



Appendix to the 2020 CCDF Policies Database Book of Tables

**Child Care Subsidy Policies in Response to the COVID-19 Pandemic
From January 2020 to March 2021**

OPRE Report 2022-152

APPENDIX TO THE 2020 CCDF POLICIES DATABASE BOOK OF TABLES: CHILD CARE SUBSIDIES
DURING THE COVID-19 PANDEMIC

OPRE Report 2022-152

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ABOUT THE CCDF POLICIES DATABASE

The CCDF Policies Database project is maintained by the Urban Institute under funding from the Office of Planning, Research, and Evaluation, Administration for Children and Families, U.S. Department of Health and Human Services, with funds set aside for research in the Child Care and Development Block Grant Act. This project produces a comprehensive, up-to-date database of child care subsidy policies for the 50 States, the District of Columbia, and the US territories and outlying areas. The database contains hundreds of variables designed to capture the CCDF policies across time. The data are made available for public use; for more information visit <https://ccdf.urban.org>.

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Overview

Introduction

The Child Care and Development Fund (CCDF) provides federal money to States, Territories, and Tribes to subsidize the cost of child care for low-income working families.¹ Whether families are eligible for child care assistance and how much assistance they receive depends in large part on the policies set by each jurisdiction. Detailed policies vary widely across jurisdictions. This report serves as an appendix to the report “Key Cross-State Variations in CCDF Policies as of October 1, 2020” (available at <https://ccdf.urban.org>), which provides detailed information about State and Territory CCDF policy variations as of October 1, 2020. This report provides supplemental information about how states changed their policies in response to the COVID-19 pandemic.

Primary Research Questions

This report focuses on State and Territory CCDF policies in response to the COVID-19 pandemic. This report addresses whether states and territories made changes to the following policies:

- Family eligibility policies
- Application and redetermination policies
- Income and copayment policies
- Provider payment policies
- Provider health and safety policies

This report includes policies related to the COVID-19 pandemic that were in effect *at any point between January 31, 2020, when COVID-19 was declared a public health emergency, and March 1, 2021*, when States/Territories began the annual data review process for the CCDF Policies Database (See “Methods” section for more information about the review process). We asked States/Territories to confirm information on COVID-related policies that were in effect at any point during that period.

Purpose

The CCDF Policies Database project produces a comprehensive, up-to-date database of CCDF policies for the 50 States, the District of Columbia, and five U.S. Territories and outlying areas.² The database contains hundreds of variables designed to capture CCDF policies across time, allowing users to access

¹ In addition to providing subsidies for working families, CCDF may also support parents in education and training programs as well as parents looking for employment.

² The CCDF Policies Database does not include information on tribal CCDF policies.

policy information for a specific point in time as well as to see how and when policies change over time. The database is funded by the Office of Planning, Research, and Evaluation (OPRE) and maintained by the Urban Institute.

Highlights

Highlights from CCDF policy changes in response to the COVID-19 pandemic include:

- In response to the COVID-19 pandemic, 23 States/Territories made changes to their job search eligibility policies (table 1). Of these, 16 expanded the amount of time they allowed for job search, 5 began allowing job search for initial eligibility rather than only allowing job search for families already receiving subsidies, 1 allowed eligible families who lost their jobs due to COVID-19 to receive a temporary child care subsidy benefit for 60 days of job search while still not allowing job search for general eligibility, and 1 newly allowed job search as an approved activity for eligibility.
- Twenty-three States/Territories established different income eligibility thresholds for families with essential workers at some point during the pandemic (table 1). Eighteen of these States waived eligibility thresholds for essential workers entirely. Four States/Territories established higher eligibility thresholds for essential workers than for other families. One state, Florida, initially waived eligibility thresholds for essential workers, before setting the initial eligibility threshold at 85 percent of state median income.
- Thirty-eight States/Territories waived copayments for at least some time during the period between January 31, 2020 and March 1, 2021 (table 3). Of these, 35 States/Territories waived copayments for all families, West Virginia waived copayments for families with essential workers, Nevada waived copayments for families that experienced a job loss, and New Jersey waived copayments upon request for families that experienced job loss or lost wages due to COVID-19.

Methods

The information in the database, and thus the information in the tables, is based primarily on the documents that caseworkers use as they work with families and providers (often termed “caseworker manuals”). The initial set of manuals coded for the database reflected policies in effect on or before October 1, 2009. Ongoing policy updates have been collected since that point to capture policy changes when they occur in each State/Territory.

Each year, the project produces a set of tables containing selected policies from the database. The tables are then reviewed by State/Territory administrators and verified for accuracy. (Because verification of the 2020 tables took place in the spring of 2021, when many State/Territory administrators were focused on emergency needs in their States/Territories resulting from the COVID-19 pandemic, fewer States/Territories are considered “fully verified” than in some previous

years. See “Key Cross-State Variations in CCDF Policies as of October 1, 2020” for more information.) The policies presented in this report were reviewed as part of the annual review process. The full database containing all of the variables and longitudinal details is also made available for public use at <https://ccdf.urban.org>.

Glossary

CCDBG: Child Care and Development Block Grant

CCDF: Child Care and Development Fund

Child Care Subsidies During the COVID-19 Pandemic

In response to the changing needs of families and child care providers during the COVID-19 pandemic, States and Territories adapted their Child Care and Development Fund (CCDF) programs to further support families in need of child care assistance and providers experiencing pandemic-related fluctuations in enrollment and income.³ Program changes were geared toward addressing the increased economic hardship of families (e.g., lowering or suspending the family's copayment or share of the child care cost), the need for assistance for parents who lost employment (e.g., expanding eligibility for periods of job search), and the needs of essential workers (e.g., waiving some eligibility requirements for these workers), as well as stabilizing payments to providers when enrollment fluctuated, providing additional resources to help with the increased health and safety costs, and modifying certain existing health and safety requirements.⁴

The Child Care and Development Block Grant (CCDBG) Act of 2014 allows the Secretary of Health and Human Services the option to temporarily waive requirements in certain circumstances. States and Territories may apply for time-limited waivers in response to extraordinary circumstances such as the COVID-19 pandemic. Waiver approval is at the discretion of the Secretary and must be linked to the extraordinary circumstance at the time of the request. Many policies presented in this appendix were allowable only under approved CCDF waivers for COVID-19, while others were allowable under the existing flexibility of CCDF regulations.⁵ The policies in this appendix are taken from the CCDF Policies Database, a project funded by the Office of Planning, Research, and Evaluation within the Administration for Children and Families.⁶ The policies in the database are collected from each State's/Territory's caseworker manuals and ongoing policy updates, allowing users to see how and

³ CCDF is a federal block grant program that provides funds to States, Territories, and Tribes to help subsidize child care for families with lower incomes. "States/Territories" is used throughout this appendix to refer to the 50 States, the District of Columbia, American Samoa (AS), the Commonwealth of the Northern Mariana Islands (MP), Guam (GU), Puerto Rico (PR), and the Virgin Islands (VI). The CCDF Policies Database and this appendix focus on State/Territory CCDF policies and do not cover Tribal CCDF policies.

⁴ The Office of Child Care placed certain restrictions on changes requested by States, Territories, and Tribes.

⁵ See <https://www.acf.hhs.gov/occ/training-technical-assistance/office-child-care-covid-19-resources> for more information on CCDF waivers and supports during the COVID-19 pandemic. In cases where the State/Territory policies appear to conflict with what was allowed under official waiver guidelines, the States/Territories may have used separate state funding to provide care under those circumstances.

⁶ The data are available for public use through annual published reports and access to the full database detail at <https://ccdf.urban.org>.

when policies change over time. The policies presented here were reviewed for accuracy by each State/Territory.⁷

This appendix includes policies related to the COVID-19 pandemic that were in effect *at any point between January 31, 2020, when COVID-19 was declared a public health emergency, and March 1, 2021*, when States/Territories began the annual data review process for the CCDF Policies Database. We asked States/Territories to confirm information on COVID-related policies that were in effect at any point during that period.

