



POLICY ADVISORY

Field Operations 2023-4

Policies: Interim Income Eligible, Department of Children and Families (DCF), and Department of Transitional Assistance (DTA) Child Care Financial Assistance Policies

Effective Date: October 1, 2023

Policy link: <https://www.mass.gov/doc/interim-income-eligible-child-care-financial-assistance-program-policies-october-1-2023/download> ;
<https://www.mass.gov/doc/interim-dcf-related-child-care-financial-assistance-program-policies-october-1-2023/download> ;
<https://www.mass.gov/doc/interim-dta-related-child-care-financial-assistance-program-policies-october-1-2023/download>

OVERVIEW

EEC has been working to make significant 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. With improved regulations comes updated policies. EEC is issuing new interim policies to reflect these changes that aim to simplify the application process, reduce the paperwork burden for families and programs, and better support homeless families, families with disabilities, and families impacted by domestic violence.

The Interim Income Eligible, Department of Children and Families (DCF), and Department of Transitional Assistance (DTA) Policy Guides are also effective as of 10/1/2023, but are being issued on an interim basis in anticipation of additional updates and further changes to follow. All of the new interim policies currently in effect are outlined below. The changes not effective 10/1 require technology changes, training and additional guidance prior to implementation.

For technical assistance or clarification on which policies are in effect as of 10/1, please email eeccsubsidymanagement@mass.gov or [register for a drop-in office hours](#).

APPLICABILITY

These policies apply to all family access administrators.

KEY REGULATION TERMINOLOGY UPDATES

- The regulations now include more inclusive and accessible language and terminology, including:
 - Gender neutral terms;
 - “Subsidy” changed to “child care financial assistance”;

- “Special needs” changed to “disability”;
- “Subsidy administrator” changed to “family access administrator”; and
- The non-discrimination statement has been updated to reflect current legal protections.

KEY POLICY UPDATES – INTERIM POLICIES IN EFFECT 10/1

Income eligible

- Families experiencing homelessness (as defined under Subtitle VII-B of the McKinney-Vento Homeless Assistance Act (See 42 U.S.C. 11434a(2))) are now eligible for priority access from the waitlist:
 - Eligibility can be verified through a referral form, shelter letter, or other documentation as defined by EEC.
 - Families will be eligible for full-time care; this means that there is no additional service need required (service need and activity is entered in CCFA as “homeless” and weekly hours = 30).
 - No collection of income is required, and no income should be entered in CCFA.
 - Families will not be assessed a parent fee.
 - Families are allowed up to 6 months to comply with immunization and other enrollment paperwork requirements.
- Early education and care staff are now formalized as a priority status. This will no longer be a pilot.
- Families with new employment can use an employment letter or employment verification form (EVF) to receive a 12-month authorization.
 - Families no longer need to also provide pay stubs.
 - Families should be entered as “employment” in CCFA, not “new employment.”
- Family child care providers and assistants are now eligible to care for their own children if meeting certain conditions.
- Providers will no longer collect an initial deposit from families.
 - This replaces the policy that families were charged an initial weekly deposit for their first week (charged 2 weeks in total to start) to cover their last week of care.
- “Abandonment of subsidy” has been eliminated as a reason for termination.
- Verification of disability requires only one form of documentation (doctor's letter or form).
 - You no longer need both forms of documentation.

Communication

- Family access administrators must now use multiple modes of communication to reach families (e.g., mail, email, text, phone).
- Funding availability notifications must be sent to families via email or mail.
- Families access administrators must email and mail notices to confirm a family's status on the waitlist (i.e., confirmation and removal).
- Before a family's child care financial assistance can be terminated, the family access administrator must make two separate attempts using different modes of communication to reach the family (e.g., phone call one day, email the next day).

- Families must be sent a reauthorization notice within at least 60 days prior to the end of their authorization period. This time period is expanding from previously 45 days.

Verifications

- SSI, SSDI, child support, and TAFDC benefits are no longer types of countable income.
- Current policy formalized that expired IDs are acceptable forms of verifications. Family access administrators should accept an expired document as proof of identity if the document is otherwise sufficient to establish a parent's identity regardless of when the document expired.
 - Also, if no ID is available, families can use two other forms or any other document that can determine or verify identity.
- The third-party verification form (2nd parent not in home) is now eliminated and will no longer be used.
 - Family access administrators do not need to verify this information anymore for the other parent.
- Proof of address is now only required at initial authorization, unless a family has a change in address.
 - This is also no longer required at reauthorization, unless there is a change in address.
- Parents are now able to submit 4 non-consecutive weeks of wages within the last 26 weeks (6 months) that are most reflective of their income.

DTA and DCF

- Waive asset test for TAFDC and DCF families.
- Families seeking child care within 24 months of their DTA or DCF case closure are eligible for immediate access to child care.
 - This is an increase from 12 months prior.
 - Parent fees will not be assessed during the first 12 months of transitional child care.
- Family access administrators are now required to reach out to a family within 3 business days of receiving a DTA or DCF referral.

RESOURCES

EEC is hosting training sessions starting in mid-October. The training schedule will be added to [our website](#) soon. The page currently includes a recording of the kick-off session held in September and the accompanying slide deck.

For assistance with the implementation or interpretation of these interim child care financial assistance policies, contact EEC at eeccsubsidymanagement@mass.gov or [register for a drop-in office hours](#).

OBSOLETE

These policies replace the agency's previous child care financial assistance programs policies.