



DUAL LICENSE PROGRAM EVALUATION PILOT STUDY



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Washington State Department of
CHILDREN, YOUTH & FAMILIES

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Executive Summary

HB 2619, Section 7 (2020) directed the Department of Children, Youth, and Families (DCYF) to conduct a Dual License Pilot (pilot) to assess the benefits and challenges associated with dual licensure. This report follows the implementation plan sent to appropriate committees and the Governor on July 1, 2021. As directed by the Legislature, the pilot commenced by July 1, 2020, and concluded by June 30, 2022. The pilot was in response to the Foster Parent 1624 Advisory Committee that identified a lack of options for child care available to foster children in Washington State.

There is a higher level of complexity and liability in holding multiple licenses. In Washington State, it is rare to hold an early learning and foster care license due to the extraordinary level of responsibility. Prior to the pilot, there were only a handful of cases in Washington of permitted multiple licenses, dependent on a family home provider maintaining foster care capacity at all times. Foster parents are required to have child care in place if they are working. Limited child care options can limit or prohibit individuals from becoming foster parents. The pilot explored the effects of foster care placement and the correlation of child care availability specific to foster children with intentional design to identify regulation revisions and processes to streamline the dual licensing system.

Key Findings

- The full potential to increase capacity is yet to be realized as the pilot commenced and concluded during the COVID-19 pandemic. Capacity is anticipated to increase as the impact of COVID-19 diminished. The pilot resulted in a slight increase to child care and foster care services statewide. Numbers are only part of the story. When children are able to receive care in their own homes, foster care children experience fewer transitions and are able to start in familiar environments. Additionally, child care centers, in turn, were able to offer child care slots to other children in their communities.
- There were very little conflicting rules when cross walking the WAC for foster licensing and early learning licensing. It was decided each license would remain independent. Interpretation of capacity regulation did not specifically outline the need to restrict capacity to the most restrictive. Clarifications were put into place so that child care rules applied only during child care hours, while foster care rules were to be followed at all times, and the more restrictive respective rule would be followed when there was variation between foster care and early learning rules.
- Financial resources provided to the foster families and providers were key to the pilot's success. There should continue to be a distinction between a child care subsidy payment for children enrolled in a provider's early learning program and a child welfare reimbursement.
- There was more interest from foster parents becoming dual licensed child care providers than from child care providers interested in becoming licensed foster parents. However, child care licensees were largely more successful obtaining the second foster license.
- There were no increased levels of licensing violations, intakes or injuries to children within dually licensed homes during the pilot timeline.

Recommendations

DCYF recommends that providers be allowed to carry multiple out-of-home licenses and that the agency continues to remove any historic or remaining barriers to make holding multiple licenses more accessible and

affordable. These recommendations include revising limited WAC for clarification, establishing shared methods for data sharing, streamlining providers' professional development systems and background checks, and continue to support dually licensed providers through foster care maintenance and child care subsidy payments. For providers with both child care and foster care licenses, the pilot helped to alleviate the struggle of finding licensed child care for the children placed in their home while also easing the financial burden of maintaining their child care income.

Dual License Pilot Project

Background

The Bipartisan Budget Act of 2018 outlines the need to identify foster care licensing standards. It specifically requires states to place safety measures into foster care licensing standards in order to receive financial support from the federal budget. These requirements are broadly inclusive of foster home eligibility requirements, background check requirements, living space and home condition, sleeping arrangements, emergency preparedness, transportation requirements, and training requirements. Also included in the standard requirements is the foster home capacity. It states: Foster Home Capacity: The total number of children in foster care in a family foster home, must not exceed six (6) consistent with section 472(c)(1)(A)(ii) (111) of the Act. Per section 472(c)(1)(B) of the Act, the number of foster children cared for in a foster family home may exceed this numerical limitation at the option of the title IV—E agency for any of the following reasons:

1. To allow a parenting youth in foster care to remain with the child of the parenting youth.
2. To allow siblings to remain together.
3. To allow a child with an established meaningful relationship with the family to remain with the family.
4. To allow a family with special training or skills to provide care to a child who has a severe disability.

Several states allow for and monitor dual licensure between foster care and family child care, but with strong restrictions. For instance, states that allow dual licensure have developed a waiver or exemption system that considers potential dual licensed programs on a case-by-case basis and waives or exempts specific rules accordingly. Dual licensure also requires coordination between regulatory agencies. When licensing rules for different types of care contradict or conflict with each other, it is common for regulating agencies to require a provider to adhere to the more stringent set of rules.

Washington Case Studies

While it is reported there are limited child care options for foster children in Washington State, the following examples suggest that allowing foster parents to also be child care providers has not been an easy solution to address this shortage. Without the pilot considerations, Washington State only allows dual licensure when a family home provider maintains foster care capacity at all times (which is significantly less than a child care capacity in most cases). There have been limited exceptions to this rule.

In 2017, an already established licensed child care provider requested dual licensure to foster her infant/toddler nephew from another state; she also expressed a willingness for future adoption. At the time,

the provider was licensed for 12 children in her child care home and was only caring for 10. Her own children were above the age of capacity determination. The request was approved, with child care capacity maintained, to allow for culturally appropriate family placement of the child.

Three other exceptions have been requested. In one case, a foster parent also held a family home child care license and when requesting a capacity increase, relinquished the foster care license to provide child care for more children. In another instance, a currently licensed child care provider requested and was approved for a foster license for the sole purpose of adoption. At the time, this provider did not have any foster children in placement, limiting the impact to the home. In a third case, a licensed child care provider with capacity of 12 applied for a foster care license to care for kinship placement(s). When the provider realized she would need to decrease her child care license capacity, she opted to complete the home study without the added support of becoming licensed.

What is most evident when looking through the national lens is that many states, including Washington, have interpreted the federal requirement of “The total number of children in foster care in a family foster home, must not exceed six (6) ...” to mean that no more than six children (of child care ages) can be in the home at any one time. However, with clarity provided from the Children’s Bureau, ACF/US DHHS Region 10, this federal standard only outlines the maximum number of foster children receiving 24-hour substitute care from that provider and is not inclusive of children not in the foster care system.

The Problem

The problem is that there is limited child care available to care for foster children. This limits, and in some cases prohibits, working individuals from becoming foster parents. If working adults express an interest in becoming a foster parent(s) and there are no immediate openings in licensed child care for the child(ren), then it is likely the family will not be able to become licensed for foster care or will become licensed but will not be able to take placement until child care becomes available. Recently, there has been expressed interest from existing foster families in Washington State to care for the children of neighboring or related foster families through obtaining a child care license. According to the July 2018 meeting minutes of the 1624 Advisory Committee, there is a significant lack of placement into licensed child care for foster children, and Family, Friends, and Neighbor (FFN) care is not adequate to address the need.