The appendix tables show whether each State/Territory made specific types of policy changes related to:

- **Eligibility policies**, including job search eligibility as well as income thresholds and priority policies for parents who were considered essential workers during the pandemic (table 1)
- **Application and redetermination policies**, including whether families could apply in person for subsidies, verification requirements, reporting requirements, and the length of the redetermination period (table 2)
- **Income and copayment policies**, including the treatment of unemployment income when determining family eligibility and copayments and whether copayments were waived for any families (table 3)
- **Provider payment policies**, including payments for child absences or provider closings and increases to provider payment (reimbursement) rates (table 4)
- **Provider health and safety policies**, including waiving any background checks, certain health and safety training requirements, and certain health and safety checklist and inspection requirements (table 5)

The appendix tables also provide additional details about the policies, including cases when a State/Territory adopted different policy responses throughout the pandemic. Information about when policies were adopted, and for how long, can be found in the full CCDF Policies Database.

⁷ Each year, State/Territory administrators and program staff are asked to review and verify the data in the annual report. For the 2020 Key Cross-State Variations report, see: Minton, Sarah, Kelly Dwyer, and Danielle Kwon (2022). Key Cross-State Variations in CCDF Policies as of October 1, 2020: The CCDF Policies Database Book of Tables. OPRE Report 2022-60, Washington, DC: Office of Planning, Research, and Evaluation, Administration for Children and Families, U.S. Department of Health and Human Services. The data in the report represent a subset of the data in the database. Some States/Territories were not able to complete the review this year, particularly in light of the review process falling at the same time as the COVID-19 pandemic. For the information shown in this appendix about the COVID-19 policy response, the majority of States/Territories (50 out of 56) reviewed the materials and any issues that were raised were fully resolved. In three States/Territories (New Jersey, North Carolina, and the Virgin Islands), we were able to verify some of the information in the tables but had outstanding questions left after the verification period. In three cases (American Samoa, Kentucky, and Puerto Rico), the State/Territory was unable to review the tables.

Changes to Eligibility Policies

Extended Job Search Eligibility

Parents searching for a job may need child care so that they can attend interviews, work on resumes, or submit job applications. During the COVID-19 pandemic, when many families faced unemployment, several States/Territories expanded their CCDF eligibility for job search in order to provide child care support for parents looking for work.

As of October 1, 2019, prior to the start of the COVID-19 pandemic, 51 States/Territories allowed parents to participate in job search and become or remain eligible for a subsidy. Of these, 32 only allowed job search for families already enrolled in the subsidy program, while 19 allowed job search at initial application as well. States/Territories also varied in the amount of time they allowed parents to search for a job, ranging from 30 days per year to the remainder of the family's eligibility period.⁸

In response to the COVID-19 pandemic:

- Twenty-three States/Territories made changes to their job search eligibility policies (table 1).
- Of these, 16 expanded the amount of time they allowed for job search, five began allowing job search for initial eligibility rather than only allowing job search for families already receiving subsidies, one provided a temporary subsidy for families who experienced job loss while still not allowing job search for general eligibility, and one newly allowed job search as an approved activity for eligibility.

Eligibility Policies for Essential Workers

During the COVID-19 pandemic, when much of the country was under some form of stay-at-home order, employees in certain sectors critical to the continuity of fundamental services were deemed “essential workers” and therefore exempt from stay-at-home orders. States/Territories established their own definition of who was an essential worker, but many considered workers in the following sectors essential: energy, child care, water and wastewater, agriculture and food production (including grocery stores), construction trades, transportation, social service organizations, emergency services, and healthcare.⁹

⁸ The 2019 policy information is available from the CCDF Policies Database. See <https://ccdf.urban.org> for more information.

⁹ See “COVID-19: Essential Workers in the States”, available at <https://www.ncsl.org/research/labor-and-employment/covid-19-essential-workers-in-the-states.aspx>

Many essential workers with children struggled to secure reliable child care during the COVID-19 pandemic.¹⁰ Increasing costs of child care, paired with low wages of some essential workers, and fewer open providers meant that finding affordable and reliable child care was difficult for essential workers.¹¹ However, under the existing flexibility of CCDF regulations, extraordinary circumstances waivers for COVID-19, and provisions in the Coronavirus Aid, Relief, and Economic Security (CARES) Act and Consolidated Appropriates Act of 2021, States/Territories could expand their CCDF eligibility requirements to allow greater eligibility for essential workers.¹²

Many States/Territories adopted policies to address the needs of essential workers during the pandemic:

- To determine if a family is initially eligible for CCDF, the family's income is compared to a maximum income amount, or eligibility threshold, which is determined by the States/Territories within federal guidelines. Twenty-three States/Territories established different eligibility thresholds for families with essential workers at some point during the pandemic (table 1). Eighteen of these States waived eligibility thresholds for essential workers entirely. Four States/Territories established higher eligibility thresholds for essential workers than for other families, ranging from 200 percent to 300 percent of the Federal Poverty Guidelines. One state, Florida, initially waived eligibility thresholds for essential workers, before setting the initial eligibility threshold at 85 percent of state median income.
- In addition to raising eligibility thresholds, some States/Territories established priority for families of essential workers, meaning that they were not subject to a waiting list if there was one in place. Eight States/Territories guaranteed subsidies to children of essential workers, and nine States/Territories gave priority but did not guarantee subsidies to these children (table 1).

¹⁰ Tomer, Adie, and Joseph Kane. 2020. [To protect frontline workers during and after COVID-19, we must define who they are](#). Washington, DC: Brookings Institution.

¹¹ Workman, Simon, and Steven Jessen-Howard. 2020. [The True Cost of Providing Safe Child Care During the Coronavirus Pandemic](#). Washington, DC: Center for American Progress. Bipartisan Policy Center. 2020. [Nationwide Survey: Child Care in the Time of Coronavirus](#). Washington, DC: Bipartisan Policy Center.

¹² CCDF regulations allow states to classify some groups as needing protective services. For these groups, States/Territories may apply different policies, such as allowing them to qualify for CCDF at different income levels or with different activity requirements, prioritizing care for them, or waiving copayments. For more information on how States/Territories were encouraged to utilize their flexibility to support essential workers during the pandemic,, see "CCDF Frequently Asked Questions in Response to COVID-19" available at <https://www.acf.hhs.gov/occ/faq/ccdf-frequently-asked-questions-response-covid-19>.

TABLE 1

CCDF Eligibility Policies Enacted at Any Time Between January 31, 2020 and March 1, 2021 in Response to the COVID-19 Pandemic¹

State/Territory	If job search eligibility was extended due to the pandemic	If essential workers were eligible at different income thresholds	If families with essential workers received priority
Alabama	Yes ²	Yes, income threshold waived ³	Priority over other children, subsidy not guaranteed ⁴
Alaska	Yes ⁵	No	No
American Samoa	No	No	No
Arizona	Yes ⁶	Yes, higher threshold ⁷	No
Arkansas	No	Yes, income threshold waived ⁸	Subsidy guaranteed
California	No	Yes, income threshold waived	Priority over other children, subsidy not guaranteed ⁹
Colorado	Yes ¹⁰	Yes, income threshold waived	No
Connecticut	Yes ¹¹	No	No
DC	No	No	No
Delaware	No	No	No
Florida	Yes ¹²	Yes, income threshold waived, higher threshold ¹³	Priority over other children, subsidy not guaranteed
Georgia	Yes ¹⁴	No	Priority over other children, subsidy not guaranteed ¹⁵
Guam	NA, job search not approved	Yes, higher threshold ¹⁶	Priority over other children, subsidy not guaranteed
Hawaii	Yes ¹⁷	No ¹⁸	No
Idaho	No	No	NA ¹⁹
Illinois	No	Yes, income threshold waived	Subsidy guaranteed
Indiana	Yes ²⁰	No	Subsidy guaranteed
Iowa	No	No	No
Kansas	Yes ²¹	Yes, higher threshold ²²	No
Kentucky	No	Yes, income threshold waived	No
Louisiana	Yes ²³	Yes, income threshold waived ²⁴	Priority over other children, subsidy not guaranteed
Maine	Yes ²⁵	Yes, income threshold waived	Subsidy guaranteed
Maryland	No	Yes, income threshold waived	No
Massachusetts	Yes ²⁶	No	No
Michigan	No	No	NA ²⁷
Minnesota	No	No	No
Mississippi	Yes ²⁸	Yes, income threshold waived ²⁹	Priority over other children, subsidy not guaranteed ³⁰
Missouri	Yes ³¹	No	No
Montana	No	No	No
Nebraska	No	No	NA ³²
Nevada	No	No	No
New Hampshire	Yes ³³	No	No
New Jersey	No	Yes, income threshold waived ³⁴	No
New Mexico	No	Yes, income threshold waived	No

