



# Tribal CCDF American Rescue Plan (ARP) Act Child Care Stabilization Grants Interview Question

**Purpose of this guide:** The Tribal Child Care Capacity Building Center (TCBC) team and the OCC Regional Offices will use this guide during a one-hour call with Tribal CCDF Lead Agencies to understand the implementation of their ARP Act Child Care Stabilization Grants.

**PAPERWORK REDUCTION ACT OF 1995 (Pub. L. 104-13) STATEMENT OF PUBLIC BURDEN:** The purpose of this information collection is to help the Office of Child Care (OCC) identify the technical assistance needs to support the implementation of American Rescue Plan funding. Public reporting burden for this collection of information is estimated to average one hour per grantee response, including the time for reviewing instructions, gathering and maintaining the data needed, and reviewing the collection of information. This is a voluntary collection of information. An agency may not conduct or sponsor, and a person is not required to respond to, a collection of information subject to the requirements of the Paperwork Reduction Act of 1995, unless it displays a currently valid OMB control number. The OMB # is 0970-0531 and the expiration date is 07/31/2022. If you have any comments on this collection of information, please contact Stacy Cassell, [stacy.cassell@acf.hhs.gov](mailto:stacy.cassell@acf.hhs.gov).

## Initial Dialogue with Tribal CCDF Grantee

- ◆ Review agenda for the call
  - Suggested agenda items for initial call:
    - Welcome
    - Opportunity for Tribal CCDF Administrator to ask general questions
    - Notice of Grant Award letter for child care stabilization funds
    - Updates on status of child care stabilization funds from Tribal CCDF Administrator
    - Brief overview of allowable uses of child care stabilization funds
    - Status of offering child care stabilization subgrants
    - Guiding questions on understanding of community needs
    - Construction or major renovation project status
    - Flexibilities of the ARP Act Child Care Stabilization funds
    - Discussion on specific topical area of interest
    - Available TA resources to meet immediate needs (TCBC TA Specialists, SME Team, Stabilization Grants resources on the OCC TA website, etc.)
    - Wrap up and next steps
- ◆ Answer Tribal CCDF grantee if they any general questions
- ◆ Ask Tribal CCDF grantee if they have received their grant award and if they need any clarification about their award
- ◆ Ask the Tribal CCDF grantee to provide an update of their status regarding the ARP Act child care stabilization funds they received.

## Implementation Guide – Exploring



- If the grantee is at the beginning phases of development (exploring or developing stages) or has not yet begun to draw down the ARP Act funds, ask what obstacles or complexities they may have that is preventing them from utilizing the funds.
  - Note any key information that will help address the barriers the grantees may be facing.
- ◆ Ask the Tribal CCDF grantee if they are understanding the allowable uses of the ARP Act child care stabilization grants funding?
  - Do they understand the differences between the different types of ARP Act CCDF funding they received?
- ◆ Ask the Tribal CCDF grantee if they are offering child care stabilization subgrants.
  - If so, where are they in the process?
- ◆ Ask Tribal CCDF grantee any guiding questions regarding their community needs regarding the stabilization of child care:
  - What is the status of their child care providers and/or tribally operated centers?
  - Are relative providers or home family care other options they are utilizing?
  - Are there existing barriers to accessing childcare for the families they serve?
- ◆ Ask the Tribal CCDF grantee if they are using the ARP Act child care stabilization grant funds for construction or major renovation?
  - If yes, ask the following questions:
    - What type of project have you proposed?
    - How much money have you requested to set-aside?
    - What is the status of your application?
- ◆ Highlight flexibilities of the ARP stabilization funding to ensure the grantee is aware of all the possibilities.
  - Ask grantees, “What do you think this could look like for your program?”
- ◆ **Based on this initial conversation with the grantee, go to the appropriate topic area(s) below and use the talking points, guiding questions, and examples to support the grantee as needed.**
  - Use the *Implementation Planning Tool* to make note of goals for each area and identify action steps as indicated by Tribal CCDF Administrator during discussion.
- ◆ Share that the Tribal Child Care Capacity Building Center’s Tribal TA specialists and Tribal Subject Matter Experts are available to assist them to explore the possibilities, assist in creating goals and timelines, and provide resources that may help them along the way.

