



POLICY ADVISORY

Field Operations 2024 - 7

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

Effective Date: April 30, 2024

Policy Link: <https://www.mass.gov/collections/child-care-financial-assistance-policy-guidance-and-resources>

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 issued 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.

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 to follow. The agency's [EEC Policy Advisory – Field Operations 2023 – 4 – Child Care Financial Assistance](#) listed all of the interim policies that were currently in effect.

This policy advisory updates that list and highlights key changes of all interim policies currently in effect to align with recent technology changes, training and additional guidance. Effective immediately all Family Access Administrators must follow these policies.

For technical assistance or clarification please email eeccsubsidymanagement@mass.gov or [register for a policy refresher](#).

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” (FAA).
- The non-discrimination statement has been updated to reflect current legal protections.
- “Young Parent” changed to “Parent under 24.”
- “Maternity Leave” changed to “Parental Leave.”

KEY POLICY UPDATES – INTERIM POLICIES IN EFFECT 4/30

Income eligible

Waitlist Management and Communication

- Family Access Administrators must update Kinderwait with notes anytime a family reaches out to a Family Access Administrator and/or outreach by the Family Access Administrator to the family.
- Family Access Administrators must now use at least two modes of communication to reach families (e.g., mail, email, text, phone).
- Funding Availability Notices must be sent to families via email and/or mail as the first mode of communication.
- Family Access Administrators must email and mail notices to confirm a family’s status on the waitlist (i.e., confirmation and removal).
 - The Family Access Administrator that adds a family to KinderWait is responsible for sending the Confirmation Notice to the family.
 - The Family Access Administrator that terminates the family from KinderWait for any reason is responsible for sending the Removal Notice to the family along with a Request for Review, this includes termination from the waitlist for failing to respond to the Funding Availability Notice.
 - Before a family is removed from the waitlist, 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).
- Waitlist priority codes have been updated in KinderWait to include “Experiencing or have experienced Domestic Violence and “Substance Abuse Rehabilitation.”
- When doing the soft eligibility screening, the Family Access Administrator will give the family a list of priority access statuses and ask if the family self-identifies with any of the statuses.
 - If the family does self-identify, the priority codes need to be marked off in KinderWait. Based on the code, further actions may need to be taken as stated on the soft eligibility steps.
- Redefined baseline criteria for offering child care financial assistance due to priority status.
 - Waitlist priority statuses have been broken down by 4 priority statuses:
 - Immediate with a referral (DCF, DTA).
 - Immediate (families experiencing homelessness, parent younger than 24, families experiencing domestic violence, families with a parent working in

- an early education and care program and families with a sibling already receiving child care financial assistance).
 - Priority (families with a child or parent with a disability including participating in substance abuse treatment and/or rehabilitation, families whose eligibility for another child care financial assistance program is ending (e.g. Head Start), families with a legal guardian including a grandparent and families with a parent who is actively deployed to military duty.
 - General (families that do not self-identify with any other statuses).
- According to the community’s needs the Family Access Administrators will ensure equity when offering funding to families by looking at:
 - Priority Status
 - Date family was added to the waitlist.
 - Date family requires care.
 - Family’s program preference.
- Funding Availability Offers that are refused are redefined.
 - Families who decline a funding offer, because it’s not for their specified preferred provider or preferred program type (voucher, center based, family child care, informal care) will not count as a refusal.

Eligibility

- Once a family is determined eligible for child care financial assistance and is issued a 12-month authorization, the family may access care anytime during that 12-month period.
 - For example, a family seeking summer care only may be approved and authorized in March with a placement for June. This allows for more flexibility around parent choice and continuity of care for families who transition in and out child care based on their needs.
 - A family can reauthorize even if there is not a current placement, as long as the family is within the time frame to reauthorize.

Income

- Families may submit proof of income received within the last 26 weeks.
- Pay stubs submitted do not have to be consecutive.
 - 4 out of 26 weeks if weekly.
 - 2 out of 26 weeks if bi-weekly/bi-monthly.
 - 1 out of 26 weeks if monthly.
- Self-employed families only need to report one month of income.
 - Proof of receipts and expenses are no longer required.
- Family Access Administrators should not include these sources of income when determining eligibility, they are no longer types of countable income:
 - Social Security Income (SSI)
 - Social Security Disability Income (SSDI)
 - Veteran's Disability benefits
 - Transitional Aid to Families with Dependent Children (TAFDC) benefits
 - Child Support

- Child support may continue to be deducted when paid out.
 - When entering paid child support in the child care financial assistance system, use a minus (-) before the amount (e.g. -50).

Eligibility Documentation

- Expired IDs are acceptable forms of verification.
 - 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 obsolete and must 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.
- A child shall not be denied child care financial assistance based only on an applicant’s failure to demonstrate citizenship or immigration status of the child seeking care without final review by EEC. Family Access Administrators should submit all documents that the parent has to confirm the child’s citizenship/immigration status to EECSubsidyManagement@mass.gov for review.