Due to current WAC, the number of children a licensed family home child care provider who is also a foster parent can have in care is limited by no more than foster care maximum capacity, which is six (at most) with two caregivers present, or four with only one caregiver; biological and foster children are included in capacity. Due to this limitation, there have been limited numbers of exceptions requested due to the fact it isn’t cost effective (or profitable) to hold dual licenses. Due to these barriers, the dual license pilot gathered further data to specifically identify the need within Washington to hold dual licenses, allowing foster parents to provide careers or substantial household income. Overall, Washington State’s exceptions to dual licensure aligns with other national practices. However, the need for additional child care capacity specifically for the unique population of foster children highlighted an opportunity to explore regulation revisions and processes toward a streamline dual licensing system.

“When I opened child care in my home, the cost of child care merely transferred from the daycares they were attending to this current one they attend in my home. I am now licensed for 12, allowing me to provide care for 8 additional community children and freeing up 12 spots in other centers. I also am paying a staff member anytime more than 6 children are present.”

House Bill 2619 § 7

- (1) DCYF shall establish a pilot project to create a dual license that allows individuals to receive a combined foster care and child care license. The pilot project must commence by July 1, 2020, and conclude by June 30, 2022.
- (2) The department must consult with stakeholders in the foster care and child care sectors during the design and implementation of the pilot project.
- (3) The department may adopt rules to implement the pilot project and may waive or adapt licensing requirements when necessary to allow for the implementation of a dual license for individuals.
- (4) The department must provide a brief status report to the appropriate committees of the legislature and the governor by July 1, 2021, describing implementation of the pilot project. By Nov. 1, 2022, the department must recommend to the governor and the appropriate committees of the legislature whether the dual license pilot project should be made permanent.
- (5) This section expires Nov. 1, 2023.

Project Charter

See Appendix A for the complete project charter.

Staffing Structure

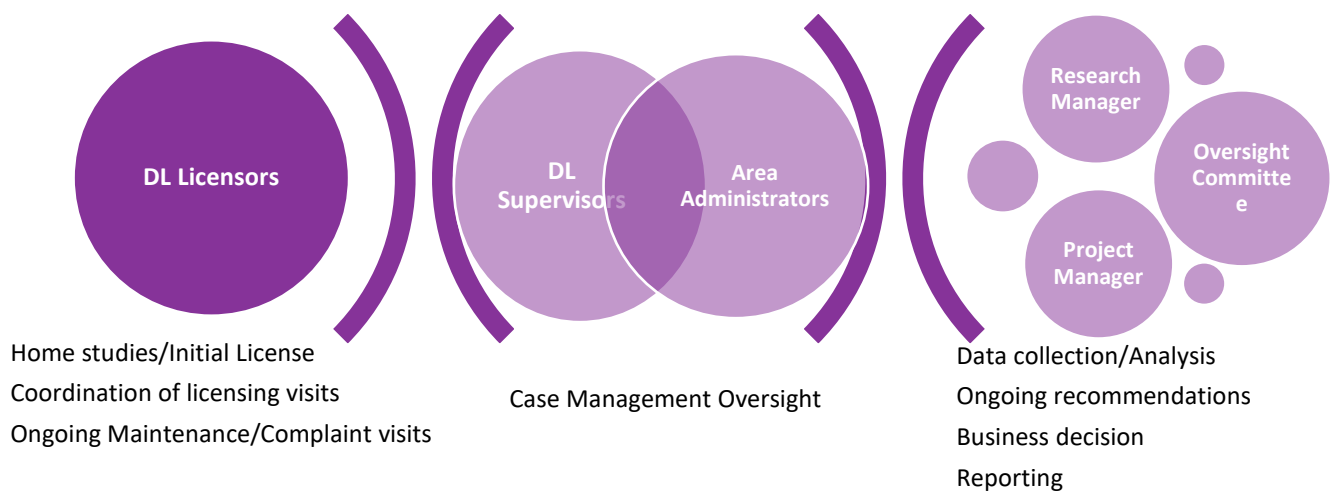
The dual licensing teams consist of two child care licensors, one foster care licensor, one child care supervisor, one foster care supervisor, and an area administrator within both foster and child care. DCYF staff involved within the pilot operated within normal job duties in either child care or foster care services. In addition to the normal caseloads, designated licensors were assigned the applications and case work for the new license for which the applicant is pursuing within their scope of assignment (child care or foster care). Once the new license was issued, the current license was re-assigned to the designated licensor on the dual license team for that license (foster care or child care). Ongoing case management was done by both the child care and foster care licensor collaboratively.

The designated supervisors oversaw the individual casework specific to their scope of responsibility (child care or foster care) of the dually licensed providers regardless of the provider’s geographical location in the state.

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The two supervisors worked collaboratively, inclusive of staffings with the appropriate area administrator, to provide oversight and supervision of the dual license provider. This did not include supervisory responsibilities of the staff themselves as this work is to be completed by their assigned supervisor. Staff designated for the work were identified and approved by licensing division executive leadership.

The pilot oversight was provided by the project manager who ensured the appropriate case assignments were made, communication between the licensing team was completed, and data gathered, including any decisions needed by the oversight team. The oversight team included the executive sponsor and all licensing division state administrators as well as subject matter experts from both child care and foster care licensing and external partnerships. It also included a representative from Foster Parent Association of Washington (FPAWS) and a DCYF Tribal Liason.



Study Methodology

The Purpose

The purpose of conducting a dual license pilot was to explore the effects to foster care placement and the correlation of child care availability specific to foster children. An intentional study design outlined requirements and regulatory changes needed within a home that is licensed for both foster care and child care simultaneously, ensuring considerations for child safety and license accessibility.

Research Questions

1. What are the effects of dual licensing on rural and urban access to child care for foster children?
2. What are the effects of dual licensing on the rate of placement for children in foster care to families with immediate child care needs?
3. What are the policy outcomes surrounding pilot for a dual license?
4. What are the financial implications of dual licensing to both the provider and DCYF?
5. What are the effects of a unified oversight system for dually licensed providers?
6. How does dual licensing affect the rate of provider licensing violations, valid complaint findings, and adverse actions?

Recruitment

The project recruited from all statewide licensed family home child care and foster care providers. In order to provide some initial safety guidelines and study consistency, we required that any participants will have been licensed with DCYF (either as a family home provider or foster care provider) and in good standing (without licensing actions levied) for at least one year. This ensured that providers already understood the foundational requirements of oversight and coordination with DCYF in an effort to limit the potential of overwhelming any one provider. Other license restrictions were outlined specifically in the recruitment and informed consent materials and included limitations to foster child placement of children with specifically high emotional, developmental, and physical needs. This allowed a baseline of restrictions that, if not put in place, could affect child safety by limiting the delivery of quality individual services to identified children with higher supervision needs during child care hours. By providing early transparency, we were able to provide a general understanding of the licensing process and DCYF expectations before adding a secondary license. Recruitment letters and informed consent were drafted and distributed via email to ensure participation is voluntary.