## Key Topics

After your initial conversation with the grantee, you will likely want to address the key topic areas listed below, using the talking points, guiding questions, and examples provided in each section.

- ◆ [Capacity](#)
- ◆ [Fiscal Management](#)
- ◆ [Programmatic Policies and Procedures](#)
- ◆ [Allowable Spending Categories](#)
- ◆ [Set Aside for Administrative Expenses, Supply Building & Technical Assistance](#)

## Capacity

It will be important to think about your (the CCDF Administrator’s) capacity in terms of your bandwidth, your availability, and the amount of time you can dedicate to exploring the requirements and thinking about the ways you might implement ARP Act child care stabilization grants in your CCDF program.

## Guiding Questions

## Implementation Guide – Exploring



- ◆ What does your current day-to-day look like as you administer your CCDF program?
- ◆ Are there activities or tasks you can delegate to either your other CCDF staff (if any) or other Tribal program/department staff that can help take some things off your plate?
- ◆ Are there ways you can rearrange your schedule, so you have some time to do some brainstorming, strategizing and planning around understanding the requirements for these ARP Act stabilization grants?
- ◆ Have you discussed your current capacity with your HR department or Tribal leadership?
- ◆ Have you explored the possible uses of the 20% administrative set-aside within the Information Memorandum (IM)?

## Fiscal

You may have noticed that you've received several different Notice of Award Letters from ACF regarding your CCDF funds. Let's take a look at your award letters on the ARP Act funds. You'll want to look for three different ones – and we want to see what your funding amount is for the ARP Act child care stabilization grants funds. Another way you can find this information is to access the OCC website, go to the Funding tab, scroll down to Tribal, and click on the FY 2021 Tribal Allocation amounts. There is a chart that you can download and print that has all of the current Tribal CCDF grantees amounts, and it breaks it down by CCDF funding stream, including all of the COVID-19 relief funds.

### Guiding Questions

- ◆ Have you had initial conversations with your finance department about the amount of funds, allowable uses, and obligation and liquidation periods?
- ◆ Have you explored your fiscal policies to ensure awarding sub-grant fiscal policies and procedures are in place?
- ◆ Has your Tribal finance department received the Notice of Award letter for the FY2021 ARP Act Child Care Stabilization Grants funds?
- ◆ Do you have a way to track the different CCDF funding award letters you are receiving?
- ◆ Would you like us to do a demonstration of how to use an Excel sheet to plan your budgeting for these ARP Act Child Care Stabilization Grants funds?
- ◆ How would the Tribal lead agency ensure that the funds used for the Tribally operated center were to supplement not supplant other funding sources?
- ◆ \*\*\*Note: Remember any fiscal transactions must meet the Tribe's internal fiscal policies as part of the Tribe's financial management system.

## Programmatic Policies & Procedures

To effectively roll out the stabilization grant program, CCDF administrators may need to look at their current policies and procedures for guidance and also to determine if additional policies and procedures may need to be developed to safeguard these Federal funds. Use the guiding questions to evaluate your current policies and procedures.

### Guiding questions

- ◆ How many providers are located within the Tribal service area that may qualify for a stabilization grant?
- ◆ Would the Tribal lead agency choose to only support the Tribally operated center with the stabilization funds?
- ◆ How can the Tribe reach more unapproved or unlicensed providers, and would these providers meet the definition of eligible providers?
- ◆ What is considered an eligible provider?
- ◆ What do you call providers who receive CCDF subsidy currently? (i.e. approved, registered, certified, etc.)

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- ◆ Would you consider a tiered approach to “rolling out” the application for subgrants? Conducting outreach to providers? Sending the applications to providers?
- ◆ Who will be responsible to review applications from providers for stabilization grants?
- ◆ How will approvals of applications be determined?
- ◆ Will providers be able to apply for stabilization grants more than one time? If yes, at what interval?
- ◆ What information will the finance department need in order to make payment?
- ◆ What information would be necessary for a provider to share with the Tribal lead agency on their application?
- ◆ Have you consulted with your Tribal legal department to determine if there needs to be some type of contract or legal agreement between the Tribal lead agency and the provider in order to issue a stabilization grant?