TABLE 1

CCDF Eligibility Policies Enacted at Any Time Between January 31, 2020 and March 1, 2021 in Response to the COVID-19 Pandemic¹

State/Territory	If job search eligibility was extended due to the pandemic	If essential workers were eligible at different income thresholds	If families with essential workers received priority
New York	No	No	No
No. Mariana Islands	No	No	Subsidy guaranteed
North Carolina	No	Yes, higher threshold ³⁵	Subsidy guaranteed
North Dakota	Yes ³⁶	No	NA ³⁷
Ohio	No	No	Priority over other children, subsidy not guaranteed ³⁸
Oklahoma	Yes ³⁹	Yes, income threshold waived ⁴⁰	NA ⁴¹
Oregon	No	No	No
Pennsylvania	No	No	No
Puerto Rico	No	No	No
Rhode Island	Yes ⁴²	No	NA ⁴³
South Carolina	No	Yes, income threshold waived	Subsidy guaranteed
South Dakota	No	No	No
Tennessee	Yes ⁴⁴	Yes, income threshold waived	No
Texas	Yes ⁴⁵	Yes, income threshold waived ⁴⁶	No
Utah	Yes ⁴⁷	Yes, income threshold waived	Subsidy guaranteed ⁴⁸
Vermont	No	No	Priority over other children, subsidy not guaranteed ⁴⁹
Virgin Islands	No	No	No
Virginia	NA, job search not approved	No	No
Washington	No	No	No
West Virginia	No	Yes, income threshold waived	NA ⁵⁰
Wisconsin	Yes ⁵¹	No	NA ⁵²
Wyoming	No	No	No

Source: CCDF Policies Database

¹ This table shows policies related to the COVID-19 pandemic that were in effect at any point between January 31, 2020, when COVID-19 was declared a public health emergency, and March 1, 2021, when States/Territories began the annual data review process for the CCDF Policies Database. We asked each State/Territory to confirm information on COVID-related policies that were in effect at any point during that period. Not all States/Territories were able to complete the review, especially in light of the review process falling at the same time as the COVID-19 pandemic. The table shows whether each policy was in place at any point during the pandemic. The footnotes provide additional details about the policies, including cases when a State/Territory adopted different policy responses throughout the pandemic. Information about when policies were adopted, and for how long, can be found in the full CCDF Policies Database.

² In response to the COVID-19 pandemic, all participating families were authorized for six months of job search.

³ Health care providers and caregivers with children through age 12 could qualify for child care assistance as a protective services group, and eligibility was not based on the parent's income.

⁴ Health care providers and caregivers with children through the age of 12 years could qualify for child care assistance as a protective services group. This group was eligible regardless of the parent's income.

⁵ Job search was allowed for initial application and for longer than three months between August 31 and September 30, 2020.

⁶ The job search eligibility period was extended for three months for cases that would have exhausted their job search period in March or April 2020.

TABLE 1

CCDF Eligibility Policies Enacted at Any Time Between January 31, 2020 and March 1, 2021 in Response to the COVID-19 Pandemic¹

- ⁷ Families of essential workers were eligible with income up to \$65,000 per year.
- ⁸ Essential workers were eligible on a case-by-case basis.
- ⁹ Higher priority was given to families of essential workers whose total family income did not exceed the current income eligibility threshold and who were not able to work remotely. Lower priority was given to families of essential workers whose total family income exceeded the current income eligibility threshold and who were not able to work remotely. For two-parent households, both parents were required to either be essential workers, or the other parent must have been unable to provide care for the child due to incapacitation. Children with parents who were essential workers automatically met the eligibility criteria for care. Families enrolled during the pandemic were authorized for emergency child care through June 30, 2020 and not the full 12-month eligibility period. After June 30, 2020, services for families enrolled in COVID-19 emergency child care as of June 30, 2020 were extended for an additional 90 days of care. All families who met eligibility and need requirements and who were previously enrolled in emergency child care prior to June 30, 2020, had priority for enrollment into ongoing subsidized child care over any other family on the waiting list.
- ¹⁰ The job search period was extended to 24 weeks between May 1, 2020 and August 31, 2020.
- ¹¹ If a parent reported a job loss due to COVID-19, they could remain eligible for the subsidy until the end of their eligibility period.
- ¹² Job search was allowed for initial and continuing eligibility due to the COVID-19 pandemic
- ¹³ Essential health care workers and first responders were eligible based on the issuance of a referral by their employer. Income thresholds for essential workers were waived through July 31, 2020. Starting on August 1, 2020, essential workers were eligible with income up to 85 percent of state median income and families that were already receiving services in this category were allowed to remain eligible. The state did not allow new families in this category to establish initial eligibility under this program beginning August 1, 2020.
- ¹⁴ Families who experience a permanent loss of employment or could not attend an education or training program due to matters related to COVID-19 could continue child care services at the current level through the end of their current eligibility period. The family did not have to report the permanent loss of activity.
- ¹⁵ In response to the COVID-19 pandemic, families with essential workers were given priority. Essential workers included law enforcement, public safety, first responder personnel, medical personnel and support staff, pharmacy personnel, and child care personnel.
- ¹⁶ Essential workers were eligible with income up to 200 percent of the Federal Poverty Guidelines.
- ¹⁷ Families who did not have an activity currently, lost their activity, or whose activity hours were limited or reduced due to the pandemic were eligible for subsidies.
- ¹⁸ Income limits were temporarily waived for all families in response to the COVID-19 pandemic.
- ¹⁹ This State does not have priority policies. All CCDF-eligible children receive the same priority.
- ²⁰ The job search eligibility period was extended due to the COVID-19 pandemic.
- ²¹ The job search period was extended to the end of the eligibility period.
- ²² Beginning on April 16, 2020, the state provided child care assistance to essential workers earning less than 250 percent of the Federal Poverty Guidelines for six months through the Hero Relief Program. On September 1, 2020, the Hero Relief Program cases were renewed for another six months.
- ²³ In response to the COVID-19 pandemic, families could be approved for up to 90 days of job search for initial and continuing eligibility.
- ²⁴ In response to the COVID-19 pandemic, families with essential workers were eligible for child care assistance without consideration of income.
- ²⁵ The job search eligibility period was extended due to the COVID-19 pandemic.
- ²⁶ In response to the COVID-19 health emergency, families could be approved for job search for up to 26 weeks or the end of the 12-month eligibility period, whichever was sooner.
- ²⁷ This State does not have priority policies. All CCDF-eligible children receive the same priority.
- ²⁸ When disaster or emergency conditions are declared, the agency may initiate an extended period of job search at which time new redetermination dates will be set. Families would have 60 days from the day that the declared emergency ended to complete job search activities or enroll in an approved educational program.
- ²⁹ When disaster or emergency conditions have been declared, the agency may designate an emergency priority population in order to address the need of emergency personnel during declared emergencies. In response to the COVID-19 pandemic, families with essential workers, including first responders, law enforcement, fire responders, health care workers, staff at care facilities, research personnel, and sanitation workers, could apply for an emergency certificate for up to 90 days of care. The emergency certificate could be renewed for

TABLE 1

CCDF Eligibility Policies Enacted at Any Time Between January 31, 2020 and March 1, 2021 in Response to the COVID-19 Pandemic¹

