



POLICY ADVISORY

Policy Title: Interim Income Eligible and Department of Transitional Assistance (DTA) Child Care Financial Assistance Policies

Policy Number: CCFA-25-03

Release Date: 3/18/2025

Effective Date: 4/1/2025

Policy Link: [Child Care Financial Assistance: Policy, Guidance and Resources | Mass.gov](#)

OVERVIEW

EEC continues to actively make changes to the State's Child Care Financial Assistance programs to align with the revised Child Care Financial Assistance Regulations (606 CMR 10.00) that went into effect October 1, 2023.

EEC issued the Interim Income Eligible, Department of Children and Families (DCF), and Department of Transitional Assistance (DTA) Policy Guides effective as of 10/1/2023, in anticipation of additional updates and further changes necessary for full implementation of the policies. These interim policies remain in effect, in addition to other supporting Child Care Financial Assistance policy advisories. This policy advisory operationalizes more of those regulation and policy changes, including the provisional policy for families seeking child care financial assistance and families who need extra time to provide documentation to qualify for a 12-month approval for child care financial assistance, and how to qualify under several service needs.

APPLICABILITY

These policies apply to all Family Access Administrators (FAAs), a person or organization conducting eligibility for Child Care Financial Assistance such as Child Care Resource and Referral agencies, and contracted providers.

KEY UPDATES

INCOME ELIGIBLE UPDATES

- **Provisional/Seeking Approved Activity authorization change**

Effective April 1, 2025, the provisional authorization period will change from 26 weeks with unlimited renewals to one or two 12-week periods within a 12-month authorization, depending on circumstances.

<i>Families with a Provisional Authorization/Seeking Approved Activity that...</i>	
Started before 4/1/25	Stay on their 26-week Provisional Authorization until it ends, then the new 12-week provisional policy rules will apply to them, if they do not meet another service need.
Starts on or after 4/1/25	New policy applies: they may receive a 12-week Provisional Authorization, if they do not meet another service need.

▪ **Provisional/Seeking Approved Activity policies**

Effective April 1, 2025, Income Eligible families seeking initial authorization or reauthorization approved on or after April 1, 2025 may receive a 12- week provisional/Seeking Approved Activity authorization. New families must verify their identity, residency, and household composition to be presumed eligible for child care financial assistance through a provisional authorization. Presumptive eligibility is a temporary status given to a family who is assessed to meet the minimum eligibility requirements for child care assistance based on initial screening. This status allows some families to start receiving assistance for child care while searching for an activity or gathering additional service need documentation, if they are unable to provide it within 30 days of applying for Child Care Financial Assistance.

Any family who was approved for a 26 week provisional authorization prior to April 1 will remain until their reauthorization. At that time, they may be eligible for a 12- week provisional/Seeking Approved Activity authorization, if they do not have a service need.

A provisional authorization only applies to families presumed eligible for child care financial assistance without a service need, or needing more time to verify their service need. A family must be given 30 days to provide all eligibility documentation to qualify for a 12-month authorization. The provisional authorization must not be authorized prior to the 30 day period. A family must be issued a 12 month authorization as soon as all documentation has been provided and the FAA must process the application for child care financial assistance within 10 days of receipt of the documentation.

At the end of the initial 12-week provisional period, a family may receive an additional 12 weeks **only** if they are able to verify a service need (other than “Seeking Approved Activity”) will begin before the end of that second provisional period. For example, a parent may be between spring and fall semesters in school and the registration period to enroll in classes has not started yet, but will within the second 12-week period.

If the family is unable to fully verify their eligibility for Child Care Financial Assistance by the end of their provisional period, the placement will end. A family has up to 30 days from the placement end date to reopen their Child Care Financial Assistance, if they are able to provide all missing eligibility documentation. If the family does not provide this within 30 days from the placement end date, their Child Care Financial Assistance will end. A family would need to request Child Care Financial Assistance through the Waitlist after that time.

If all documentation is provided prior to or by the end of the provisional period, the family's Child Care Financial Assistance will continue until the end of the 12-month authorization period for which the provisional authorization was previously issued.

Additionally, this policy applies to two-parent households, where one or both parents may need a provisional period for a total of two for the household during a 12-month authorization period.

Provisional authorizations are not to be used for the following reasons:

- To combine with employment of 15 hours or more
- To expedite approval for Early Education and Care staff
- For Parental Leave
- For an activity or work verified to start within 30 days

Provisional authorization/Seeking Approved Activity may only be used when any activity, or combination of activities, is less than 20 hours per week to allow parents to increase their hours or meet another service need for continued eligibility. Seeking Approved Activity may only be combined with other service need activities when the other activities account for an average of less than 15 hours per week. Additionally, combining Seeking Approved Activity with other service need activities may only be used to grant a family a 12-week provisional authorization.

