




ADMINISTRATION FOR  
**CHILDREN & FAMILIES**

 Office of Child Care

## **Territory CCDF Administrators Meeting 2025**

July 25, 2025

Hyatt Regency Reston  
Reston, Virginia



# **Ensuring Continuity of Care Through 12-Month Eligibility**



## Introductions

### Christie Bearden

Technical Assistance Liaison

National Center on Subsidy  
Innovation and Accountability

### Shelley Weatherwax

State and Territory  
Systems Specialist

State Capacity Building Center

### Alejandra Alvarez-Ibanez

State and Territory  
Systems Specialist

State Capacity Building Center





- 1 CCDF Requirements and Flexibilities**
- 2 Ensuring Continuity of Care Through 12-Month Eligibility**
- 3 Temporary Change in Eligible Activity**
- 4 Termination and Suspension of Assistance**

## Agenda



## CCDF Requirements and Flexibilities



# CCDF Requirements

## Lead Agencies must include in their CCDF Plan:



Definitions for eligibility, including terms like special needs child, physical or mental incapacity, attending job training or educational programs, residing with, working, etc.



A description of eligibility determination and redetermination processes to promote continuity of care



## CCDF Requirements

### Lead Agencies must:



Provide at least  
12 months of  
eligibility per child



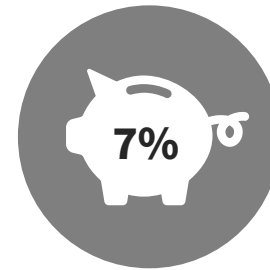
Have a sliding  
fee scale



Support parental choice by  
ensuring all families are  
offered the option of a  
voucher



Keep co-payments the same within  
the 12-month eligibility period



Limit co-payments to 7%  
of family income or less



# Discussion



If a family already receiving CCDF has a new sibling, can the new child just be added to the family's case and redetermine the entire family at their original 12-month redetermination date?



# Discussion



It is not allowable to just add a new sibling to a family's existing case if the redetermination date is less than 12 months after the new child is added. The new child must receive at least 12 months of eligibility before they are redetermined eligible. The family friendly option is to add the new child to the case and extend the eligibility period for all the children in the family for a minimum of 12 more months.







## **Ensuring Continuity of Care Through 12-Month Eligibility**



# Continuity of Care Requirements

**Lead Agencies must:**



Take into consideration  
children's development  
and learning



Promote continuity of  
care when authorizing  
child care services



# Continuity of Care Requirements

**Continue assistance at the same level despite:**



Changes in family  
income that do not  
exceed 85% SMI



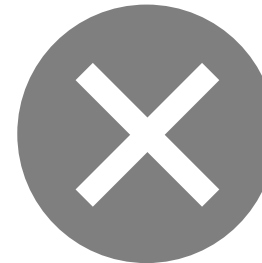
Temporary  
changes in  
activities



Changes in age



Changes in residency  
within the territory



Loss of activity (for at least  
three months per instance)



## CCDF Flexibilities



Eligibility periods longer than 12 months



Sliding fee scale factors



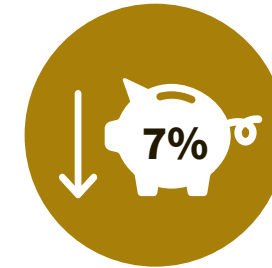
Ways to support parental choice



Definitions for work, education, and training, children receiving or needing protective services



Income limits for applicants and individuals in a graduated phaseout period (if applicable)



Sliding fee scale percentages of income below 7%

# Discussion



Can a Lead Agency backdate an eligibility period start date? For example, if the family is already receiving child care and is approved for subsidies on the 15<sup>th</sup> of the month, can the Lead Agency pay for child care services starting on the 1<sup>st</sup> of the month?





# Discussion



Yes, the Lead Agency can pay for child care services a family was already using before they were officially approved, and their 12-month eligibility can start from that earlier date. But if the family wasn't using child care yet, their 12-month eligibility can only start date after they're approved.