## Allowable Spending Categories

As you move toward implementation with the ARP Act child care stabilization funds, it is important for you to explore the allowable spending categories. Tribal CCDF grantees may set-aside up to 20% of their stabilization funding award for administration, activities to support supply building, and technical assistance.

- ◆ There are 5 specific activities mentioned in the OCC Guidance:
  1. Administering stabilization subgrants
  2. Activities to increase the supply of child care
  3. Technical assistance and support for subgrant applications
  4. Publicizing the availability of subgrants
  5. Technical assistance to providers to meet requirements throughout the subgrant period.
- ◆ Base amount funds are not subject to the administrative cap.
- ◆ The remaining funds (at least 80% for Tribes) must be used for subgrants to qualified child care providers. Providers receiving subgrants must use the funds for at least one of the following activities:
  - Personnel costs, benefits, premium pay, and recruitment and retention.
  - Rent or mortgage payments, utilities, facilities maintenance and improvements, or insurance.
  - PPE, cleaning and sanitization supplies and services, or training and professional development related to health and safety practices.
  - Purchases of or updates to equipment and supplies to respond to COVID-19.
  - Goods and services necessary to maintain or resume child care services.
  - Mental health supports for children and employees.

## Set Aside for Administering Child Stabilization Subgrants

### Talking Points

- ◆ Tribal Lead Agencies can use the 20% administrative set aside to support in administering their child stabilization subgrants.
- ◆ If your lead agency is already at capacity and does not have the personnel or resources to administer the child stabilization subgrants, you may want to consider using the set aside for hiring additional staff or contracting with an intermediary.
- ◆ This might look like hiring a team of individuals who is solely responsible for administering the stabilization subgrants or contracting with an intermediary, such as a trusted consulting agency with specialized experience in child care and federal grants.(so they don't get in audit finding trouble)

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- ◆ You can also use the set aside to purchase resources and equipment. Perhaps you need technology upgrades to manage the additional funding received. This could look like purchasing new computers, operating systems, laptops, and/or accounting software such as QuickBooks.

### Guiding Questions

- ◆ What would be most helpful to your lead agency in administering the child stabilization subgrants?
- ◆ In a perfect world, how many additional staff would you like to assist in administering the child stabilization subgrants? How many staff are currently supporting this effort?
- ◆ Have you considered contracting with an intermediary such as a consultant to administer the child stabilization subgrants and if so, what intermediaries?
- ◆ What types of technological equipment or supplies might be helpful to your lead agency in administering the child stabilization subgrants?
- ◆ Do you have support of Tribal leadership in your plan for administering the child stabilization subgrants?

## Carrying Out Activities to Increase the Supply of Child Care

### Talking Points

- ◆ You can also use the administrative set aside to pay for activities that can help your lead agency increase the supply of child care in your service area.
- ◆ These activities include developing startup resources and grants for new child care providers, creating a finance program for startup expansion with low or no-interest loans, staffed family child care networks, technical assistance on business practices for new providers, developing and implementing a strategic plan for supply building, improvements to lead agency data systems to manage an increased supply, conducting community needs assessments, increasing access to licensing or participation in quality rating and improvement systems, and facility improvement grants for providers.

### Guiding Questions

- ◆ What types of child care providers are in highest demand in your service area?
- ◆ What would incentivize individuals to become child care providers; i.e. do they need financial support to startup childcare service?
- ◆ What do current providers need to increase their capacity to deliver high quality child care?
- ◆ How can you incentivize providers in non-standard hour care, infant and toddler care, care in underserved areas, and care for children with disabilities?

## Providing Technical Assistance & Support for Subgrant Applications

### Talking Points

- ◆ Providers in your service area may need assistance completing your lead agency's subgrant application.
- ◆ You may want to consider using part of the administrative set aside to pay for dedicated total free technical assistance to any providers interested in applying for subgrants, to make the application process more accessible and efficient.
- ◆ Technical assistance could be offered to providers in many forms, such as a technical assistance hotline that walks providers through the application process.

### Guiding Questions

- ◆ Are providers in your service area struggling to complete your subgrant application process?
- ◆ What types of technical assistance would be most helpful to providers as they work on submitting subgrant applications?