Service Need

- Full time service need is defined as 25 hours or more per week.
- Families Experiencing Homelessness: 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 homeless referral from EOHLA, 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 = 25).
 - No collection of income is required, and no income should be entered into CCFA.
 - Families will not be assessed a parent fee.
 - Homeless families are allowed up to 6 months to comply with the child’s immunization and physical paperwork requirements.
 - A family experiencing homelessness no longer has a two-year limit.
- Early Education and Care staff is now formalized as a priority status. This will no longer be a pilot.
 - A family with a parent who is currently working at a licensed or funded early education and care program will be eligible for immediate access to child care based on funding availability.
 - Family Child Care providers and assistants are now eligible to care for

their own children if meeting certain conditions.

- Requests for Family Child Care providers to care for their own children must be sent to the EEC Subsidy Mailbox (EECSubsidyManagement@mass.gov) to determine eligibility at this time.
- **Education**
 - 10 college credits are considered full time (10 credits x 2.5 hours = 25 hours)
 - Graduate school is a service need ONLY at reauthorization AND if previous service need was education.
- **Employment**
 - Families with new employment at the time of authorization can use an employment letter or employment verification form (EVF).
 - Families that provide an employment letter or EVF must be issued a 12-month authorization and will be entered into CCFA as “employment” and not “new employment”.
 - The parent must provide paystubs at reauthorization.
- **Disability of Parent** can be combined with another service need. Current form and a letter should be used.

Parent Fees

- 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.
- EEC will continue to pay the daily reimbursement rate minus any parent fees, up to 2 weeks or until the child’s last day of care, whichever is sooner.
- Family Access Administrators must institute their own policies on the collection of parent fees.

Denials and Termination Notices

- “Abandonment of subsidy” has been eliminated as a reason for termination.
 - While the forms have not been updated, please do not use this reason.
 - If a family leaves care, but still has a valid 12-month authorization, the family may re-access care without being placed on the waitlist, given a Request for Review or submitting additional documentation (unless there was a change).
 - Verify with the family if there have been any changes in service need and/or income since their care last ended.
- Before a family’s child care financial assistance placement or authorization 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).
- Terminations of a child’s placement can be issued in the following circumstances:
 - 30 consecutive unexplained absences - a two-week termination notice

- may be issued on the 31st day.
- 45 non-attended days including unexplained absences - a two-week termination notice may be issued on the 46th day.
- The Termination ONLY applies to the child's placement - NO CHANGE SHOULD BE MADE TO THE AUTHORIZATION.

Reauthorizations

- Families must be sent a reauthorization notice at least 60 days prior to the end of their authorization period. This time period was previously 45 days.
- 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) to notify the family care needs to be renewed.
- A Notice of Denial should be issued 2 weeks prior to the end of the authorization period.

DTA and DCF Transitional Child Care

- Families seeking child care within 24 months of their DTA-TAFDC or DCF case closure may be eligible for immediate access to child care. This is an increase from 12 months prior for DTA and DCF families.
 - Family Access Administrators should work with families to obtain confirmation of DTA and/or DCF case closure date.
- If the family is in the middle of a DCF or DTA Related Child Care authorization, the authorization shall not be shortened; the case closure date will be the last day of the current DCF or DTA Related Child Care authorization.
- The Transitional authorization will always be a full 12-months (see exception below).
 - If a new referral is received indicating case has reopened, a new authorization should be entered in accordance with the referral.
- Provisionals do not count towards the 1st and 2nd 12-month transitional periods.
- Parent fees will not be assessed during the first 12 months of transitional child care.

Enrollment and Attendance

- Providers will now be reimbursed based on enrollment which is based on authorization and placement whether it is full-time or part-time. Providers must ensure that families have an authorization and child care placement and the child is attending care before they can be reimbursed.
- See [EEC Policy Advisory - Field Operations 2024 - 6 - CCFA Enrollment and Attendance Codes](#).

PENDING POLICY CHANGES–

- Domestic Violence / Substance Use Treatment as a standalone service need
- Change to 12-month authorization period for parental leave
- Change to verification documentation requirements for disability of child, parent or dependent

- Change to time limited 12- week Provisional authorizations
- Change to time period a family can reauthorize after authorization has ended
- Changes to all EEC CCFA forms including standard CCFA application, CCFA notices, Kinderwait notifications, variances and Request for Reviews
- Parent fees for DCF families being assessed during for second year of Transitional child care

RESOURCES

Please visit our online [Hub for Child Care Financial Assistance Programs Changes](#) for current information, announcements, and trainings on child care financial assistance.

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 policy refresher](#).

OBSOLETE

This advisory replaces the agency's [EEC Policy Advisory – Field Operations 2023 – 4 – Child Care Financial Assistance](#) that listed all of the interim policies currently in effect.