- additional 30-day periods on a case-by-case basis. Parents who qualified for this priority population were served without regard to income and were exempt from paying a copayment.
- ³⁰ When disaster or emergency conditions have been declared, the agency may designate an emergency priority population in order to address the need of emergency personnel during declared emergencies. In response to the COVID-19 pandemic, families with essential workers, including first responders, law enforcement, fire responders, health care workers, staff at care facilities, research personnel, and sanitation workers, could apply for an emergency certificate for up to 90 days of care. The emergency certificate could be renewed for additional 30-day periods on a case-by-case basis. Parents who qualified for this priority population were served without regard to income and were exempt from paying a copayment.
- ³¹ In response to the COVID-19 pandemic, job search was also approved for initial eligibility.
- ³² This State does not have priority policies. All CCDF-eligible children receive the same priority.
- ³³ Families approved for subsidies under the job search activity could continue receiving subsidies until August 31, 2020. If the parent did not engage in another approved activity by August 31, their eligibility was terminated thereafter.
- ³⁴ In response to the COVID-19 pandemic, families with essential workers were eligible for child care assistance without consideration of income.
- ³⁵ Essential workers were eligible with income up to 300 percent of the Federal Poverty Guidelines.
- ³⁶ In response to the COVID-19 pandemic, job search was also approved for initial eligibility.
- ³⁷ This State does not have priority policies. All CCDF-eligible children receive the same priority.
- ³⁸ Ohio licensed temporary pandemic child care programs to serve families of essential workers (health, safety, and other essential services).
- ³⁹ Eligible families who lost their job due to COVID-19 could receive a temporary child care subsidy benefit for 60 days of job search.
- ⁴⁰ Children of essential workers were considered to be in protective services.
- ⁴¹ This State does not have priority policies. All CCDF-eligible children receive the same priority.
- ⁴² The job search period may be extended based on the needs of the family due to COVID-19.
- ⁴³ This State does not have priority policies. All CCDF-eligible children receive the same priority.
- ⁴⁴ Families that no longer met the minimum work hour requirement at redetermination because of a change due to the COVID-19 pandemic were given a 90-day job search period. If the family met the minimum work hour requirement during the 90-day period, the family was approved for a full 12-month eligibility period. If the family was not able to meet the minimum work hour requirement during the job search period, their eligibility ended at the end of the 90 days.
- ⁴⁵ The eligibility period could be extended due to the COVID-19 pandemic. COVID-19 essential workers approved for care were only eligible for three months.
- ⁴⁶ Children of essential workers were considered to be in protective services.
- ⁴⁷ Families who became unemployed due to reasons related to the COVID-19 pandemic were approved for an additional 12 months of care to allow families to search for a job and not lose their subsidy eligibility.
- ⁴⁸ Emergency personnel and first responders who were required to work to protect the public were not required to complete the subsidy application process to access the temporary emergency child care program that was offered between March 30, 2020 and June 30, 2020. There was no waiting list, and all eligible families qualified for the temporary emergency child care assistance.
- ⁴⁹ New families with essential workers still needed to apply and be found eligible for subsidies.
- ⁵⁰ This State does not have priority policies. All CCDF-eligible children receive the same priority.
- ⁵¹ Time spent searching for a job between March 31, 2020 and June 30, 2020 was not counted toward the three-month job search time limit.
- ⁵² This State does not have priority policies. All CCDF-eligible children receive the same priority.

Changes to Application and Redetermination Policies

Family Application Policies

Within their emergency flexibilities, States/Territories also made changes to their policies for how families apply for subsidies and what types of information families must verify at application.

- Two States, California and Rhode Island, no longer allowed families to apply in person at child care agency offices. Other States/Territories modified their application procedures by allowing families to submit applications online or through drop boxes, among other changes (table 2).
- Four States waived some of their regular verification requirements. These waivers included extending the amount of time parents had to submit documentation to verify initial eligibility and changing the required documentation. One State, Georgia, waived the requirement to report changes in certain activities during the eligibility period (table 2).

Extended Redetermination Periods

Families who participate in the State's/Territory's CCDF program are eligible to receive a subsidy for a set period of time, called a redetermination, recertification, or eligibility period. At the end of that time period, a family's eligibility is reevaluated to determine if they can continue to receive a subsidy. While eligibility periods are generally set at 12 months, States/Territories have the flexibility to set longer eligibility periods.¹³ During the COVID-19 pandemic, families may have faced changes in their circumstances (e.g., a loss of employment) that could affect eligibility at redetermination. Families and caseworkers may also have faced challenges in completing the redetermination process, with stay-at-home orders and other safety measures potentially presenting a challenge to gathering and submitting documentation.

As of October 1, 2019, prior to the pandemic, almost all States/Territories had a redetermination period of 12 months, while Hawaii and American Samoa had redetermination periods of 6 months, and Nebraska had a redetermination period of 18 months.¹⁴

¹³ For more information on how States/Territories were encouraged to utilize their existing flexibility for setting eligibility periods during the pandemic, see "CCDF Frequently Asked Questions in Response to COVID-19" available at <https://www.acf.hhs.gov/occ/faq/ccdf-frequently-asked-questions-response-covid-19>.

¹⁴ The 2019 policy information is available from the CCDF Policies Database. See <https://ccdf.urban.org> for more information.

In response to the COVID-19 pandemic:

- Thirty-three States/Territories chose to extend their redetermination periods (table 2).
- Many States/Territories extended the period by three to six months, but some extended the redetermination period for an extra 12 months.

TABLE 2

CCDF Application and Redetermination Policies Enacted at Any Time Between January 31, 2020 and March 1, 2021 in Response to the COVID-19 Pandemic¹

State/Territory	If the state still allowed families to apply in person for subsidies	If any of the regular verification requirements were waived ²	If any of the regular reporting requirements were waived	If the redetermination period was extended during the pandemic
Alabama	Yes	No	No	No
Alaska	Yes ³	No	No	No
American Samoa	Yes	No	No	No
Arizona	Yes	No	No	Yes ⁴
Arkansas	Yes	No	No	Yes ⁵
California	No ⁶	No ⁷	No	No
Colorado	Yes	No	No	Yes ⁸
Connecticut	NA, in-person applications not previously allowed	No	No	Yes ⁹
DC	Yes ¹⁰	No	No	Yes ¹¹
Delaware	Yes	No	No	Yes ¹²
Florida	Yes ¹³	No	No	Yes ¹⁴
Georgia	Yes ¹⁵	No	Yes ¹⁶	No ¹⁷
Guam	Yes	No ¹⁸	No	Yes ¹⁹
Hawaii	Yes	No	No	No
Idaho	Yes	No	No	No
Illinois	Yes	No	No	Yes ²⁰
Indiana	Yes	No	No	Yes ²¹
Iowa	Yes	No	No	No
Kansas	Yes	No	No	Yes ²²
Kentucky	Yes	No	No	No
Louisiana	Yes	No	No	Yes ²³
Maine	Yes	Yes ²⁴	No	Yes ²⁵
Maryland	NA, in-person applications not previously allowed	No ²⁶	No	Yes ²⁷
Massachusetts	Yes ²⁸	No ²⁹	No ³⁰	Yes ³¹
Michigan	Yes	No	No	Yes ³²
Minnesota	Yes	No	No	Yes ³³
Mississippi	NA, in-person applications not previously allowed	No	No	Yes ³⁴
Missouri	Yes	Yes ³⁵	No	Yes ³⁶
Montana	Yes	No	No	No
Nebraska	Yes	No	No	Yes ³⁷
Nevada	Yes	Yes ³⁸	No	Yes ³⁹
New Hampshire	Yes	No	No	Yes ⁴⁰
New Jersey	Yes	No	No	No
New Mexico	Yes	No	No	No
New York	Yes	No	No	Yes ⁴¹
No. Mariana Islands	Yes	No	No	No
North Carolina	Yes	No	No	Yes
North Dakota	Yes	No	No	No

TABLE 2

CCDF Application and Redetermination Policies Enacted at Any Time Between January 31, 2020 and March 1, 2021 in Response to the COVID-19 Pandemic¹

State/Territory	If the state still allowed families to apply in person for subsidies	If any of the regular verification requirements were waived ²	If any of the regular reporting requirements were waived	If the redetermination period was extended during the pandemic
Ohio	Yes	No	No	Yes ⁴²
Oklahoma	Yes	No	No	Yes ⁴³
Oregon	Yes	No	No	No
Pennsylvania	Yes	No	No	Yes ⁴⁴
Puerto Rico	Yes	No	No	No
Rhode Island	No	No	No	Yes ⁴⁵
South Carolina	Yes	No	No	No
South Dakota	Yes	No	No	Yes ⁴⁶
Tennessee	Yes	No	No	Yes ⁴⁷
Texas	Yes	No ⁴⁸	No	No
Utah	Yes	No	No	No ⁴⁹
Vermont	Yes	No	No	Yes ⁵⁰
Virgin Islands	Yes	No	No	No
Virginia	Yes ⁵¹	No	No	Yes ⁵²
Washington	Yes	No	No	No
West Virginia	Varies ⁵³	No ⁵⁴	No	No
Wisconsin	Yes	Yes ⁵⁵	No	Yes ⁵⁶
Wyoming	Yes	No	No	No

Source: CCDF Policies Database

¹ This table shows policies related to the COVID-19 pandemic that were in effect at any point between January 31, 2020, when COVID-19 was declared a public health emergency, and March 1, 2021, when States/Territories began the annual data review process for the CCDF Policies Database. We asked each State/Territory to confirm information on COVID-related policies that were in effect at any point during that period. Not all States/Territories were able to complete the review, especially in light of the review process falling at the same time as the COVID-19 pandemic. The table shows whether each policy was in place at any point during the pandemic. The footnotes provide additional details about the policies, including cases when a State/Territory adopted different policy responses throughout the pandemic. Information about when policies were adopted, and for how long, can be found in the full CCDF Policies Database.