Our initial recruitment provided what we felt was a large amount of interest. Due to the requirements of needing to be licensed for at least a year in either service type, we sent emails to all licensed foster care and family home child care providers. The initial interest within the first week was around 80, and by the end of the pilot that number reached 118 providers statewide. Interestingly, the initial interest was higher for foster parents becoming child care licensed. From the interested pool of participants, we found the 34% of those recruited were able to participate in the pilot in some way (some became dually licensed, others started the process but did not finish, while a small subset continued to participate through observation and stakeholder feedback). Of that 34%, 15 successfully became dually licensed. The highest percentage of success rate for those from any one ethnic designation was tied between American Indian/Alaskan Native and Hispanic/Latino, where 67% of those that applied were successful.

Methods

A mixed method program evaluation pilot was used in order to determine the feasibility of a dual license program and determine if further research was warranted. The program evaluation research design was used to guide the decision-making process concerning dual licensure. Through the use of a pilot study, DCYF assessed and tested the strength and plausibility as well as the safety and feasibility of child placement in a dual licensed program, recruitment potentials, onboarding methods, and ongoing oversight. Pilot and ongoing planning was inclusive of considerations toward issues of racial equity and social impacts.

Specific data was needed to gather operational and validity data on the dual license operations. This provided decision makers with information necessary to determine if the program needs should be accepted, amended, or terminated. Specifically, the pilot gathered the data needed to identify discrepancies between actual implementation and intended design, and identify defects in the design or implementation plan.

Qualitative data was collected through strategically placed virtual interviews with a pre-determined script to volunteer providers: One was completed pre-participation regarding overall motivations and expectations and the second was delivered post-participation as a follow-up to assess if expectations were met and where additional areas of improvement are needed. Additionally, a monthly questionnaire of each volunteer provider was delivered for the purpose of continuous assessment of the various processes. The project

manager collected these monthly data and provided the results to the oversight committee surrounding provider feedback, conditions, and program elements as they occurred. The role of the oversight committee was to provide agency decision-making when needed and provide feedback on discrepancies.

Quantitative data included child care and foster care licensing and capacity changes, violations and intake/complaint counts, and valid outcomes of those inspections and assessment processes.

Both quantitative and qualitative analysis was completed at each level of the evaluation by the researcher and the management analyst in order to assess the outcomes of each question. Six research questions were developed to guide the measurement of outcomes:

1. What are the effects of dual licensing on rural and urban access to child care for foster children?
2. What are the effects of dual licensing on the rate of placement for children in foster care to families with immediate child care needs?
3. What are the policy outcomes surrounding the pilot for a dual license?
4. What are the financial implications of dual licensing to both the provider and DCYF?
5. What are the effects of a unified oversight system for dually licensed providers?
6. How does dual licensing affect the rate of provider licensing violations, valid complaint findings, and adverse actions?

Qualitative data was collected through pre and post-pilot interviews to assess provider expectations and effects surrounding the dual licensing process and delivery of foster care and child care services inclusive of motivation, understanding of child care access in the community, financial needs and barriers, the licensing technical assistance and monitoring process. Comparative coding summarized the results between the pre-pilot understanding of the motivations, expectations, and outcomes to that of post-pilot understanding based on completion.

Monthly provider interviews also collected qualitative data regarding the use and usability of onboarding, monitoring, and ongoing oversight and support processes; identifying areas for improvement as well focusing on ambiguities and misunderstanding around the pilot rules and oversight systems. Additionally, monthly provider interviews collected qualitative data regarding the use and usability of the child care subsidy supports as well as other foster care financial assistance and reimbursement systems.

Limitations and Dependencies

The pilot study was small in comparison to the total count of foster care and child care providers throughout the state. Therefore, feasibility results may not generalize beyond the inclusion and exclusion criteria of the pilot design. Pilot results were used to generalize expectations on a statewide level as well as test the feasibility of dual license recruitment, onboarding, and oversight systems as an innovative strategy to increasing out-of-home care options.

It was not possible to limit and control all changes within the application and oversight processes of child care and foster care for two years. Outside drivers such as implementing the foster care application into an online format, the redesign of the home study, court case rulings, and new outreach and recruitment processes may have had direct and indirect effects to the outcomes of this study.

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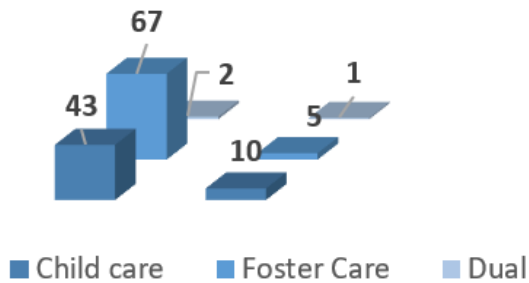
Additionally, due to the COVID-19 pandemic, the number of providers interested in holding more than one license is still largely unknown. Additionally, onboarding, technical assistance, and maintenance activities were largely limited to virtual communication whenever possible to limit staff and stakeholder contact. Throughout the duration of the pilot, the restrictions and policies regarding in-person activities changed as the statewide response to the pandemic adjusted.

Outcomes

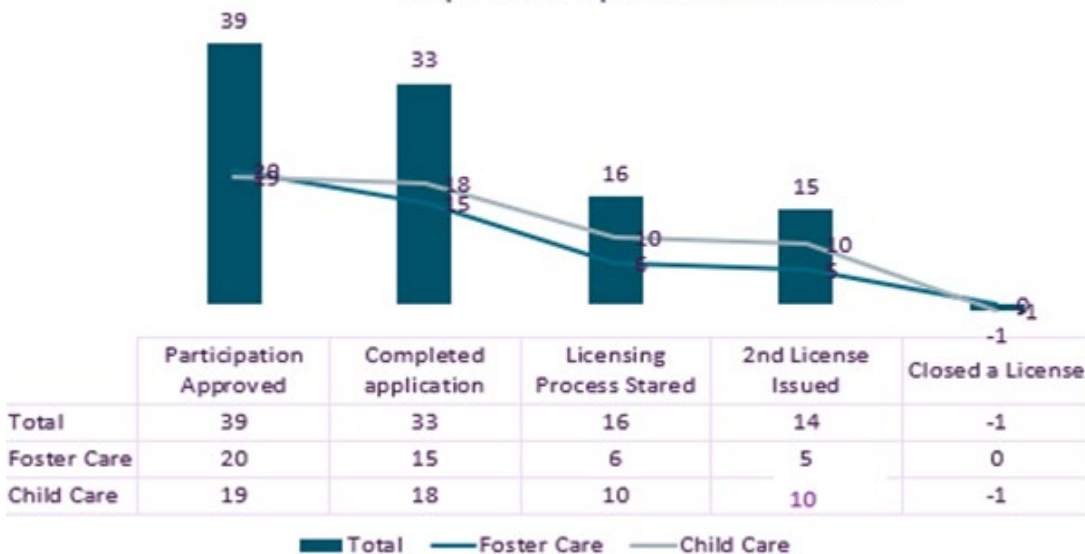
Research Questions 1 and 2: *What are the effects of dual licensing on rural and urban access to child care for foster children? What are the effects of dual licensing on the rate of placement for children in foster care to families with immediate child care needs?*

There have been 118 licensed providers statewide who expressed interest in becoming dually licensed. Of those that expressed interest, 43 were already licensed child care providers and 67 had a foster family home license (Graphic 1). Of those 43, 33 were accepted into the pilot. 15 providers became fully licensed with both a family home child care license and foster family home license (Graphic 2).