## Temporary Change in Eligible Activity



# Continuity of Care Requirements



A Lead Agency **may not** terminate services before the end of a minimum 12-month eligibility period if the family experiences a **temporary change** in eligible activity.

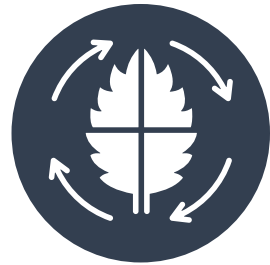


# Continuity of Care Requirements

## Definition: Temporary Change in Eligible Activity



Any reduction in work, training, or education hours



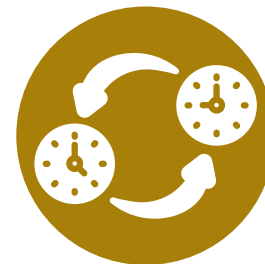
Any interruption in work for a seasonal worker



Any student holiday or break in training or education



Any time-limited absence such as a need to care for a family member or illness



Any other changes that do not exceed three months, or a longer period if established by Lead Agency



# Discussion



Can a Lead Agency terminate subsidies for a family if the eligible parent takes maternity leave from work?





# Discussion



No, the Lead Agency cannot terminate services due to this temporary change in eligible activity, so long as there is an employee/employer understanding that the parent intends to return to work.





# Termination and Suspension of Assistance



# Termination

**A Lead Agency may discontinue assistance if there are:**



Changes in family income that exceed 85% SMI



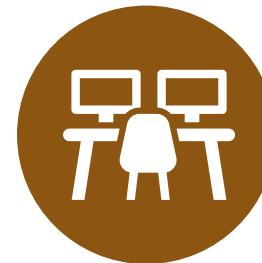
Excessive unexplained absences



Change in residency outside the territory



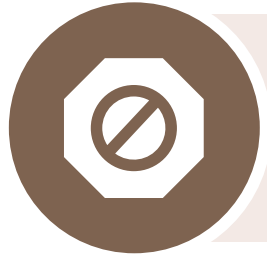
Substantiated fraud or intentional program violations that invalidate prior eligibility



Non-temporary changes in activities



## Suspension of Assistance



If a family asks to be removed from the subsidy program, the Lead Agency may suspend the case.



If the family returns, the case must be reactivated (no additional determination).



The Lead Agency does not have to pay for services during the time of suspension.

# Discussion



Can a Lead Agency discontinue subsidies for a family if the family reports that they no longer need child care?





# Discussion



A Lead Agency does not have to pay for child care services that the family does not receive after requesting to discontinue, but there must be a process in place to reinstate a child's benefits without the need to submit a new application if the child needs child care again during their minimum original 12-month eligibility period.





# **Questions and Discussion**





## Resources



CCDF Final Rule:  
Understanding Subsidy  
Eligibility Webinar

<https://acf.gov/occ/training-technical-assistance/ccdf-final-rule-understanding-subsidy-eligibility-webinar>

Twelve-month Eligibility  
When Adding Additional  
Children

<https://childcareta.acf.hhs.gov/resource/twelve-month-eligibility-when-adding-additional-children>



OCC's CCDF Frequently Asked Questions

<https://acf.gov/occ/faq/child-care-and-development-fund-final-rule-frequently-asked-questions>

Family-friendly Eligibility  
and Enrollment Policies

<https://childcareta.acf.hhs.gov/sites/default/files/new-occ/resource/files/family-friendly-eligibility-and-enrollment-policies.pdf>



Expanding Educational Freedom and  
Opportunities for Families

<https://acf.gov/occ/policy-guidance/educational-freedom-and-opportunities-for-families-acf-occ-ccdf-im-25-04>



ADMINISTRATION FOR  
**CHILDREN & FAMILIES**



# Thank you!

**Email:** [ncsia@wrma.com](mailto:ncsia@wrma.com)

**Phone:** 301-881-2590 x273



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