The only exception is parents with a service need of employment only, or a combination of employment and education and/or training equal to at least 15 hours but less than 25 hours weekly. Parents meeting this exception are eligible for a new service activity called Pathway to Full-Time Employment which will be included as part of their service need. See Service Needs Updates below.

▪ **Income and Parent Fees**

If the household has countable income when a provisional authorization is entered with Seeking Approved Activity, the income must be entered and a parent fee assessed, if applicable. Once the family provides the required information to continue the authorization beyond the provisional period, the most current income information must be entered into the CCFA system. As a reminder, once a parent fee has been established for an authorization, it cannot increase until the next reauthorization. Note: Parent fees are no longer waived on provisional authorizations.

▪ **Change Reporting**

Parents who have a loss of service need during a 12-month authorization period may have their activity changed to Seeking Approved Activity for 12 weeks. Each parent may be allowed one additional provisional **only** if they have proof that they will be starting an activity before that second 12-week provisional period ends. Once a family can verify that their activity will start in the next 30 days or sooner, the service need activity must be updated and the existing 12-month authorization may continue. After that, the family

would not be eligible to use Seeking Approved Activity again until their next 12-month authorization begins.

- **Reauthorization**

If a family does not complete the reauthorization process and their child care authorization ends, they have 30 days to provide any missing documentation to have their Child Care Financial Assistance reopened and reauthorized if they continue to meet all other eligibility rules. After 30 days from the authorization end date, a family must be placed back on the Waitlist. As a reminder, EEC will not reimburse for care provided without an active placement for Child Care Financial Assistance.

DEPARTMENT OF TRANSITIONAL ASSISTANCE UPDATES

- **DTA Seeking Approved Activity**

Families active on TAFDC may be referred to a CCRR with a DTA referral for Seeking Approved Activity. This referral type will authorize families for 12 weeks only. DTA must provide a new referral for TAFDC Approved Activity for a new authorization to be completed for 12 months.

- **Transitional Child Care**

For former TAFDC families who are moving from a DTA Approved Activity authorization or accessing Child Care Financial Assistance within 24 months of their TAFDC closing, DTA will confirm that parents are participating in an allowable service need activity when issuing a Transitional referral.

FAAs will verify the parent's service need activity as part of the eligibility for DTA Transitional Child Care. In two parent households, both parents must meet the eligibility rules. If the household has countable income, it must be entered. Families who are in their first year of Transitional Child Care will continue to not have a parent fee.

If the parent does not have an activity at the time they are being assessed for Transitional Child Care, they will be eligible for provisional authorization. If a former TAFDC family does not meet the service need rules and their child care placement is ended, they would continue to have up to 24 months from their TAFDC case closure to access care with an eligible service need.

SERVICE NEED UPDATES

Service need refers to the reason a family has for needing child care and includes the number of hours a parent is participating in an approved activity. The following are updated and new service needs that serve as an approved activity:

- **Pathway to Full-Time Employment**

Pathway to Full-Time Employment is a new service need that acknowledges the different ways employed parents may be working towards full-time employment, such as job training, education, and internships. Pathway to Full-Time Employment also allows for parents to work towards increasing their hours or finding more stable employment.

When parents are working, or working in combination with education and/or training, for at least 15 hours, but less than 25 hours per week, with no other allowable service need activity, FAAs may add on this service need to provide a 12-month authorization for full-time child care. If the current authorization includes Pathway to Full-Time Employment as a service need, this service need may not be used as a service need at the next reauthorization. Travel time should be offered and included if applicable.

Families must provide documentation that reasonably establishes the parents' hours and wages of employment and other service need. As a reminder, parents may provide proof of their weekly hours and earned income from within the last 26 weeks that they feel is most reflective of their employment. College, education and training hours are calculated based on the verified class, clinical, college credit or work study hours. FAAs should refer to Interim Income Eligible Child Care Financial Assistance Policies for additional details about calculating hours.

- **Protective**

Protective is a new service need that acknowledges other challenges that may be getting in the way of a parent being able to work or their family's stability. This service need is for a parent who is experiencing, or has experienced, domestic violence or who is participating in substance use disorder treatment or rehabilitation. These service needs may be used to qualify a family for a 12-month authorization for full-time care, even if the parent is working or attending an education or training program. Families will still be required to submit income information, and a parent fee may be assessed.