Graphic 1: Interest vs Success



Graphic 2: Completion Success Trends



To date, this has created 30 new child care spots and 19 additional placement options within communities. More specifically, throughout the pilot, 30 children were placed with dual licensed providers and 16 children were provided with respite care. Child care started with 98 child care spots within existing licenses. The pilot increased that capacity to 128 slots for an additional 27 children.

Throughout the dual licensed pilot, we have seen a slight general increase in child care and foster care services statewide. In fact, participant providers were not only willing to increase access through the additional license, they were also eager to adjust licensed capacities to accommodate the need of foster children in their own communities. Examples of this include increasing the age limit on their child care license or working for an overcapacity on their foster care license to accept siblings (six modifications and six overcapacities). In a few cases, providers are working with contractors to adjust their homes for the sole purpose of increasing child care or foster care capacity.

However, the full potential to increase capacity is yet to be realized because the pilot was very short-term, starting the summer of 2020 and concluding June 2022. These years were also significantly impacted by the COVID-19 pandemic. Because of these circumstances, it is impossible to understand the full impact and implications of allowing both foster family home and child care licenses with regard to capacity increases compared to non-pandemic years. Nonetheless, it is anticipated that dual licensed providers will increase as COVID-19 concerns diminish.

The pilot demonstrated benefits beyond an increase in capacity numbers. Being able to receive child care in their own home allows foster children to experience fewer transitions and the ability to stay in familiar, stable environments. Additionally, new child care facilities were able to offer available spots to other children in their communities. In some instances, having both the foster care and child care license offered unique opportunities for keeping families and communities connected that would not have been possible outside of the pilot program.

For example, one provider came to the pilot with a family home child care license. Enrolled in their program was a three-year-old boy who was also experiencing out-of-home care with a different foster family. The little boy's infant sister had recently entered the foster system and unfortunately, the boys' foster family was unable to take her under their foster care license. In an effort to keep the siblings together, the child care provider applied for a foster care license through the dual license pilot. After becoming dually licensed and expanding the age range on the child care license, this provider received placement of the infant sibling in September. Having both licenses allowed the siblings to be together every day during child care hours. This provider also coordinated visits for the infant with the foster parent of her sibling on the weekends. The placement provider (not the dual license provider) of the boy is in the final stages of adopting him and once complete, will receive placement and pursue adoption of the infant sibling. Although the infant will be transitioning to placement with her sibling, both children will continue to receive child care services with the dually licensed provider.

Research Question 3: *What are the policy outcomes surrounding the pilot for a dual license?*

Through the initial WAC crosswalk, it was discovered there were very little rules that conflicted with the practice of dual licensing. In fact, the impacts were so minimal, it was decided early on that each license would remain independent of one another. There were three key consideration leading to this:

1. Foster care Title IV-E funding is dependent of providers being held to only one set of standards across all providers. This restricted the ability to combine rule chapters for these providers.
 - i. Crosswalk of both child care and foster care rules demonstrated no major conflicts between both chapters.
 - ii. Workgroup recommended and Steering Committee approved maintaining current and separate WAC chapters rather than creating a separate pilot set of a unified rule chapter.
2. Interpretation of capacity regulation did not specifically outline the need to restrict capacity to the most restrictive. Through the policy analysis, it was discovered this practice was more related to interpretation and former agency culture.
3. Because licenses remained independent of one another, only a few guidelines needed to be put into place:
 - i. Child Care rules only apply during child care hours, while foster care rules were to be followed at all times.
 - ii. When one set of rules were more restrictive or a higher duty to the provider, that rule needed to be followed.

Foster care licensees who hold a child care license or any other license cannot be held to different standards than foster care licensees who only hold a foster care license. Therefore, foster care licensees must follow the foster care WAC and all foster care policies and procedures 24 hours a day, seven days a week. We also found that that foster care WAC is stricter than child care WAC in two areas (medication and firearm storage). This does not pose any conflict because the stricter foster care WAC is followed 24 hours a day, seven days a week, including during child care hours. In response to these findings, we made WAC recommendations to remove administrative approval barriers and capacity interference. The intent is to be clear that holding more than one license is allowable, that the foster care capacity does not interfere with or reduce the child care capacity, and that each license is issued and regulated according to its individual WAC.

Additionally, during the pilot, we created policies and procedures for how DCYF staff will handle specific situations; none for licensees.

Research Question 4: *What are the financial implications of dual licensing to both the provider and DCYF?*

From Jan. 1, 2021, to May 9, 2022, DCYF's subsidy department paid just over \$52,122.00 in child care expenses for children who were placed in a foster family home that also provided licensed child care. This included 14 children in out-of-home placement. It is important to note that most of the children involved in the pilot would have required child care services and would have been placed in a licensed child care program outside of the placement home. Therefore, it should not be considered an added subsidy expenditure because those payments would have simply moved from the dually licensed provider to a licensed child care provider and created further disruption to a child already experiencing removal from their family of origin.

Foster families also received license level reimbursement to support the individual daily care of the children placed in their care. A few providers also received respite payments during the pilot (financial support for a child's living expenses outside of child care services). Overall, we know that the financial resources provided during the pilot were key in the continued success of providers being able to offer both services. Additionally, throughout the pilot it was discovered that there is and should continue to be a distinction between a child care subsidy payment for children enrolled in a provider's home and a child welfare reimbursement. Simply stated, the reimbursement are funds meant to support a child's everyday expenses while child care subsidy payments are meant to pay for the service of quality licensed child care. However, the non-financial benefits, while not measurable, had a greater impact on families and communities within the pilot and will be discussed throughout the rest of this report.

"Both foster parenting and child care provider are TOUGH jobs. This little bit of compensation makes it a little easier to handle. No, we don't 'do this for the money,' but there are days it's not worth the headache either. These payments help ensure that our child care business is viable and can continue. This service is much needed in our community and we are trying to help out parents/families in our area by providing another option for child care."

Research Question 5: *What are the effects of a unified oversight system for dually licensed providers?*

The pilot demonstrated that there was more interest from foster parents wanting to get a child care license than child care licensees wanting to get a foster care license. However, we learned that child care licensees were, in general, more successful getting the foster license than the other way around – especially within the first nine month of the pilot. Mid-pilot we processed why that was and started to make some adjustments.

The first, and perhaps the most notable difference in the licensing process between the two is the fact that foster care is a service of volunteer individuals of which the state actively supports through the application process while child care centers are independently owned businesses whereby the duty is solely on the provider to complete the application. So, we shifted that thinking within the team and started focusing more efforts into the pre-licensing process for the pilot participants seeking a child care license.

