



POLICY ADVISORY

Field Operations 2024-17

Policy: FY25 Approved Closures for Programs Participating in CCFA

Policy Effective Date: July 1, 2024

Updated: August 30, 2024

This Policy Advisory includes several updates along with Frequently Asked Questions (FAQs) that provide additional clarification to supplement the original Policy Advisory released in July 2024.

Overview

The Department of Early Education and Care (EEC) has updated, increased and aligned the number of Approved Closure Days for Group and School Age (GSA) programs, Family Child Care (FCC) Systems and FCC Educators participating in the Massachusetts Child Care Financial Assistance (CCFA) system. This change acknowledges the needs of our professionals working in the field and provides programs with additional flexibility to determine closure dates that work for them, their staff and their families.

This policy advisory provides clarification on the new approved closure day rules and guidance across program types to support implementation.

Applicability

This guidance pertains to GSA programs, FCC Systems and FCC Educators participating in CCFA.

Key Updates

- Both GSA programs and FCC Educators and Systems will now have up to 27 Approved Paid Closure days per year (defined as EEC's fiscal year, which begins on July 1 and ends on June 30).
- These days include 12 state holidays, 5 professional development days and 10 additional Flexible Closure Days which programs can schedule at their discretion based on staff and family needs. Programs may choose to use some of their Flexible Closure days between Christmas and New Year's Day, or at other times during the year based on what makes sense for any individual program and their staff and families.

- The twelve (12) Approved Paid Closure holidays include:
 1. New Year's Day
 2. Martin Luther King, Jr Day
 3. Presidents' Day
 4. Patriots' Day
 5. Memorial Day
 6. Juneteenth
 7. Fourth of July
 8. Labor Day
 9. Columbus Day/Indigenous People's Day
 10. Veterans Day
 11. Thanksgiving
 12. Christmas Day

- In addition to the 10 flexible paid closure days, GSA programs and FCC Educators and FCC Systems can continue to close for up to five paid professional development days per year.

- GSA programs, FCC Systems and Child Care Resource and Referral (CCRR) agencies will still be required to submit approved closure dates to EEC on the Closure Schedule Form (FCC System and Center-Based) to ensure EEC has each organization's full closure schedule for the fiscal year. As always, programs should work with their families to determine an operating schedule that both supports access for families and opportunities for staff and educators to schedule time off or participate in professional development opportunities. It is important to provide families with as much notice as possible about program closures so that families can find alternative care arrangements, if needed.

Effective FY25 and moving forward, there is no longer an accrual process for Flexible Closure Days formerly known as Paid Time Off (PTO) and now these days will be given on July 1 of each year.

NOTE: FCC educators will not see the approved closure days in CCFA until the CCFA system is updated in late September.

Resources

Frequently Asked Questions that provide additional clarification about this guidance are included below.

Additional information about procedures and documentation will be provided as additional updates are made to the CCFA IT system. The CCFA system updates needed for this policy are tentatively scheduled for late September.

Obsolete

This policy advisory replaces any previous approved closure day guidance.

FREQUENTLY ASKED QUESTIONS FOR APPROVED CLOSURE POLICY FOR GROUP AND SCHOOL AGE (GSA) PROGRAMS, FAMILY CHILD CARE (FCC) SYSTEMS AND FCC EDUCATORS

FOR GSA PROGRAMS, FCC SYSTEMS AND EDUCATORS:

1. What are the types of Approved Closure days?

Please see the chart below.

Type of Approved Closure Days	Number of Days
State Holidays	12
Flexible Closure Days	10
Professional Development Days	5

Please note that programs may substitute religious holidays for any of the identified holidays and may swap up to two of the identified holidays for other day(s) of the provider's choice. This means that a program could open on a holiday and close on another day of their choice.

2. Do Paid Time Off (PTO) days still exist?

PTO will now be referred to as Flexible Closure Days. Additional information is provided below about Flexible Closure Days. The term Paid Time Off (PTO) day will be changed to Flexible Closure Days in the CCFA system and in all billing and payment procedures. Once this functionality is rolled out, PTO will no longer be a category in CCFA. The CCFA system updates needed for this policy are tentatively scheduled for late September.

3. Can GSA programs and FCC Systems carry over Flexible Closure Days into the next Fiscal Year?

No, GSA programs and FCC Systems will not be able to carry over Flexible Closure Days into the next fiscal year and must be used by June 30.

