maintain the health, safety, and well-being of the children served.

The expectation is that we will have completed this cross agency work and implementation of strategies will occur no later than September 30, 2017.

Section 3.2.2 Homeless

The primary reason for this waiver request is related to providing a grace period for homeless children to comply with immunization requirements. Over the past several months the Department has participated in a cross agency work group looking at immunization requirements across programs, within our Public Health Code and within our child care licensing rules. The cross agency workgroup has recently made recommendations to the various Departments related to streamlining policy, system changes and communication strategies that will allow us to address this in a comprehensive and systemic manner.

The Michigan Department of Education has already implemented policy changes related to eligibility for homeless populations and will continue to partner with the other agencies, including LARA to make law and rule changes. This strategy allows us to keep current rules and requirements in place during the revision to meet the new rules and requirements so the health, safety, and well-being of the children served will not be compromised.

While doing this cross agency work related to immunizations children will still be allowed to participate in programs where we will continue maintain the health, safety, and well-being of the children served.

The expectation is that we will have completed the revisions to policy and child care licensing rules by no later than September 30, 2017.

Section 4.4.2 Payment Rates

The primary reason for this waiver request is to allow for the review of Michigan's 2015 Market Rate Survey (MRS). As part of this review MDE is partnering with Public Sector Consultants (PSC) to develop recommendations on payment rate changes that take into account the MRS, geographic variations in Michigan, cost of care for different ages of children and incentives for quality. We expect the recommendation to be presented to the Department in the fall of 2016 and the recommendation will be used to help the Department request funding to support changes that more closely align with the costs of providing high quality care in Michigan.

While providers are at a disadvantage, and often frustrated with our rate they do not jeopardize the health, safety, and well-being of children served through our program.

While doing this research Michigan will continue to pay providers using our tiered reimbursement strategy, which we believe will help maintain the health, safety, and well-being of the children served.

The expectation is that we will have completed the research and technology changes required to meet this requirement by no later than September 30, 2017.

Section 4.6.2 Priority for Investments

The primary reason for this waiver request is related to gathering feedback from parents, providers and the public, as well as utilizing current research and best practices to gather to look at strategies for implementing priority investments related to areas of high unemployment and poverty that meet the new reauthorization requirements.

We believe that the research that is being gathered and the review of best practices will improve access to high quality care for children in Michigan and that the time used to analyze this information does not jeopardize the health, safety, and well-being of children served through our program.

While doing this review we do believe that program requirements already in place, along with policy changes to support children and families that we've already been able to implement will ensure that we are maintaining the health, safety, and well-being of the children served.

The expectation is that we will have completed this review of strategies and identification of potential strategies no later than September 30, 2017.

Ms. Rachel Schumacher

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If you have any questions or concerns about this waiver request and our implementation plans, don't hesitate to contact me for further information.

Regards,

A handwritten signature in black ink that reads "Lisa Brewer Walraven". The signature is written in a cursive style with a large initial "L".

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Cc: Susan Broman