Beyond that, we also noticed that foster parents came to the process expecting a similar process – there was an assumption that because they were already licensed, the addition of the new license would be somewhat "automatic." By increasing communication and screening, we were able to mitigate many of those expectations. Finally, it simply took more time for foster parents to prepare their homes to become early learning environments; therefore, we saw those numbers start to equalize past the midway point as those initially accepted into the pilot started to get their licenses.

Eighty-four percent of participants who completed the post pilot survey felt that the dual licensing pilot (DLP) staff were extremely helpful throughout the pilot. Pilot participants often identified a common hurdle to obtain a dual license to be the lack of clarity and resources to navigate licensing process. The participants also responded that they did receive the assistance they required to complete the licensing process, and their questions were answered by the dual licenses pilot staff to the satisfaction of the pilot participants.

Perhaps the largest outcome concerning this question is the collaboration that has taken place between child care and foster licensing systems and teams. By increasing coordination between foster care and child care

licensing systems providers seeking a second license were able to minimize their contacts with varying licensing personnel and experience high levels of coordination and supports. The dual license team collaborated to support families and in general, staff across all programs reported that the pilot (including both licensing systems) was easier to navigate due to having one main point of contact for the entire program.

Research Question 6: *How does dual licensing affect the rate of provider licensing violations, valid complaint findings, and adverse actions?*

When considering child care licensing violations, there are two different violation data considerations; violations found during the monitoring visits and violations found to be valid during a complaint inspection. Family home child care providers statewide had an average of five violations per visit between July 1, 2021, and June 30, 2022. Dual licensing participants during the same time period demonstrated an average of 1.14 child care licensing violations during any monitoring visit (initial, initial-to-full, or annual inspections), demonstrating fewer licensing violations overall.

Foster care licensing violations are more difficult to compare year-to-year as foster care homes are less likely to experience a monitoring visit post-licensure. DCYF is only required to monitor a random 10% of all homes throughout the state annually. Ultimately, no pilot homes were selected during the brief pilot, and therefore no foster care licensing violations were found during the pilot for providers dually licensed.

During the short tenure of the pilot, there was only one complaint with the dual license providers¹ (specific to the foster care license), and it was found to be not-valid (meaning the provider did not break any rules). Because there were no complaint findings, founded CPS investigations, or serious injuries during the pilot for providers holding both licenses, it is not possible to measure the health and safety outcomes for children in dually licensed homes to the health and safety outcome of children in other environments. Therefore, there are no reasonable data to support any claims that providers with more than one license will draw a higher level of complaints or experience higher levels of injuries or harm to children than providers with only one license.

Discussion and Recommendations

The purpose of this pilot was to provide services and coordination that support the children and families served in licensed care settings, which increases and stabilizes foster care licensed providers, increases the ability to serve children and families in culturally responsive settings within their home community, and creates a system of care that bridges early learning and foster care. It is recommended that the providers are not only allowed to carry multiple out-of-home care licenses, it is also highly recommended that DCYF remove any historic or remaining barriers, making the ability to hold multiple licenses more accessible and affordable.

Overall Benefits

The pilot demonstrated that there was more interest from foster parents wanting to get a child care license than child care licensees wanting to get a foster care license. We learned that child care licensees were, in

¹ One foster care provider applying for the child care license experienced a child fatality prior to a child care license being issued or child care services provided and therefore cannot be considered a variable within the dual license pilot.

general, more successful getting the foster license than the other way around – especially within the first nine months of the pilot. Mid-pilot, we processed why that was and started to make some adjustments.

The first, and perhaps the most notable difference in the licensing process between the two is the fact that foster care is a service of volunteer individuals of which the state actively supports through the application process, while child care centers are independently owned businesses whereby the duty is solely on the provider to complete the application. So, we shifted that thinking within the team and started focusing more efforts on the pre-licensing process for the pilot participants seeking a child care license.

We also noticed that foster parents came to the process expecting a similar process – there was an assumption that because they were already licensed, the addition of the new license would be somewhat “automatic.” By increasing communication and screening, we were able to mitigate many of those expectations. Finally, it simply took more time for foster parents to prepare their homes to become early learning environments; therefore, we saw those numbers start to equalize past the midway point as those initially accepted into the pilot started to get their licenses.

By addressing and removing the identified barriers for providers to hold multiple DCYF licenses, the dual license pilot provided children in or entering the foster care system with additional opportunities for increased continuity of care. Children in dually licensed homes experienced decreased transitions. For example, children in foster care are supported in remaining in the caregivers’ home to meet their child care and early learning needs. This in and of itself provides children with security of care and allows a bond to form and strengthen with their caregivers while placed outside of their parent’s care. The dual license pilot also permits children to maintain existing and/or family relationships with kin, who are also child care licensed. With the dual license, these kin can obtain the foster care reimbursement for the child’s care. The foster care reimbursement provides financial support to kinship caregivers who are caring for their relatives.

For example, a set of grandparents had their grandson placed with them when he was a year and a half old. Because the grandmother had an existing child care license, she could not move forward with foster care licensure when he was placed, as under non-pilot rules, her child care capacity would be limited to her foster care capacity, which would have been four children. This was a grandmother who had owned and operated her child care business for over 20 years. Limiting her child care capacity to four children (rather than 12), would have significantly impacted her business, making becoming foster care licensed to support her grandson under non-pilot rules not feasible. She and her husband cared for their grandson for 33 months as unlicensed caregivers. Ultimately, they joined the dual license pilot and became foster care licensed to provide ongoing care and support to their grandson, which made them eligible to receive the foster care reimbursement and didn’t limit their child care capacity.

The dual license pilot also provided stability of pathways to permanency for children in out-of-home care: It allowed stability in the form of consistent caregivers as children achieve permanency. Permanency can look different for each child in care. An example of how the pilot created stability involved a multi-licensed provider taking placement of a child on a voluntary placement agreement. The child was in the provider’s home for nearly 60 days. Upon the child’s return home to the bio-parent, the bio-parent learned the foster home was also licensed for child care. The bio-parent elected to re-enroll her child into the provider’s child care, where the child could continue their relationships while receiving child care. The multi-licensed provider then became a stable support to not only the child, but the parent by expanding their support network.

The multi-license pilot systematically and naturally builds a community of practice in both our agency work and in the work of the participants. Child care and foster care licensing teams have been able to establish a stable and supportive community that collaborates regularly to share information, create new and innovative ideas, and solve problems quickly and effectively. Likewise, the dual license providers meet regularly and support one another in peer support roles and mentorship and work together to dispel myths around out-of-home care services.