² The general policy is shown in the tables and special policies for essential workers are described in the footnotes.

³ Offices were closed during the pandemic, but families could continue to submit applications in person through a drop box.

⁴ Eligibility periods were extended for three months for families with cases ending in March, April, or May 2020.

⁵ Redeterminations were suspended due to the COVID-19 pandemic.

⁶ Due to the COVID-19 pandemic, applications could be submitted online using digital signatures and electronic submission of supporting documentation.

⁷ Verification requirements were waived for essential workers applying for child care assistance during the COVID-19 pandemic. Families enrolling as an essential worker were required to self-certify their income in order to prioritize income eligible families over non-income-eligible families.

⁸ Eligibility periods were extended from 12 to 15 months for families with cases ending between May 1, 2020 and August 31, 2020.

⁹ The redetermination period was extended for families with cases ending in March, April, or May 2020.

¹⁰ Families could submit new applications for subsidies at drop box locations set up in response to the COVID-19 pandemic. Families who dropped off documents for processing could expect a phone call from a caseworker to conduct a phone interview regarding their eligibility.

TABLE 2

CCDF Application and Redetermination Policies Enacted at Any Time Between January 31, 2020 and March 1, 2021 in Response to the COVID-19 Pandemic¹

- ¹¹ Families whose 12-month eligibility expired during the public health emergency remained eligible for subsidized child care until the District government resumed in-person operations. Families were to receive a notice in the mail with a request to come in and recertify after the public health emergency was lifted.
- ¹² Families eligible for redetermination between March and August 2020 had their subsidies automatically renewed for six months due to COVID-19.
- ¹³ Applications were required to be submitted in person if assistance was required.
- ¹⁴ Redeterminations were suspended from March 15, 2020 to August 15, 2020 due to the COVID-19 pandemic.
- ¹⁵ Families were allowed to apply in person, if needed, on Tuesdays and Thursdays.
- ¹⁶ Parents who permanently lost their employment or stopped attending an education or training program due to matters related to COVID-19 could continue child care services at the current level through the end of their current certification period. The parent did not need to report this permanent loss in activity.
- ¹⁷ If the parent was not meeting state-approved activity requirements at their annual redetermination as a result of circumstances related to COVID-19, the lack of an activity did not impact eligibility.
- ¹⁸ Verification requirements were waived for essential workers for 30 days after application.
- ¹⁹ Eligibility periods could be extended for up to 6 months beyond the typical 12-month eligibility period during the COVID-19 public health emergency.
- ²⁰ Cases ending in March, April, May, June, or December 2020 and January and February 2021 were extended for three months.
- ²¹ Cases ending between April and August 2020 were extended for four months due to the COVID-19 pandemic.
- ²² All child care cases eligible for redetermination in March, April, May, or June 2020 were automatically renewed for 12 months due to COVID-19.
- ²³ The redetermination period was extended for three months for families with cases ending in March, April, and May 2020.
- ²⁴ Verification requirements were waived for 60 days due to the COVID-19 pandemic.
- ²⁵ Families with cases eligible for redetermination were extended by 90 days to allow additional time to provide documentation.
- ²⁶ Initial applicants were required to meet all eligibility requirements when applying for child care subsidies. Essential workers applying for essential personnel child care were only required to submit an application stating they were an essential worker.
- ²⁷ The eligibility period was extended for 52 weeks for families with cases ending between March and September 2020.
- ²⁸ Staff were required to create a process to exchange documents in a way that was flexible for different parents' needs and could include, but were not be limited to, email, fax, and no-touch drop off. For virtual redetermination, documentation could be exchanged in advance, but staff were to make every effort to meet with parents by video or phone appointment to counsel parents and answer any questions. Staff were required to be sensitive to the different technology capabilities of parents and make accommodations as needed.
- ²⁹ Staff were required to create a process to exchange documents in a way that was flexible for different parents' needs and could include, but were not be limited to, email, fax, and no-touch drop off. For virtual redetermination, documentation could be exchanged in advance, but staff were to make every effort to meet with parents by video or phone appointment to counsel parents and answer any questions. Staff were required to be sensitive to the different technology capabilities of parents and make accommodations as needed.
- ³⁰ During June and July 2020, as child care reopened following the COVID-19 closures, parents did not have to give two weeks' notice to change providers. The state covered the cost of the original provider through the month of July and covered the parent's new provider starting the child's first day of care.
- ³¹ Beginning July 2, 2020, families due for redetermination had their eligibility automatically extended for six months.
- ³² The eligibility period was extended for six months for families with cases ending in March, April, May, or June 2020.
- ³³ In response to the COVID-19 health emergency, families due for redetermination from March 27, 2020 through June 30, 2020 had their eligibility automatically extended for three months.
- ³⁴ When disaster or emergency conditions are declared, the agency may waive the redetermination requirement during the declared emergency and issue a temporary certificate for 90 days. The agency could renew the temporary certificate for additional 30-day periods on a case-by-case basis.

TABLE 2

CCDF Application and Redetermination Policies Enacted at Any Time Between January 31, 2020 and March 1, 2021 in Response to the COVID-19 Pandemic¹

- ³⁵ Due to the COVID-19 health emergency, a client statement could be accepted as documentation for verification if the client was unable to obtain the requested documentation due to the COVID-19 pandemic, and their statement of income, job loss, reduced hours, or other need was determined to be reasonable by the caseworker.
- ³⁶ As a result of the COVID-19 health emergency, a three-month extension was added to the current 12-month certification period for all families required to re-certify during the months of April, May, and June 2020. Cases that would have expired on April 1, 2020 were extended through June 30, 2020. Cases that would have expired on May 1, 2020 were extended through July 31, 2020. Cases that would have expired on June 1, 2020 were extended through August 31, 2020.
- ³⁷ Due to the COVID-19 pandemic, all cases that were due for redetermination in April and May 2020 were extended an additional six months.
- ³⁸ Families with cases ending in March, April, May, or June 2020 were not required to report changes and were given an additional eligibility period without need for documentation.
- ³⁹ Families with cases ending in March, April, May, or June 2020 were given an additional eligibility period without need for documentation.
- ⁴⁰ As a result of the COVID-19 health emergency, cases that would have expired between March through June 2020 were extended beyond the 12-month eligibility period. Cases that would have expired in March 2020 were extended through July 2020. Cases that would have expired in April 2020 were extended through August 2020. Cases that would have expired in May 2020 were extended through September 2020. Cases that would have expired in June 2020 were extended through October 2020.
- ⁴¹ Policy coded for New York City. Districts could allow families who were not receiving public assistance, and who would otherwise need to have their eligibility for child care assistance redetermined within the period of the disaster recovery, an additional 30 days to complete such redetermination. Districts were required to continue to provide child care services to such families during the extended redetermination period. If additional waiver periods were approved, cases could be extended for additional 30-day increments beyond the initial 30 days. Cases could only be extended for a maximum total of 90 days regardless of how many waiver periods were approved.
- ⁴² As a result of the COVID-19 health emergency, all caretakers who had not already been approved for a new eligibility period and with eligibility periods set to expire in March 2020 through July 2020 had their eligibility extended as follows: eligibility periods ending in March were extended to September 2020; eligibility periods ending in April were extended to October 2020; eligibility periods ending in May were extended to November 2020; eligibility periods ending in June were extended to December 2020; eligibility periods ending in July were extended to January 2021. No further redetermination actions were required by the caretaker or the county agency until January 2021.
- ⁴³ Families due for redetermination in April, May, and June 2020 had their eligibility period extended for six months.
- ⁴⁴ Eligibility periods were extended for an additional 92 days between March 19, 2020 and August 31, 2020.
- ⁴⁵ The eligibility period could be extended due to COVID-19
- ⁴⁶ The redetermination period was extended for three months for families with cases ending in March, April, and May 2020.
- ⁴⁷ Eligibility periods were extended due to the COVID-19 pandemic.
- ⁴⁸ COVID-19 essential workers were only required to verify the legal immigration status of their child.
- ⁴⁹ Families who became unemployed due to reasons related to the COVID-19 pandemic were approved for an additional 12 months of care to allow families to search for a job and not lose their subsidy eligibility.
- ⁵⁰ Families whose eligibility was due to expire between March 29, 2020 and June 6, 2020 received an extension of eligibility to August 29, 2020. This included families with a service need of seeking employment.
- ⁵¹ The requirement for a face-to-face interview was temporarily suspended in response to the COVID-19 pandemic.
- ⁵² Families due for redetermination in April, May, and June 2020 had their eligibility period extended for six months.
- ⁵³ Families were required to apply for child care services via phone call directly with a case manager due to an initial statewide closure of Child Care Resource & Referral offices. Each Child Care Resource & Referral office was responsible for determining the safety level for opening the sites and returning to face-to-face applications.