- Domestic Violence

When a family qualifies for the service need Protective due to domestic violence, FAAs must work with the parent to obtain a signed self-declaration attesting to a situation of domestic violence involving the parent and/or child and ONE of the following documents to confirm service need:

- Court, medical, psychological, criminal, child protective services (DCF), social service, school or police records;
- Documents that show that the applicant parent has obtained an order of protection or has taken other legal steps to end the domestic violence;
- Evidence of seeking a safe place such as a shelter; or
- A letter reflecting that the parent participates, or has participated, in domestic violence counseling services, including support groups.

- Substance Use Disorder Treatment or Rehabilitation

When a family qualifies for the service need of Protective due to substance use disorder treatment or rehabilitation, FAAs must work with the parent to obtain a self-attestation of the parent's treatment plan and the following documents to confirm service need:

- Written statement on professional letterhead from a certified medical authority or treatment program staff which includes the name and type of program, start and expected end date, and hours per week.

▪ **Parental Leave**

This updated service need provides parents who are on a temporary leave from employment, education, or training for reasons connected to the birth of a child, the placement of a child in the family, or the care of a child, a 12-month authorization for full-time care. This service need can be used at initial authorization or reauthorization for one parent in a household. If a parent has additional service needs, they must be entered, including employment or Paid Family Medical Leave (PFML) benefits. All countable income must be entered and a parent fee assessed, if applicable. If the parent reports the parental leave within an active authorization, this service need may remain until their reauthorization. They may continue to be eligible for this reason at reauthorization based on their documentation.

FAAs must confirm the parent's name, the start and expected end date of leave, and the reason for leave included in ONE of the following documents for this service need:

- letter from employer/educational or training program;
- letter from doctor/adoption agency;
- document showing paid medical leave; or
- signed self-attestation that the parent is on parental leave.

▪ **Military**

This new service need qualifies families with a parent who is active in the U.S. military, including the National Guard, and deployed or activated to a combat zone, hazardous duty zone, or venue for preparation for deployment to a combat or hazardous duty zone. Families with a service need of Military will qualify for a 12-month authorization for full-time care. In a two-parent household, the second parent does not need to have their own service need. If the primary or second parent (if part of household) does have any other service need, it must be entered and a parent fee assessed if applicable.

FAAs will confirm a parent's status with the following documents for this service need:

- military orders that confirm parent is in the U.S. military and is currently deployed or activated to a combat zone, hazardous duty zone, or venue for preparation for deployment to a combat or hazardous duty zone

▪ **Reminders:**

- FAAs must inform parents of all service need options while exploring any challenges they identify at the first interaction.
- FAAs must connect parents without a service need to employment, education, or training resources in their area, such as their MassHire Career Center or other employment services programming based on their goals.
- Full-time service need is defined as 25 hours or more per week.
- Families with new employment at the time of authorization can use an employment letter or Employment Verification Form (EVF) to confirm their service need.
- Families that provide an employment letter or EVF must be issued a 12-month authorization and will be entered into CCFA as “employment”.
- The parent must provide paystubs at reauthorization if initially authorized with an employment letter or EVF because it was a new job.
- “New Employment” and “New Self-Employment” are no longer selectable options in the CCFA system.

RESOURCES

The information in this policy advisory supersedes all provisional authorization and/or Seeking Approved Activity policy references in the following sections of the Interim Income Eligible Child Care Financial Assistance policies:

- Service Need - Seeking Approved Activity (middle of pg. 15)
- Service Need - Combining Service Need Activities (middle of pg. 17)
- Eligibility - Authorization Periods (pp. 17-18)
- Eligibility – Authorization Periods – Reauthorization (middle of pg. 18)
- Parent Fees (pg. 23)

This advisory provides updated guidance only with regard to all other Child Care Financial Assistance provisions previously shared through the following policy communications:

- [Interim Income Eligible Child Care Financial Assistance Policies - October 1, 2023](#)
- [Interim DTA-Related Child Care Financial Assistance Program Policies - October 1, 2023](#)
- [EEC Policy Advisory - Field Operations 7-2024](#) – Child Care Financial Assistance

Please visit EEC’s online [Hub for Child Care Financial Assistance Programs Changes](#) for the most recent regulations, interim policies, and policy advisories.

For assistance with the implementation or interpretation of these interim Child Care Financial Assistance policies, please contact EEC at eeccsubsidymanagement@mass.gov.