For example, one couple entered the pilot holding a foster care license with a capacity of two children. Prior to being foster care licensed, they were child care licensed but had closed that license to pursue being foster parents. The couple has in-depth and unique knowledge of maintaining both licenses. As foster parents, the couple has personally experienced the hardship of finding child care for their own foster children. They found child care providers are often skeptical to take on children in foster care because there is often an uncertainty of how long they may or may not stay in care, the state payments may be too low, or a general fear of the behaviors these children may present. With their new child care license, the couple hoped to dispel myths and fears while increasing services to their own community by offering quality child care. In fact, one member has become a mentor for other providers wanting to obtain multi-licenses and now leads the community of practice within the multi-license participant community where they are able to support each other in providing for the holistic needs of the children.

Ongoing Work

Post-pilot work continues to remove barriers as the multi-licensing team explores how to move this pilot into permanent practice in January 2023. Several key planning strategies are in place and being explored, refined, or developed:

1. Rule changes to child care, foster care, and potentially subsidy WAC.
2. Provider training and orientation alignment that will ensure providers are not being overtasked with professional and training development.
3. Initiate child welfare and licensor training co-design that will break down myths and barriers toward the placement and approval of multi-licensed providers across the state.
4. Create partnership and coordination with foster families working through child placement agencies.
5. Tribal partnership and opportunities to increase dual licensing in underrepresented communities.
6. Information technology adjustments that will allow for easier identification and tracking of provider licensing and subsidy activities.
7. The establishment of a shared governance process whereby foster care assessment, foster care safety and monitoring, licensing division child protective services, and child care licensing share authority when decisions around dually licensed providers are needed. This allows us to continue to work together, aligning priorities, creating a culture of mutual responsibility, and establishing a system of checks and balances to ensure DCYF achieves its mission and vision.

Subsidy: The Remaining Barrier

Despite this pilot ending June 30, 2022, we do not yet have a final commitment to continue making child care subsidy payments (beyond December 2022) to people who are both a child's placement location and a

licensed child care provider. While providers will continue to be allowed to have easier access to carrying multiple care licenses through licensing WAC revisions and coordinated licensing processes, the largest barrier to increasing this access is the loss of child care income when a foster child is also placed in the same home or center where child care services are being provided.

Working Connection Child Care Subsidy funded through Child Care and Development Fund (CCDF) is not currently an option for funding these subsidy payments to providers who are also the foster placement for children in their care. This is due to federal guidelines considering foster parents to be “in loco parentis” and therefore considered the child’s parent (even when it is temporary). However, it is our proposal that children who are not the provider’s own children (either biologically or adoptive) but are in full-time out-of-home care (foster) with a licensed child care provider are formally in custody of the state rather than the individual and therefore, should qualify for state subsidy assistance when the child is enrolled in that facility. For providers with both child care and foster care licenses, the dual license pilot helped to alleviate the struggle of finding licensed child care for the children placed in their home while also easing the financial burden of maintaining their child care income. Here are a few statements from the pilot participants:

“The child care payment for foster/respice kiddos makes it possible for our business to remain viable while serving both licenses. Receiving the child care payment for the child care services performed is absolutely a requirement as far as I’m concerned. We have actually had placements enrolled in another child care (center) instead of ours (because they were enrolled before being placed here and because they had an existing relationship with providers). Since we knew it was short-term, we didn’t disrupt that. When we take placement/respice, we are requiring the social worker to authorize child care too — otherwise it takes spots from paying customers.”

“It would be entirely impossible for me to provide in-home child care if child care payments for my foster children were to stop. I have four young children (foster placements) in my home. Prior to being able to be a licensed child care provider, I was working in an office setting. I was driving to two daycares every day. It made the days for my kids extremely long, and at least one day a week, one of the child care centers was closed/short-staffed or a child was sick, causing me to lose work hours and putting my ability to be a consistent caregiver and being able to pay my bills in jeopardy.”

“When I opened child care in my home, the cost of child care merely transferred from the daycares they were attending to this current one they attend in my home. I am now licensed for 12, allowing me to provide care for eight additional community children and freeing up 12 spots in other centers. I also am paying a staff member anytime more than six children are present. Without the child care payments, it would be unaffordable to continue. The staff member would lose employment, and all the kids attending care would be forced to look for other arrangements.”

Additionally, the process of getting child care subsidy payments to dually licensed child care providers (i.e., those licensed for both foster family home care and early learning licensed services) has been somewhat challenging. While the pilot project manager has been getting the information to the subsidy team, finance

cannot process payments without the service referral requests from the child welfare caseworker. The pilot process identified multiple issues that created this barrier:

1. Most caseworkers have been trained to believe they cannot approve child care payments for foster families that keep their placements in their family home child care. In fact, many caseworkers may not even know what it means to be licensed to provide child care.
2. FamLink is not programmed to allow providers to hold multiple DCYF licenses. Accordingly, the dual license pilot program created a workaround to supply providers with two separate provider numbers (one for each type of license). This set up takes manual coordination from Fiscal to monitor the payments. Additionally, there is no option in FamLink to track dual licenses. Under the pilot, dual licenses required tracking via spreadsheet outside of FamLink.

Summary

By removing barriers to the practice of holding multiple licenses issued by DCYF, along with the commitment to continue to use state funds to subsidize child care for foster children in multi-licensed programs as well as the continued development of intentional systems, policy design, and coordinated support systems, we can ease access of existing out-of-home care providers to expand their services to include either licensed child care or foster care placements. Allowing a placement provider to also provide child care to the foster children in their care 1) increases avenues and access to recruit foster care placement options; 2) supports placement of children with licensed kinship caregivers, which eases financial burdens for those kinship caregivers and improves outcomes for children; 3) increases avenues and access to recruit more quality child care providers and increase the availability of child care; and 4) increases and supports the community around children in out-of-home care, which increases that child's support and stability.