## Publicizing the Availability of Stabilization Subgrants

### Talking Points

- ◆ Publicizing the availability of stabilization subgrants is key to making providers aware of this subgrant opportunity in a timely manner.
- ◆ Strategically selecting methods to publicize the availability of stabilization subgrants can help your lead agency maximize the amount of providers who apply.
- ◆ Consider how to reach the highest number of providers in your service area; would social media or online advertising be the most effective?
- ◆ Is there a Tribal newsletter that has a large readership?
- ◆ Are there central places in the community that subgrants could be advertised via flyers or in person announcements?
- ◆ Are there leaders/influential people in the community that could share the subgrant opportunity to reach a large audience?
- ◆ How you publicize your subgrants should be based on the predominant methods of communication in your service area.

### Guiding Questions

- ◆ How do people in your service area get information?
- ◆ What sources do people rely on for news and community updates?
- ◆ Does your Tribal Lead Agency have a website and/or social media that it uses to post updates and are these sites well trafficked?
- ◆ Are there particular community leaders and/or central clubs, organizations, churches or businesses that reach a wide audience whom could publicize the stabilization subgrant opportunity?

## Providing Technical Assistance to Providers Receiving Stabilization Subgrants

### Talking Points

- ◆ Once providers receive stabilization subgrants from your agency, they may need ongoing support in managing their subgrants.
- ◆ It may be worthwhile to use some of the administrative set aside funds to pay for different forms of technical assistance that would help providers implement their subgrants and take some of the burden off of those providers who are already overextended.
- ◆ Technical assistance can be provided to providers to meet the requirements in these three areas, health and safety requirements, continuing to pay full wages, and, to the extent possible, providing copay or tuition relief for families.
- ◆ Consider what types of technical assistance would be most useful to providers in successfully managing their subgrants; this could be in specific areas such as meeting the reporting requirements, health and safety requirements, fiscal requirements to avoid audit findings, etc.
- ◆ It is in the lead agency's best interest to ensure that providers who have received subgrants utilize the funds effectively and correctly as the lead agency will ultimately be held responsible for how individual providers operate their child care services.

### Guiding Questions

- ◆ What forms of technical assistance would be most helpful to providers in your service area in managing their stabilization subgrants?

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- ◆ What are current challenges providers in your service area face in delivering child care that might also apply in their subgrant implementation?
- ◆ Would providers benefit from having access to individualized support throughout their subgrant period to assist them with meeting reporting requirements, health and safety requirements, fiscal requirements, and other types of requirements?

### Additional Allowable Cost Categories

#### Personnel Costs

##### Talking Points

- ◆ Personnel costs can be influenced by many factors including the size of the program, ratios and group size, staffing, salaries and wages and benefits.
- ◆ The ARP funds can be utilized for increasing wages, benefits like health insurance, retirement benefits, and paid time off. It is important to consider strategies you may use to provide immediate relief to the workforce, with activities that are critical and timely.

##### Guiding Questions

- ◆ What are some factors that influence personnel cost, such as ratios and group sizes that affect staff patterns salaries and benefits?
- ◆ Have you thought about increases to salaries and the impacts it could have to your program or provider's program?
- ◆ Have providers thought about considering offering benefits such as health insurance for employee retention?
- ◆ What are some other types of compensation strategies you think would be beneficial to your program?
- ◆ Have you considered including pay and salary increases as an expectation for all QRIS participating programs?

#### Rent, Utilities, Facilities Maintenance, and Insurance

##### Talking Points

- ◆ Think about what might be necessary to maintain or improve provider facilities in order to comply with safety guidance, which may include any COVID-19 concerns. It is important to think about the accessibility needs for any children or family members with disabilities.
- ◆ Any facility renovations should strive to create an inclusive and welcoming environment within a developmentally appropriate context.

##### Guiding Questions

- ◆ Do your providers have sanitization capabilities?
- ◆ Do they have appropriate refrigeration?
- ◆ Are all children able to easily access the facility or home as well as traverse the home?
- ◆ If the play area is outside, is it safe from any potential threats such as dogs or unfamiliar persons?
- ◆ Do providers have enough money to afford facility rent?
- ◆ Is the facility capable of supporting COVID-19 precautions?
- ◆ Is electricity or internet connectivity an issue?