TABLE 2

CCDF Application and Redetermination Policies Enacted at Any Time Between January 31, 2020 and March 1, 2021 in Response to the COVID-19 Pandemic¹

⁵⁴ Families were permitted to submit all verification documents via fax, mail, drop box, email, smart phone pictures, text, or other forms of electronic submission due to the COVID-19 pandemic.

⁵⁵ During the COVID-19 public health crisis, applicants could self-declare employment and income and did not need to submit documentation.

⁵⁶ All child care cases with redetermination periods due in March, April, May, or June 2020 were granted a one-time extension of three months.

Changes to Income and Copayment Policies

Unemployment Compensation as Countable Income

States/Territories have discretion in how they define a family's countable income when determining CCDF eligibility. During the pandemic, when many families received Unemployment Compensation, States/Territories made decisions about whether to include those benefits as countable income.

Each State/Territory administers their own Unemployment Insurance program, which provides temporary financial assistance to recently unemployed individuals. Applicants must meet work and wage criteria and be unemployed through no fault of their own.¹⁵ In addition to regular unemployment compensation available through each State/Territory, during the pandemic, the federal government extended and increased unemployment compensation through a variety of programs, including the Federal Pandemic Unemployment Compensation (FPUC) program, authorized under the CARES Act and the Consolidated Appropriations Act of 2021. Under FPUC, eligible recipients were entitled to an additional \$600 per week of unemployment compensation (on top of regular state payments) between March 28 and July 31, 2020. After a lapse, additional FPUC payments of \$300 per week resumed on December 27, 2020.¹⁶ Like with regular unemployment compensation, States/Territories had the flexibility to determine whether or not to count FPUC as income when determining family eligibility.¹⁷

State/Territory policies for the treatment of Unemployment Compensation include:

- Forty-seven States/Territories count all income from regular unemployment insurance benefits (table 3). Among these, Delaware usually counts all income from regular unemployment insurance benefits, but exempted this from countable income for four months during the pandemic.
- Twenty States counted the \$600 in FPUC, and 19 States counted the \$300 in FPUC. Of those, Oregon only counted FPUC as income through the end of 2020, and Tennessee only counted FPUC as income at redetermination and did not count FPUC at initial application.

¹⁵ See "Unemployment Insurance" available at https://oui.doleta.gov/unemploy/docs/factsheet/UI_Program_FactSheet.pdf.

¹⁶ See "U.S. Department of Labor Publishes Guidance on Federal Pandemic Unemployment Compensation" available at <https://www.dol.gov/newsroom/releases/eta/eta20200404>. The additional \$300 in benefits, originally in place through March 14, 2021, was extended again by the March 2021 American Rescue Plan. In fall of 2020, many States provided additional benefits for unemployed individuals through a special disaster-related program; the duration of that policy varied across States and is not covered here.

¹⁷ Another type of federal support during the pandemic was the provision of economic impact payments and recovery rebates (stimulus checks). Stimulus checks were not countable income for CCDF eligibility. See "ACF Programs and Increased Income from the CARES Act" available at https://www.acf.hhs.gov/sites/default/files/documents/ana/acf_programs_stimulus_ui_edit.pdf.

Several Territories do not have regular unemployment insurance programs or did not participate in the FPUC program.

Waiving Family Copayments

Families participating in their State/Territory CCDF program are typically required to pay a family fee, often called a “copayment.” States/Territories can set the copayment amount based on family size, income, the number of children in care, or other factors, and some States/Territories categorically exempt certain groups of families from paying copayments. During the COVID-19 pandemic, to help alleviate some of the financial pressures families were experiencing, many States/Territories waived copayments.

- Thirty-eight States/Territories waived copayments for at least some time during the pandemic (table 3).
- Of these, 35 States/Territories waived copayments for all families, West Virginia waived copayments for families with essential workers, Nevada waived copayments for families that experienced a job loss, and New Jersey waived copayments, upon request, for families that experienced job loss or lost wages due to COVID-19.

TABLE 3

CCDF Unemployment Income and Family Copayment Policies Enacted at Any Time Between January 31, 2020 and March 1, 2021 in Response to the COVID-19 Pandemic¹

State/Territory	If the \$600 in additional income from Federal Pandemic Unemployment Compensation was counted as income when determining eligibility and copayments in 2020	If the \$300 in additional income from Federal Pandemic Unemployment Compensation was counted as income when determining eligibility and copayments in 2021	If income from all other unemployment insurance benefits was counted when determining eligibility and copayments	If the state waived copayments
Alabama	No	No	Yes	No
Alaska	Yes	Yes	Yes	Yes, for all families
American Samoa	--- ²	--- ³	--- ⁴	NA ⁵
Arizona	Yes	Yes	Yes	No
Arkansas	No	No	No	Yes, for all families
California	Yes	Yes	Yes	Yes, for all families ⁶
Colorado	No	No	Yes	Yes, for all families ⁷
Connecticut	Yes	Yes	Yes	No
DC	--- ⁸	--- ⁹	Yes	Yes, for all families
Delaware	No	No	Varies ¹⁰	Yes, for all families
Florida	No	No	Yes	Yes, for all families
Georgia	Yes	Yes	Yes	No
Guam	No	No	NA ¹¹	Yes, for all families
Hawaii	No	No	No	Yes, for all families
Idaho	Yes	Yes	Yes	No
Illinois	No	No	Yes	No ¹²
Indiana	Yes	Yes	Yes	No
Iowa	Yes	Yes	Yes	Yes, for all families
Kansas	No	No	Yes	No
Kentucky	--- ¹³	--- ¹⁴	Yes	Yes, for all families
Louisiana	No	No	Yes	Yes, for all families
Maine	Yes	Yes	Yes	Yes, for all families
Maryland	No	No	Yes	Yes, for all families
Massachusetts	No	No	Yes	Yes, for all families
Michigan	No	No	Yes	No

TABLE 3

CCDF Unemployment Income and Family Copayment Policies Enacted at Any Time Between January 31, 2020 and March 1, 2021 in Response to the COVID-19 Pandemic