Appendix A: Project Charter

Dual License Pilot	Foster and Child Care Dual Licensure: Early Learning and Foster Care		Start Date: 7/1/2020					
			Complete by Date: 6/30/2022					
			Revised Date: 9/23/2020					
Description	Project Purpose	<p>Outlined in House Bill 2619, the Department of Children, Youth, and Families will conduct a pilot study to develop intentional policy and structural design to assess the success and challenges of dual licensure inclusive of child care and foster care. This pilot will develop systems and policies that will increase accessibility for individuals to receive a combined foster care and child care license. The purpose of conducting a dual license pilot research study is to explore the effects to foster care placement and the correlation of child care availability specific to foster children while evaluating the efficiency and effectiveness of a dual-purpose oversight system.</p>						
	Project Description	<p>A mixed method program evaluation pilot will be used in order to determine the feasibility of a dual license program and determine if further research is warranted. The program evaluation research design will be used to guide the decision-making process concerning dual licensure. Through the use of a pilot study, DCYF will assess and test the strength and plausibility as well as the safety and feasibility of child placement in a dual licensed program, recruitment potentials, onboarding methods and ongoing oversight. Pilot planning will be inclusive of considerations toward issues of racial equity and social impacts.</p>						
	Desired Outcomes	<ul style="list-style-type: none"> Increases accessibility of child care in areas where child care has been identified as a barrier for foster care placement. Successful oversight processes for dually licensed programs 						
	Deliverables	<p><i>A deliverable is any unique and verifiable product, result or capacity to perform a service that is required to be produced to complete a process, phase or project. Deliverables are typically tangible components completed to meet the project's desired outcomes and can include elements of the project Work Plan.</i></p> <ul style="list-style-type: none"> Collaborate with provider community to ensure holistic input and nurturing partnerships. Completed set of Pilot WAC, for a dual licensure Streamlined onboarding process inclusive of orientation, application and training requirements for ease of access and ensuring reliable data collection. Recommendations for programmatic structure and field processes Ensure participants are able to receive federal funding 						
	Alignment with Agency Priorities	<p>Check all that apply:</p> <table border="0"> <tr> <td><input type="checkbox"/> Create high quality, integrated B-5 system</td> <td><input checked="" type="checkbox"/> Improve quality & availability of provider services</td> </tr> <tr> <td><input type="checkbox"/> Reduce rate of children in out-of-home care</td> <td><input type="checkbox"/> Create successful transition into adulthood</td> </tr> <tr> <td><input checked="" type="checkbox"/> Improve quality & intention of our practice</td> <td><input checked="" type="checkbox"/> Aligns with Division or Program Goals</td> </tr> </table>		<input type="checkbox"/> Create high quality, integrated B-5 system	<input checked="" type="checkbox"/> Improve quality & availability of provider services	<input type="checkbox"/> Reduce rate of children in out-of-home care	<input type="checkbox"/> Create successful transition into adulthood	<input checked="" type="checkbox"/> Improve quality & intention of our practice
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<input checked="" type="checkbox"/> Improve quality & intention of our practice	<input checked="" type="checkbox"/> Aligns with Division or Program Goals							

DUAL LICENSE PROGRAM EVALUATION PILOT STUDY

Scope	<i>Includes</i>	<ol style="list-style-type: none"> 1. One additional FTE (MA4 – project management) \$250,000 was allotted in the budget bill for the position. 2. Pilot rule development 3. Policy and procedure development
	<i>Excludes</i>	<ol style="list-style-type: none"> 1. IT infrastructural development/not necessary during the pilot 2. Additional line or supervisory staff

	#	What	When
Milestones	1	Oversight committee – approve pilot structure and planning and provide general decision as needed	August, 27, 2020 and ongoing
	2	Input – the focus groups will collaborate to complete all necessary pilot rules, systematic recommendation, protocols, and baseline processes need to begin the pilot	November 13, 2020
	3	Racial Equity and Social Justice collaboration with stakeholders and analysis	November 20, 2020
	4	WSIRB approvals	November 20, 2020
	5	Completed recruitment	January 1, 2021
	6	Pre-survey completed	January 22, 2021
	7	Onboarding Completed	May 1, 2021
	8	Legislative report	July 1, 2021
	9	Primary monitoring – data gathering	May 1, 2022
	10	Post survey completed	June 1, 2022
	11	Product recommendation finalization – oversight committee	June 31, 2022
	12	Final legislative Report	November 1, 2022

	#	Risk	Prob	Impact	Strategy
Risks	1	Budget: Potential cuts caused by the Covid-19 crisis may limit funding	H/M/L	H/M/L	LD will explore alternative funding sources available to support the financial need of this project for the two-year project.
	2	Participation Recruitment Limitations	H/M/L	H/M/L	It is possible there will be little interest in volunteers to work within the pilot of two licenses. The focus groups will need to explore possible incentives. In addition, the methodology will need to consider very small data sets and prepare for reporting the limitation.

DUAL LICENSE PROGRAM EVALUATION PILOT STUDY

	3	Research approvals through OIAA and WSIRB	H/M/L	H/M/L	The highest impact would be timing implications waiting on approvals and potential revisions. This will require the process be started as early as possible. While approvals are pending the context and input phases can move forward.
	4	Covid-19 Impact	H/M/L	H/M/L	Due to the Covid-19 pandemic, many licensing processes have been moved to a virtual format to protect staff and families from exposure. Whenever possible, this pilot will require personal contact with clients, therefore, it will be imperative that staff working on this project and volunteers are comfortable and capable of in-person contact during the pilot. When contact is not possible, the study will take into consideration and plan for alternate methods of contact and monitoring and subsequently, be transparent about the limitations within the findings.
	5	Union Impact	H/M/L	H/M/L	SEIU and WFSE will be notified and be consulted prior to the pilot phase of the study.
	6	Information Technology Impacts	H/M/L	H/M/L	In order to effectively manage a case of one provider with two services will require either one technology system that can manage all services provided or two systems that can share and connect case management. While the impact for the pilot is low the pilot will allow this to be explored while maintaining data in current systems and anecdotally ensuring data is cross collected. As the pilot will not be dependent on a unified system the impact will be low.

	Item or Project Phase	Projected Cost	Fund
Project Budget	Project management FTE	\$250,000 was allotted in the budget bill for the position.	General
	Travel (oversight, meetings, etc.)	Included in the FTE	General
	Focus group meeting costs (i.e. rental, per diem, etc.)	\$0	N/A
	Translation Services	TBD	General

	Role	Person(s)	Responsibility
Roles & Responsibilities	<i>Sponsor</i>	Luba Bezborodnikova	<ul style="list-style-type: none"> • Provide leadership and resources to achieve the project desired outcomes • Facilitate Executive Steering Committee • Approve, communicate, and support implementation

DUAL LICENSE PROGRAM EVALUATION PILOT STUDY

	<p><i>Process Owner/Research Manager</i></p>	<p>Sonya Stevens</p>	<ul style="list-style-type: none"> • Provide oversight, supervision and support to the project manager • Assist in the pilot development as needed to ensure research protocols are maintained • Collaborate with the project manager to develop data collection tools • Collaborate with OIAA in regards to data collection, governance and integrity • Submit required forms and follow up to the Washington State Internal Review Board (WSIRB) • Collaborate with appropriate departments to deliver recruitment materials, conduct recruitment and consent documentation as outlined in the pilot methodology
	<p><i>Project Manager</i></p>	<p>Michelle Giard</p>	<ul style="list-style-type: none"> • Ensure the decision-making process is followed and the project follows the projected timeline • Ensure necessary people are involved at the appropriate times. • Provide guidance and information to all levels of development and delivery • Collect, organize and report all recommendations and decisions needed for the dual license pilot • Collaborate with the various development teams to ensure deliverables or met • Assist the research manager in recruitment, participation selection and data gathering as outlined in the pilot methodology • Collaborate to create written and oral reports to the various internal and external stakeholders including legislative updates and recommendations
	<p><i>Executive Steering Committee</i></p>	<p>Travis Hansen Ron Effland Pam McKeown</p>	<ul style="list-style-type: none"> • Provide final business decisions • Provide any emergent support to the project manager