#### PPE, cleaning, and other health and safety practices

##### Talking Points

## Implementation Guide – Exploring



- ◆ Uses of funds under this category are not limited to those designed specifically in response to the COVID-19 public health emergency and may include equipment, supplies, services, and training that support meeting state and local health and safety guidelines, including those related to the prevention and control of infection diseases, prevention of sudden infant death syndrome and use of safe sleep practices, administration of medication (consistent with standards for parental consent), prevention and response to emergencies due to food and allergic reactions, building and physical premises safety, prevention of shaken baby syndrome and abusive head trauma and child maltreatment, response planning for emergencies from a natural disaster or a man-caused event, handling and storage of hazardous materials and the appropriate disposal of biocontaminants, appropriate precautions in transporting children, pediatric first-aid and CPR, and recognition and reporting of child abuse and neglect.

### Guiding Questions

- ◆ Are providers able to implement health and safety practices?
- ◆ Do providers need additional assistance with cleaning and sanitizing?
- ◆ Is the carpet and flooring within child care areas in good repair? Can it be easily cleaned and sanitized?

## Equipment and Supplies

### Talking Points

- ◆ This category includes purchases of or updates to equipment and supplies to respond to the COVID-19 public health emergency. So long as the equipment and supplies are in response to the COVID-19 public health emergency, they may include indoor and outdoor equipment and supplies that facilitate business practices consistent with safety protocols and developmentally appropriate practice, as well as business items needed to respond to new challenges, such as business software and upgrades.
- ◆ This also includes technological upgrades that programs can use to collect data and report to lead agencies.

### Guiding Questions

- ◆ Do your family child care or relative providers have adequate appliances to ensure clean and sanitized blankets, dishes and toys?
- ◆ Do they have adequate refrigeration and freezers to cool and keep an adequate supply of food on hand?

## Goods and Services

### Talking Points

- ◆ This category includes any material good or service necessary for the operation of a child care program. Lead agencies are encouraged to treat this term broadly, in accordance with the breadth of the language used in the statute, so that child care providers can flexibly meet their individual needs. Examples of goods that might be necessary to maintain or resume child care services include food and equipment and materials to facilitate play, learning, eating, diapering and toileting, or safe sleep.
- ◆ Examples of services that are allowable include business automation training and support services, shared services, child care management services, food services, and transportation.
- ◆ The category also covers fees associated with licensing and costs associated with meeting licensing requirements.

### Guiding Questions

- ◆ Do your child care providers have software to manage their child care business?
- ◆ Do the child care program and the child care providers have an adequate supply chain for supplies needed for effective operations?





## Mental Health Services

### Talking Points

- ◆ As you think about the impacts of the COVID-19 pandemic, consider the impacts of mental health as an important component to a child's safety and wellbeing. Mental health impacts all aspect of a child's life, including their ability to succeed in school and progress throughout adolescent developmental stages.
- ◆ Children who are returning to child care centers after an extended period at home will need support to acclimate to a new environment. Child care staff, and family child care providers, families and children have experienced various levels of stress and trauma.
- ◆ The ARP stabilization funds provide an opportunity for lead agencies to invest in mental health supports for child care providers and children.

### Guiding Questions

- ◆ Do you providers have mental health supports in place for both children and employees?
- ◆ What are the mental health needs for children in your community?
- ◆ Have you conducted a needs, strengths, and opportunities assessment?
- ◆ What are potential barriers to accessing mental health services?
- ◆ What are ways to expand the reach of services?
- ◆ What are ways that you can evaluate the impact of the mental health services in place?
- ◆ Do your TOC or child care program have mental health policies and procedures developed?
- ◆ Have you considered hiring additional staff to meet the relational needs of children in the classroom and the work of the teacher?
- ◆ Do you have any cultural supports in mind to support the mental health of children and providers?
- ◆ Are there any Indigenous holistic approaches available in your community to support mental health?

## Paying for Past Expenses

### Talking Points

- ◆ Prior to the passage of ARP, child care providers incurred substantial financial losses. Paying for past expenses is one vital way to ensure future viability and that any remaining after-effects of the COVID-19 pandemic are addressed.

### Guiding Questions

- ◆ Were funds spent on any sanitation supplies or equipment?
- ◆ Were any expenses related to accommodating new safety and staffing protocols?