State/Territory	If the \$600 in additional income from Federal Pandemic Unemployment Compensation was counted as income when determining eligibility and copayments in 2020	If the \$300 in additional income from Federal Pandemic Unemployment Compensation was counted as income when determining eligibility and copayments in 2021	If income from all other unemployment insurance benefits was counted when determining eligibility and copayments	If the state waived copayments
Minnesota	Yes	Yes	Yes	No
Mississippi	No	No	Yes	Yes, for all families
Missouri	Yes	Yes	Yes	No
Montana	No	No	Yes	Yes, for all families
Nebraska	Yes	No	Yes	No
Nevada	Yes	Yes	Yes	Yes, for families that experienced a job loss
New Hampshire	No	No	Yes	Yes, for all families
New Jersey	--- ¹⁵	--- ¹⁶	Yes	Yes, upon request ¹⁷
New Mexico	No ¹⁸	No ¹⁹	No	Yes, for all families
New York	No	No	Yes	Yes, for all families ²⁰
No. Mariana Islands	No	No	Yes	Yes, for all families
North Carolina	No	No	Yes	Yes, for all families
North Dakota	No	No	Yes	Yes, for all families
Ohio	No	No	No	Yes, for all families
Oklahoma	No	No	Yes	Yes, for all families
Oregon	Yes	Yes ²¹	Yes	Yes, for all families
Pennsylvania	No	No	Yes	No
Puerto Rico	--- ²²	--- ²³	--- ²⁴	Yes, for all families
Rhode Island	No	No	Yes	Yes, for all families
South Carolina	Yes	Yes	Yes	Yes, for all families
South Dakota	No	No	Yes	No
Tennessee	Yes ²⁵	Yes ²⁶	Yes	Yes, for all families
Texas	No	No	No	Yes, for all families
Utah	No	No	Yes	Yes, for all families

TABLE 3

CCDF Unemployment Income and Family Copayment Policies Enacted at Any Time Between January 31, 2020 and March 1, 2021 in Response to the COVID-19 Pandemic

State/Territory	If the \$600 in additional income from Federal Pandemic Unemployment Compensation was counted as income when determining eligibility and copayments in 2020	If the \$300 in additional income from Federal Pandemic Unemployment Compensation was counted as income when determining eligibility and copayments in 2021	If income from all other unemployment insurance benefits was counted when determining eligibility and copayments	If the state waived copayments
Vermont	Yes ²⁷	Yes ²⁸	Yes	Yes, for all families ²⁹
Virgin Islands	NA ³⁰	NA ³¹	--- ³²	No
Virginia	No	No	Yes	Yes, for all families
Washington	Yes	Yes	Yes	Yes, for all families
West Virginia	Yes	Yes	Yes	Yes, for essential workers
Wisconsin	No	No	Yes	No
Wyoming	Yes	Yes	Yes	No

Source: CCDF Policies Database

¹ This table shows policies related to the COVID-19 pandemic that were in effect at any point between January 31, 2020, when COVID-19 was declared a public health emergency, and March 1, 2021, when States/Territories began the annual data review process for the CCDF Policies Database. We asked each State/Territory to confirm information on COVID-related policies that were in effect at any point during that period. Not all States/Territories were able to complete the review, especially in light of the review process falling at the same time as the COVID-19 pandemic. The table shows whether each policy was in place at any point during the pandemic. The footnotes provide additional details about the policies, including cases when a State/Territory adopted different policy responses throughout the pandemic. Information about when policies were adopted, and for how long, can be found in the full CCDF Policies Database.

² Information not found in State's/Territory's manual.

³ Information not found in State's/Territory's manual.

⁴ Information not found in State's/Territory's manual.

⁵ American Samoa waived copayments for all eligible families prior to the COVID-19 pandemic.

⁶ Copayments were waived for all families between April 1, 2020 and August 31, 2020. Beginning September 1, 2020, copayments were waived for families where all children in the family who were enrolled in care remained at home for that month, either for distance learning because of closure of the facility, where all currently enrolled children were not able to receive in-person services due to a public health order, or for families sheltering in place.

⁷ Parent fees were waived at the county's discretion.

⁸ Information not found in State's/Territory's manual.

⁹ Information not found in State's/Territory's manual.

¹⁰ Regular unemployment insurance benefits were not counted when determining eligibility and copayments between April 1, 2020 and July 31, 2020.

¹¹ The territory does not have unemployment compensation.

¹² Copayments were reduced to \$1 for all families.

¹³ Information not found in State's/Territory's manual.

¹⁴ Information not found in State's/Territory's manual.

¹⁵ Information not found in State's/Territory's manual.

TABLE 3

CCDF Unemployment Income and Family Copayment Policies Enacted at Any Time Between January 31, 2020 and March 1, 2021 in Response to the COVID-19 Pandemic

- ¹⁶ Information not found in State's/Territory's manual.
- ¹⁷ Upon request, families were eligible to have their copayment waived, if they had experienced job loss or lost wages due to COVID-19.
- ¹⁸ In the case of a public health emergency, the department secretary may disregard certain temporary income, such as federal stimulus payments, unemployment benefits, or hazard pay.
- ¹⁹ In the case of a public health emergency, the department secretary may disregard certain temporary income, such as federal stimulus payments, unemployment benefits, or hazard pay.
- ²⁰ Policy coded for NYC. Districts had the option to waive copayments during the COVID-19 pandemic.
- ²¹ Federal Pandemic Unemployment Compensation was counted through 2020. It was not countable income after January 1, 2021.
- ²² Information not found in State's/Territory's manual.
- ²³ Information not found in State's/Territory's manual.
- ²⁴ Information not found in State's/Territory's manual.
- ²⁵ Federal Pandemic Unemployment Compensation was counted at redetermination only.
- ²⁶ Federal Pandemic Unemployment Compensation was counted at redetermination only.
- ²⁷ Families whose eligibility was due to expire between March 29, 2020 and June 6, 2020 received an extension of eligibility to August 29, 2020. During this period the family experienced no change in their subsidy percentage due to the \$600 and \$300 increases in unemployment compensation. New seeking employment clients that, due to income, did not qualify at 100 percent of the subsidy were offered the service need of Family Support which overrides all income.
- ²⁸ Families whose eligibility was due to expire between March 29, 2020 and June 6, 2020 received an extension of eligibility to August 29, 2020. During this period the family experienced no change in their subsidy percentage due to the \$600 and \$300 increases in unemployment compensation. New seeking employment clients that, due to income, did not qualify at 100 percent of the subsidy were offered the service need of Family Support which overrides all income.
- ²⁹ Between March 15, 2020 and May 31, 2020, the full copayment amount was waived for essential worker families in new child care programs and essential worker families with school-age children due to the COVID-19 pandemic. Between March 15, 2020 and April 4, 2020, the full copayment amount was also waived for all other families. Between April 5, 2020 and May 31, 2020, 50 percent of the full copayment amount was waived for all other families.
- ³⁰ Families in this territory were not eligible to receive additional income from the Federal Pandemic Unemployment Compensation program.
- ³¹ Families in this territory were not eligible to receive additional income from the Federal Pandemic Unemployment Compensation program.
- ³² Information not found in State's/Territory's manual.

Changes to Provider Payment Policies

Policies for Paying Providers on Days Children are Not in Care

States/Territories set their own policies regarding the rules for paying providers. Here we describe the rules for paying providers during closures or child absences. In the next section we present the policies for the reimbursement rates—or amounts—providers can be paid.

The Child Care and Development Block Grant (CCDBG) Act states that States/Territories are required to provide assurance that they will, “implement enrollment and eligibility policies that support the fixed costs of providing child care services by delinking provider reimbursement rates from an eligible child’s occasional absences due to holidays or unforeseen circumstances such as illness.”¹⁸ The COVID-19 pandemic highlighted the importance of such policies as many providers struggled with changes in attendance and fluctuating income.¹⁹

Prior to the COVID-19 pandemic, some States/Territories implemented policies that allowed providers to be paid for days children were not in care due to child absence or provider closure. As of October 1, 2019, prior to the start of the pandemic, 41 States/Territories paid providers for days they were closed, though this sometimes varied based on the type of provider (licensed or unlicensed). Fifty-four States/Territories paid providers for days children were absent.²⁰ The number of days States/Territories paid providers for absences and closures varied by State/Territory. Typically, once a child exceeded the number of allowable absent days or a provider exceeded the number of allowable closure days, the provider would not receive payments from the State/Territory for additional absences or closures.

During the COVID-19 pandemic, States/Territories adopted different policies to address provider closings, child absences, and fluctuations in attendance. These policies included expanding the definitions of approved provider closures to include declared emergencies or disasters and mandatory closures due to shutdowns, including quarantine in the definition of allowable child absences, and paying providers based on enrollment instead of attendance. Paying providers based on enrollment

¹⁸ The Child Care and Development Block Grant Act of 2014 is available at <https://www.congress.gov/113/plaws/publ186/PLAW-113publ186.pdf>.