4. Do GSA programs and FCC Systems still get 5 Professional Development (PD) Days?

Yes, GSA programs and FCC Systems still have up to 5 Professional Development Days per year. GSA programs and FCC Systems may decide to use 5 or fewer professional days. EEC considers professional development as a required and necessary support for all educators.

5. Can a program without active CCFA enrollments be reimbursed for Approved Closure days?

No, programs will only be reimbursed when there is an active child care placement in CCFA.

6. How should attendance be entered for children whose programs have already used closures for the 2025 fiscal year?

The CCFA system has not been updated yet to allow for the 10 Flexible Closure Days on the GSA program’s schedules. Please refer to the billing guidance released by EEC through the Subsidy Mailbox in July 2024 until further notice.

FOR GSA PROGRAMS ONLY:

1. What can GSA programs use Flexible Closure Days for?

Flexible Closure Days may be scheduled at a program’s discretion based on staff and family needs. Programs may choose to use some of the additional approved closure days between Christmas and New Year’s Day, or at other times during the year based on what makes sense for any individual program and their staff and families.

2. How does EEC reimburse GSA programs for Approved Closure days and Professional Development days?

Please see the chart below.

Type of Closure	EEC Reimbursement
State Holidays	Full Daily, including Parent Fee
Flexible Closure Days	Full Daily, including Parent Fee
Professional Development Days	Full Daily, including Parent Fee

3. Can GSA programs at the same location use different closure days (e.g. School Age program staff have a Professional Day, and the Preschool program will remain open)? How would that be entered into CCFA?

Yes, GSA programs at the same location may use different closure days based on the needs of staff and families however, this functionality is not yet available. The CCFA system updates needed for this policy are tentatively scheduled for late September.

4. Are GSA programs required to submit the Annual Submission of Closure Schedule to EEC in the beginning of the Fiscal Year?

Yes, all programs serving children that receive CCFA are required to submit a closure schedule yearly. Contracted GSA programs submit the Annual Closure Schedule Form to EEC and Voucher Only Providers are required to submit it to their CCRR. Reporting should include Holiday Closures, Professional Development Days, and Flexible Closure days.

FOR FAMILY CHILD CARE (FCC) EDUCATORS ONLY:

1. Are FCC Educators required to use the same Flexible Closure Days as the FCC System Administrative Office?

No, FCC Educators operating under a System are not required to use the same Flexible Closure Days as the FCC System Administrative Office and must be given the flexibility to choose days that work best for their program. FCC Educators may substitute religious holidays for any of the identified holidays and may swap up to two of the identified holidays for other day(s) of the provider’s choice

2. What can FCC Educator Flexible Closure Days be used for?

Flexible Closure Days may be used by FCC Educators for sick, vacation, personal and/or bereavement time.

3. When are FCC Educators unable to use Flexible Closure Days?

FCC educators cannot use Flexible Closure Days if the program is no longer licensed by EEC, no longer has a voucher or contract agreement, or does not have any children receiving CCFA in placement.

4. How many Flexible Closure Days do FCC Educators get this Fiscal Year 2025 (July 1, 2024- June 30, 2025)?

Due to the contract ratification date, FCC educators that entered into a voucher agreement or contracted with an FCC System on or prior to June 30, 2024, will be given 5 Flexible Closure Days retroactively and 10 Flexible Closure Days. **This means that all FCC Educators that meet these criteria will have 15 Flexible Closure days in FY2025 and up to 5 carryover days from FY2024. The maximum allowable Flexible closure days for FY2025 is 20 days.**

FCC Educators will have until December 31, 2024, to use all carryover days (FY24 Retro Flex days and FY24 Carry over days). Please see chart below for details.

Fiscal Year (FY)	FY25	FY26	FY 27
Carry Over Days	Up to 5 days	Up to 3 days	Up to 3 days
FY24 Retro Flex Days	5 days	N/A	N/A
Flexible Closure Days	10 days	10 days	10 days
Max Days by Fiscal Year	20 days	13 days	13 days

A CCFA system change is pending to implement this change. The CCFA system updates needed for this policy are tentatively scheduled for late September.

5. How many Flexible Closure Days can be carried over by an FCC Educator in future years?

FCC Educators may carry over up to 3 Flexible Closure Days each fiscal year starting in Fiscal Year 2026 (which begins July 1, 2025). FCC Educators will have until September 30th of each fiscal year to use the time. Any carried over time that is not used by September 30th will be lost. A CCFA system change is pending to implement this change.

6. What happens if an FCC Educator already used Flexible Closure Days (or former PTO) after July 1, 2024?

EEC will not be counting any Flexible Closure Days used during the month of July 2024. Any carryover time from FY24 used by a FCC Educator after July 2024 will count toward their used time.

