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EXPANDING ACCESS TO CHILD CARE ASSISTANCE:
OPPORTUNITIES IN THE CHILD CARE AND DEVELOPMENT FUND ON SIMPLIFYING THE APPLICATION AND STREAMLINING ELIGIBILITY

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This fact sheet is part of a series developed from an in-depth report to help state child care agencies and advocates assess existing policies and identify opportunities to increase access to child care. For additional information and policy considerations, please reference the **full report**: *"Expanding Access to Child Care Assistance: Opportunities in the Child Care and Development Fund."*

SIMPLIFYING THE APPLICATION AND STREAMLINING ELIGIBILITY

Simplifying burdensome and lengthy processes to apply for child care assistance would help more children receive care. Families, especially those with low incomes—along with those who are Black, Latino/Hispanic, Indigenous, and immigrants—face significant challenges in finding care that is accessible and affordable. Complex eligibility rules and applications exacerbate existing barriers to access that lead to only **18 percent** of federally eligible children accessing care. Further, state child care agencies benefit from making their systems simple and accessible and can work more efficiently when their capacity is not strained by overly complicated application processes or eligibility rules. Simplifying the application process can lead to a stronger child care system as a whole.

UPDATES FROM THE MARCH 2024 FINAL RULE

The **final rule** *includes updated requirements and encouragements for states to make the application and eligibility process easier for families and state agencies. For more information, please see CLASP's* **"The Child Care and Development Fund 2024 Rule: Detailed Summary and State Examples."**

- **Presumptive eligibility:** The final rule clarifies that Lead Agencies are encouraged to implement presumptive eligibility policies that offer assistance for up to 90 days while a family's application is being processed.
- **Additional siblings:** The final rule clarifies that Lead Agencies have the flexibility to establish eligibility periods longer than 12 months. This flexibility allows the eligibility period for existing children receiving a subsidy to align with a sibling's eligibility period.
- **Online applications:** The final rule requires that Lead Agencies offer an **online subsidy application** for families or that they demonstrate why the implementation of an online subsidy application is impracticable in their Chil Care and Development (CCDF) State Plan.
- **Posting sliding fee scales:** The final rule requires Lead Agencies to post information about their sliding fee scales for parent co-payments, including policies related to waiving co-payments and estimated co-payment amounts for families on their consumer education websites. Tribal Lead Agencies are exempt from this requirement.

- **Eligibility verification through other programs:** The final rule offers Lead Agencies the option to use documents from other benefit programs to verify CCDF eligibility or use enrollment in these programs to satisfy CCDF eligibility without additional documentation, so long as these programs' eligibility aligns with CCDF.

CURRENT BARRIERS INCLUDE BUT ARE NOT LIMITED TO:

- Applications may not be provided in applicants' native language, complicating their submission of required documentation.
- Families may have limited access to the internet, and states may not have alternative outreach methods.
- Due to historic exclusion, harm, and policing of their actions by the government, families of color, especially Black families may not trust state-administered applications.
- Unclear eligibility rules, lengthy applications, and waitlists create uncertainty around families' access to care and may deter eligible families from completing their applications.
- States often do not have sufficient funding to administer child care assistance to all families that are eligible for subsidies under federal guidelines, forcing states to implement more restrictive access and eligibility rules to accommodate their funding levels.
- Implementing new application systems can be time-consuming and requires additional resources to revise existing processes that Lead Agencies often do not have.

POLICY CONSIDERATIONS

Simplifying the Application

- Make certain that the application process is **easily accessible and user-friendly**. This includes making sure the application is accessible for people with disabilities, those with limited access to the internet, and people who speak a language other than English.
- Ensure that states provide applicants with various modes for submitting documentation and accessing the application, such as a website, including a **mobile-accessible** version; a phone number or call center; an online portal; and an in-person contact.
- Institute data security measures to minimize or eliminate the potential harm of data-sharing policies on families who are affected by domestic violence.
- Prohibit information sharing between the state child care agency and law enforcement agencies or federal immigration enforcement to **protect families' information**, especially those with mixed-immigration statuses.

Streamlining Eligibility

- Consider creating policies that will support families whose incomes fluctuate by extending the application redetermination period to 24 months.
- Refrain from counting temporary increases in income for eligibility.
- Remove policies that tie work, training, or education schedules and hours to the need for child care.
- Confirm that questions on the application do not explicitly or implicitly require **immigration status information** of anyone other than the child who is receiving assistance.
- Verify eligibility **using programs that overlap** in eligibility requirements, such as SNAP, WIC, and Medicaid, to streamline eligibility.
- Expand the definition of children in protective services to best reach the most vulnerable children.

SIMPLIFYING DOCUMENTATION

- Simplify documentation requirements. Ask only for documentation and verification information that **directly impacts eligibility**.
- Allow flexibility about what documentation is needed and accepted for verification.
- Implement a **presumptive eligibility** phase to provide parents with the ability to self-certify their eligibility for a specified amount of time (up to 90 days) and receive immediate care while the final decision on their eligibility is completed.

PROMISING STRATEGIES

- **Kentucky** created **categorical eligibility** for all child care workers in licensed and certified programs. This means they will automatically qualify for subsidies.
- **Connecticut** allows for children's **information to be verified** through TANF, SNAP, or medical programs. If the child's information cannot be verified by other programs, families are asked for other records such as a birth certificate or school or medical records.
- **Minnesota** created the **MNBenefits website**, which permits families to apply to several public assistance programs such as SNAP, TANF, and child care assistance. This allows families to have a more streamlined process when accessing several programs. Minnesota also allows families to **self-verify their identity** if other documentation, such as a driver's license or birth certificate, is not available.
- **California** allows parents to **report their income** in various ways, such as with pay stubs; an independent letter from their employer, including wage information; their most recent tax returns; or any additional documentation that supports the parent's reported income, including self-certification.
- **Delaware, Maryland, Montana, and Wyoming, among other localities,** have a **presumptive eligibility policy** that allows families to enroll their children in child care for 30 to 60 days while families complete the eligibility verification process.

Note: The barriers and considerations outlined above are not comprehensive. For a more detailed list, please visit the full report.

For questions or additional information, please contact Rachel Wilensky at rwilensky@clasp.org.

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