DUAL LICENSE PROGRAM EVALUATION PILOT STUDY

		Ruben Reeves	<ul style="list-style-type: none"> • Approve final communication strategies and messaging
	<i>Bill Governance</i>	Genevieve Stokes	<ul style="list-style-type: none"> • Coordinate and communicate with the process owner and project manager in regards to bill implementation timelines and communication with legislature
	<i>Change Management</i>	Brett Skinner Ann Radcliffe	<ul style="list-style-type: none"> • Provide consult and support to identify stakeholders, perform readiness assessments, and advise on the organizational change management plan for the project • Act as official member of the project team or an external resource to the team and the project manager • May provide “just in time” change management training or change management tools for the project manager, team, and sponsor
	<i>Oversight Team</i>	Travis Hansen Pam McKeown Ruben Reeves Ron Effland Rebecca Taylor Nicolas Harris Mike Canfield SEIU TBD Regan Henry	<ul style="list-style-type: none"> • Maintain accountability for timely & quality completion of assigned tasks • Discuss and agree on business decisions
	<i>Pilot Rules and field operation system work groups</i>	Tyler Farmer/Eva Freimuth Karen Christensen/Amber Salzer	<ul style="list-style-type: none"> • Participate fully and collaboratively as a subject matter expert and member of the project team • Analyze current practice against best business practice • Identify business requirements, ensuring regulatory compliance • Identify policy, process, and practice gaps

DUAL LICENSE PROGRAM EVALUATION PILOT STUDY

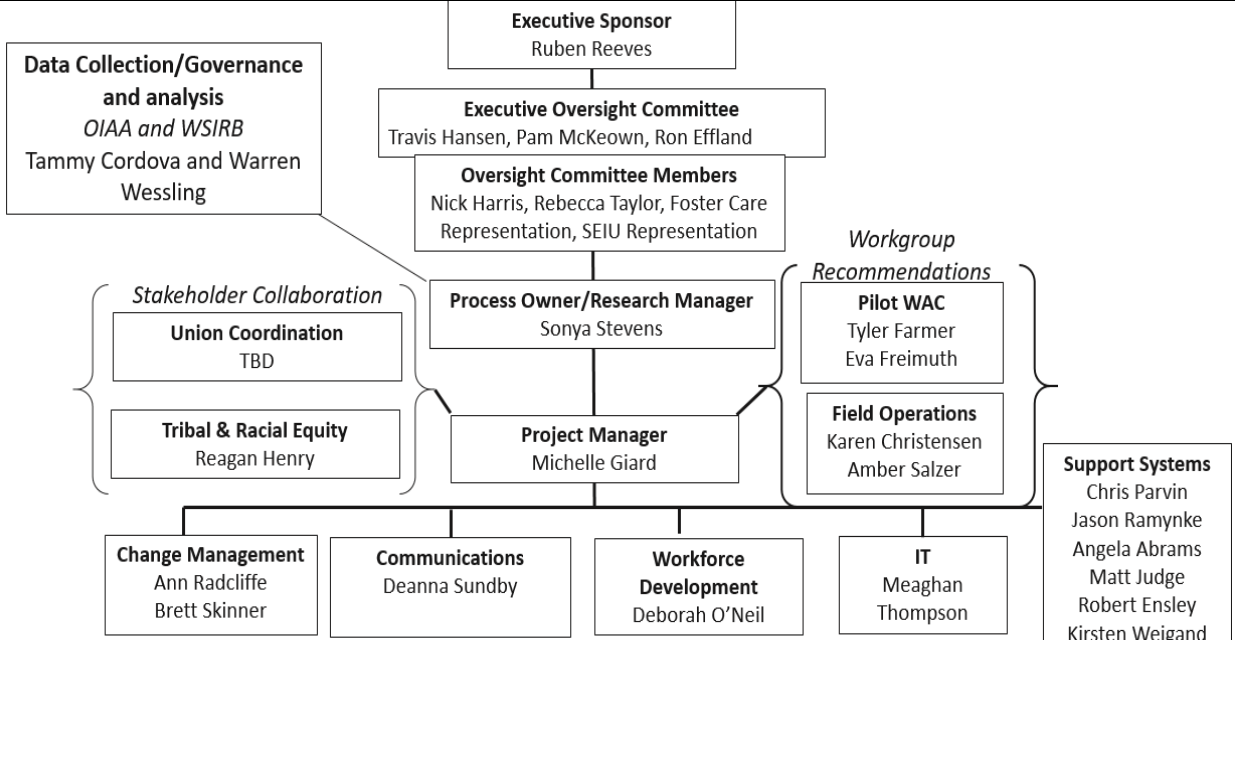
			<ul style="list-style-type: none"> • Work collaboratively to identify the best improved process DCYF can successfully adopt • Identify solutions and make recommendations that support the process of dual licensing
	<i>Communication</i>	Deanna Sundby	<ul style="list-style-type: none"> • Work with project management to create key messaging to internal and external stakeholders • Assist with any statewide virtual dual licensing informational sessions • Coordinate with DCYF office of communication for stakeholder messaging and recruitment
	<i>Tribal Coordination and RESJ</i>	Regan Henry	<ul style="list-style-type: none"> • Identify coordination and communication strategies with tribal representatives during the planning and reporting phases of the pilot • Coordinate with the RESJ committee to review of dual license materials to identify concerns and needed adjustment and clarification concerning racial equity and social justice
	<i>Workforce Development</i>	Deborah O’Neil	<ul style="list-style-type: none"> • Work in collaboration with the project management and other key stakeholder to review training materials to develop: <ol style="list-style-type: none"> 1. Orientation materials 2. Ongoing professional development planning for dual license providers 3. Licensing staff training materials
	<i>Information Technology</i>	Meaghan Thompson	<ul style="list-style-type: none"> • Identify areas within the current case management IT systems for dual licensing case management • Consult on methods concerning data integrity • Make recommendations for IT needs

DUAL LICENSE PROGRAM EVALUATION PILOT STUDY

	<p><i>Support system development SMEs</i></p>	<p>Chris Parvin Jason Ramynke Angela Abrams Matt Judge Robert Ensley Kirsten Weigand</p>	<ul style="list-style-type: none"> • Identify and consult on background check processes and identify electronic mechanisms to track background check results for a dual licensed provider in one location • Identify and consult on the development of child care subsidy payments and reimbursements including processing payments • Consult and collaborate on an aligned professional development plan for dual license providers • Identify, assess and provide recommendations in the area of meeting federal requirements, guidelines and funding requirements throughout the entire dual license process. • Identify and consult on child care subsidy and foster care maintenance and child care reimbursements.
	<p><i>Data Governance</i></p>	<p>Tammy Cordova Warren Wessling</p>	<ul style="list-style-type: none"> • Review data collection methods and materials for OIAA approval for WSIRB submission • Provide consultation and support with the collection of child welfare specific data collection • Provide consultation and support for data collection specific to child care subsidy

DUAL LICENSE PROGRAM EVALUATION PILOT STUDY

Project Governance Flow Chart



Decision Making Matrix

