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To Lead Agencies administering child care programs under the Child Care and Development Block Grant (CCDBG) Act of 1990 as amended, and other interested parties.

Subject **Policy Interpretation Question:** The length of CCDF eligibility for children in collaboratively-funded slots.

References The Child Care and Development Block Grant Act, 45 CFR Part 98.

Question CCDF administrators have asked whether the period of eligibility for children who occupy slots in programs collaboratively funded with Head Start, Early Head Start or pre-Kindergarten (pre-K) programs under the provisions of 45 CFR 98.51 may be different from that of other CCDF-funded children. Specifically, they ask whether CCDF eligibility, once determined, can be effective for a set period of time consistent with the Head Start, Early Head Start or pre-K eligibility period, even if the family’s circumstances change during that time.

Answer: Statute & regulations provide for flexibility The Child Care and Development Block Grant Act (CCDBG) does not prescribe a specific eligibility period for families receiving CCDF-funded child care. Nor does the Act address the frequency of, or need for, redetermining eligibility once it is established.

In the implementing regulations, ACF left the Lead Agency flexibility to establish its eligibility process. Hence, the Lead Agency may establish a different eligibility period for children in Head Start, Early Head Start or State pre-K/child care collaborative programs than generally applies to CCDF-funded children.

Documenting the eligibility process

While the Lead Agency has considerable flexibility in determining the CCDF eligibility period, such flexibility must be exercised on a rational basis with a programmatic reason for the period chosen. That is, the Lead Agency must be able to articulate the reason for the eligibility period(s) it chooses.

The Lead Agency should articulate in section 4.1 of its CCDF State Plan the time period(s) for eligibility and a rationale for those periods. This is especially important where the Lead Agency establishes a different eligibility period for Head Start, Early Head Start or State pre-K /child care collaborative projects. For example, the Lead Agency could establish a general policy of ongoing, continuous eligibility with a redetermination every 6 months, but provide for a CCDF eligibility period of 2 years for children in Head Start, Early Head Start or State pre-K/child care collaborations.

Considerations

In determining the length of the CCDF eligibility period(s) the following factors should be considered:

- If the Lead Agency chooses to establish a different eligibility period in order to collaborate with Head Start, Early Head Start or pre-K programs, a very careful assessment of the actual need for these services should be conducted to ensure efficient use of CCDF funds.
- The assessment is to ensure that these services are being offered to parents who need them to support continued workforce participation.

A Lead Agency's rationale for its eligibility period(s) – as stated in the CCDF State Plan - should reflect these considerations.

Inquiries

Direct any questions about this issuance to your ACF Regional Office.

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Commissioner
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And Families