Extending and Aligning Redetermination Periods

Introduction

Research on continuity of care has found that instability is particularly high with low-income families. This is important because continuity has been linked to positive child development and secure attachments between children and teachers. Extending eligibility redeterminations to 12 months or more provides both financial stability for families and continuous early care and education for children. Practical alignment of Child Care and Development Fund (CCDF) policies on redetermination with other assistance programs helps families keep their subsidies by simplifying the eligibility process and also saves workers’ time and agency costs.

Benefits

Extending eligibility periods to 12 months and aligning with other programs:

- **Promotes continuity of care for children.** The proposed rule would require States to re-determine eligibility no sooner than 12 months following the initial determination, allowing qualified children to remain eligible until the next scheduled redetermination. This change offers uninterrupted periods of care for children and provides continuity for families who often lose subsidies for reasons unrelated to their eligibility.

- **Increases participation by licensed child care providers.** Child care providers rely on stable enrollments and consistent revenues to operate and improve quality. Keeping families eligible for longer periods promotes the participation of providers in the subsidy program.

- **Eliminates duplication of effort for families.** Aligning redetermination and reporting requirements with other programs such as the Supplemental Nutrition Assistance Program (SNAP), Medicaid, and Head Start reduces the burden on parents to report the same information to multiple programs. To reduce the need for parents to report changes, Lead Agencies can rely on sharing information across programs to update changes in income, and work, education and training activities.

- **Reduces administrative workload.** Extending redetermination periods is an opportunity for Lead Agencies to streamline the eligibility process. Processing fewer redeterminations reduces workload and allows Lead Agencies to shift resources to other priorities, such as promoting higher quality care and developing effective alternatives for ensuring program integrity.

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Top 5 Policies and Practices

What key policies should Lead Agencies consider to promote continuity of care for children, increased participation by providers, and streamlined processes for families?

- **Extend redetermination cycles.** Many families who lose their subsidy at redetermination reapply and come back shortly after they leave. This is especially true for families that lose eligibility because they miss deadlines or do not comply with other rules. The disruption affects the child and the family and can result in placing qualified families onto waiting lists. Lead Agencies can also consider extending redetermination cycles for longer periods for families with children enrolled in Early Head Start, Head Start, or pre-Kindergarten programs.

- **Streamline program operations and create administrative efficiencies.** Sharing data across programs and aligning redetermination periods reduces the need for families to report and verify the same information for multiple programs.

- **Extend eligibility periods to encourage greater participation by the licensed provider community.** Child care businesses need stable enrollments and revenues to operate and maintain or improve quality. Knowing that subsidy enrollments are stable encourages providers to accept subsidy children into care. Outreach and consumer education efforts, especially during the transition to extended eligibility periods, can increase access to higher quality care. Improved communications and partnerships with providers regarding eligibility rules and outcomes allow providers to assist families in meeting reporting deadlines.

- **Simplify or eliminate rules that have little or no impact on eligibility or benefits.** Family-friendly processes offer the opportunity to use program resources more efficiently. Establishing strategies, such as providing telephone and electronic change reporting options, simplified redetermination forms, and fixed family copayments between redeterminations can reduce staff workload and burden on families.

- **Consider other cost effective options for program integrity monitoring.** Lead Agencies can expand the use of systems and other data reporting sources to monitor changes in eligibility and benefit levels. By tracking and evaluating redetermination outcomes (including causes of interruptions in eligibility, benefit changes, and improper payments), Lead Agencies can develop less labor-intensive strategies for monitoring error prone circumstances.

**Progress**

The following questions can help Lead Agencies evaluate their progress in implementing these policies:

- Have you planned for or implemented redetermination periods of 12 or more months?
- Does your IT system currently support the need to implement longer eligibility periods?
- Do you coordinate child care eligibility and share case information with other programs?
- If you require interim change reporting, have you simplified rules and considered other family-friendly policies?