7. When can FCC Educators begin using the Retro Flex Days?

FCC Educators that entered into a voucher agreement or contracted with an FCC system on or prior to July 1, 2024 will start with 5 retroactive days effective August 1, 2024.

8. What is the deadline to use the carried over and Retro Flexible Closure Days from FY24?

FCC educators will have until December 31, 2024 to use all carryover days (FY24 Retro Flex days and FY24 Carry over PTO days).

9. How are Flexible Closure Days accrued for FCC Educators?

Effective FY25 and moving forward, there is no longer an accrual process. FCC Educators will be given 10 Flexible Closure Days on July 1 of each year.

New FCC Educators accepting child care financial assistance will be subject to a 90 day waiting period before they can use their Flexible Closure days. For example, an FCC Educator who started serving children in January cannot use Flexible Closure time until 90 days from January 1st.

FOR FAMILY CHILD CARE (FCC) SYSTEMS ONLY:

1. When must substitute care be offered and what is the reimbursement to the original FCC Educators and the substitute care Educators?

Please see the chart below.

Type of Closure	Substitute care offered	Reimbursement
State Holidays	No	Full Daily, including Parent Fee
Flexible Closure Days	Yes	Original FCC: Full Daily, including Parent Fee
		FCC Sub: Full Daily, minus Parent Fee
Professional Development Days	No	Full Daily, including Parent Fee

2. Who is required to submit the Annual Submission of Closure Schedule to EEC in the beginning of the Fiscal Year?

EEC requires FCC Systems to submit the Annual Submission of Closure Schedule to EEC and Independent FCC Educators are required to submit it to their CCRR to report their Holiday Closures, Professional Development Days, and Flexible Closure Days.

3. When are FCC Systems required to enter each FCC Educator schedule into CCFA?

FCC Systems are required to enter each FCC Educator's 12 Holiday closures (including holiday swaps if needed) into CCFA by September 30, 2024.

4. How do FCC Systems add in each Educator's holiday closures in CCFA?

CCFA allows the administrative organization to delink the admin organization from the educator's schedule. Please see CCFA system guidance at <https://www.mass.gov/lists/ccfa-training-resources> for an explanation of this function.

5. When and how should the FCC Systems be notified of an FCC Educator's closure?

FCC Systems should work closely with their FCC Educators to understand and coordinate their schedules throughout the year. FCC Educators should report their Holiday schedule to the FCC System at the beginning of the fiscal year, including any plan to swap out the approved state Holidays for religious holidays or 2 other (non-religious) days of the educator's choice, and planned Flexible Closure Days.

Systems should work with their FCC Educators on Flexible Closure Day coordination.

FCC Educators are responsible for notifying their Family Child Care System (FCC System) or Child Care Resource and Referral Agency (CCRR) in writing in the event they intend to use Flexible Closure Days. The FCC System or CCRR must respond in writing to confirm that the notification has been received. Notification by email is considered sufficient written communication.

FCC Educators must notify their FCC System of the use of their Flexible Closure Days at least 7 days in advance.

In the event of an unplanned or unexpected Flexible Closure Day, FCC Educators must communicate the closure as soon as possible.

FCC Educators who wish to rescind a previously scheduled Approved Closure Day must inform their FCC System or CCR&R that they will not be using the scheduled time at or before the start of the workday.

6. What is the FCC System's responsibilities when an FCC Educator's program is open when the Administrative Office is closed for a Flexible Closure Day?

FCC Systems must provide all FCC Educators with written emergency protocols including contact information for a designated on-call staff when the administrative office is closed. This contact information must be provided to all FCC Educators prior to the date of closure. Also, the System must inform FCC Educators of any services provided by the System that will be unavailable on these closure days such as transportation or backup care. Whenever possible and if available, back up care should be offered to families on Flexible Closure Days.

FCC Educators should continue normal communication with EEC licensing staff in the case of emergency.

7. Some FCC Systems have used Flexible Closure Days or unpaid closure days to close on the day after Thanksgiving or Christmas. Are these days still available to FCC Educators?

FCC Educators, and all programs, may choose to use their 10 Flexible Closure Days at their discretion, with appropriate notification to families, including for the days after Thanksgiving or Christmas.

8. Can an FCC Educator take a Partial Flex Day?

Flexible Closure Days are intended to be used for days that a program is closed for the entire day and are not able to be spilt up and spread out over multiple days.