¹⁹ Child Care Aware of America. 2020. *Picking up the Pieces: Building a Better Child Care System Post COVID-19*. Arlington, VA: Child Care Aware of America.

²⁰ For more information about the 2019 policies see: Dwyer, Kelly, Sarah Minton, Danielle Kwon, and Kennedy Weisner (2020). *Key Cross-State Variations in CCDF Policies as of October 1, 2019: The CCDF Policies Database Book of Tables*. OPRE Report 2021-07, Washington, DC: Office of Planning, Research, and Evaluation, Administration for Children and Families, U.S. Department of Health and Human Services.

allows providers to receive an established payment based on the number of children usually enrolled with the provider, rather than based on the number of children attending care each day, thus allowing for greater stability in provider payments and income. In contrast, payment based on attendance means that providers are paid only for the days children who are registered actually receive care.

For at least some period of time between January 31, 2020 and March 1, 2021:

- Fifty-two States/Territories changed how providers were paid for days children were not in care by increasing the number of allowable absences or closures for which providers could be paid (table 4).
- More than half of those States/Territories paid providers based on enrollment for at least some period of time during the pandemic. The definition of enrollment varied by State/Territory, but generally allowed providers to continue being paid based on the number of children that were registered to be in care as of a certain date.

Enhanced Reimbursement Rates

Each State/Territory establishes the maximum amounts that they will reimburse child care providers caring for children in the subsidy program, often referred to as “maximum reimbursement rates” or “provider payments.”²¹ States/Territories establish reimbursement rates for providers, usually based on a percentage of the market rate for providers in the State/Territory. They also have the option to set levels of reimbursement rates, often called “tiered rates,” at higher levels to reflect increased payments for providers that meet additional criteria outlined by the State/Territory.

In response to the pandemic, some States adjusted their reimbursement rates to reflect additional costs and lost income for providers that remained open.

- Eighteen States adopted COVID-19 specific adjustments to reimbursement rates separate from regularly scheduled adjustments (table 4). Some of these States paid all providers the same higher amount based on their tiered rates system. For example, Rhode Island paid all center-based providers not previously rated with five stars under the Quality Rating and Improvement System (QRIS) the five-star rate, and the previously rated five-star providers a higher rate. Others, like Oklahoma and Arkansas, paid an additional flat dollar amount per day regardless of previous rating.

²¹ The payments made to providers in the CCDF program are often referred to as “maximum reimbursement rates” or “provider payments” but are officially termed “payment rates” in the CCDBG Act and Final Rule. While the terms “maximum reimbursement rates” and “payment rates” are sometimes used interchangeably, “payment rate” is a more general term that includes not only payment on a reimbursement basis, but also alternative payment practices. The term “maximum reimbursement rate” is used in this report to be consistent with the underlying CCDF Policies Database.

TABLE 4

CCDF Provider Payment Policies Enacted at Any Time Between January 31, 2020 and March 1, 2021 in Response to the COVID-19 Pandemic¹

State/Territory	If the state increased the allowable number of absences or closures for which providers could be paid	If the state applied different provider reimbursement rates
Alabama	Yes ²	Yes ³
Alaska	Yes ⁴	No
American Samoa	No	No
Arizona	Yes ⁵	Yes ⁶
Arkansas	Yes ⁷	Yes ⁸
California	Yes ⁹	No
Colorado	Yes ¹⁰	No
Connecticut	Yes ¹¹	No
DC	Yes ¹²	Yes ¹³
Delaware	Yes ¹⁴	Yes ¹⁵
Florida	Yes ¹⁶	No
Georgia	Yes ¹⁷	No
Guam	Yes ¹⁸	No
Hawaii	Yes ¹⁹	Yes ²⁰
Idaho	Yes ²¹	No
Illinois	Yes ²²	Yes ²³
Indiana	Yes ²⁴	No
Iowa	Yes ²⁵	No ²⁶
Kansas	Yes ²⁷	No
Kentucky	Yes ²⁸	Yes ²⁹
Louisiana	Yes ³⁰	Yes ³¹
Maine	Yes ³²	No
Maryland	Yes ³³	Yes
Massachusetts	Yes ³⁴	No
Michigan	Yes ³⁵	No
Minnesota	Yes ³⁶	No
Mississippi	Yes ³⁷	Yes ³⁸
Missouri	Yes ³⁹	No
Montana	Yes ⁴⁰	No
Nebraska	Yes ⁴¹	No
Nevada	Yes ⁴²	No
New Hampshire	Yes ⁴³	No
New Jersey	Yes ⁴⁴	Yes ⁴⁵
New Mexico	Yes ⁴⁶	No ⁴⁷
New York	Yes ⁴⁸	No
No. Mariana Islands	No	No
North Carolina	Yes ⁴⁹	Yes ⁵⁰
North Dakota	Yes ⁵¹	No
Ohio	Yes ⁵²	Yes ⁵³
Oklahoma	Yes ⁵⁴	Yes ⁵⁵
Oregon	Yes ⁵⁶	No
Pennsylvania	Yes ⁵⁷	No
Puerto Rico	No	No
Rhode Island	Yes ⁵⁸	Yes ⁵⁹
South Carolina	Yes ⁶⁰	No
South Dakota	Yes ⁶¹	No
Tennessee	Yes ⁶²	No

TABLE 4

CCDF Provider Payment Policies Enacted at Any Time Between January 31, 2020 and March 1, 2021 in Response to the COVID-19 Pandemic

State/Territory	If the state increased the allowable number of absences or closures for which providers could be paid	If the state applied different provider reimbursement rates
Texas	Yes ⁶³	Yes ⁶⁴
Utah	Yes ⁶⁵	No
Vermont	Yes ⁶⁶	No
Virgin Islands	No	No
Virginia	Yes ⁶⁷	No
Washington	Yes ⁶⁸	No
West Virginia	Yes ⁶⁹	Yes ⁷⁰
Wisconsin	Yes ⁷¹	No
Wyoming	Yes ⁷²	No

Source: CCDF Policies Database

- ¹ This table shows policies related to the COVID-19 pandemic that were in effect at any point between January 31, 2020, when COVID-19 was declared a public health emergency, and March 1, 2021, when States/Territories began the annual data review process for the CCDF Policies Database. We asked each State/Territory to confirm information on COVID-related policies that were in effect at any point during that period. Not all States/Territories were able to complete the review, especially in light of the review process falling at the same time as the COVID-19 pandemic. The table shows whether each policy was in place at any point during the pandemic. The footnotes provide additional details about the policies, including cases when a State/Territory adopted different policy responses throughout the pandemic. Information about when policies were adopted, and for how long, can be found in the full CCDF Policies Database.
- ² From March 16, 2020 through April 2, 2020, providers who closed due to COVID-19 were paid for all emergency closure days. From April 3, 2020 through July 31, 2020, providers who closed due to COVID-19 received a weekly sustainability payment equal to 50 percent of all children enrolled in the facility. Providers who remained open received the sustainability payment and the additional payment for all children attending. From March 16, 2020 through July 31, 2020, the state absentee policy was temporarily suspended due to COVID-19. Providers received payment for children who were absent more than five days, and no doctor's excuse was required.
- ³ Providers caring for children of first responders and health care workers were paid a 25 percent higher reimbursement rate.
- ⁴ Providers caring for children of first responders and health care workers were paid a 25 percent higher reimbursement rate.
- ⁵ Providers were paid based on January 2020 enrollment between March and November 2020.
- ⁶ Providers caring for children of essential workers were paid a higher reimbursement rate equal to 75 percent of the 2018 Market Rate Survey.
- ⁷ Providers were eligible to be paid beyond the number of normally allowable absent days by filling out a waiver request.
- ⁸ Providers accepting child care vouchers during the COVID-19 pandemic were paid an additional \$10 per child for infant and toddlers, an additional \$7 for preschool children, and \$5 for school age children.
- ⁹ From March 18, 2020 through June 30, 2020, providers were paid for days they were closed and not providing services for up to 30 days after closure. Providers who were closed due to COVID-19 and not able to submit their monthly attendance record were paid based on their certified need. Beginning September 1, 2020, providers were paid for up to 14 COVID-19 related non-operational days, in addition to the current non-operational days. Beginning March 19, 2020, providers that remained open during the COVID-19 emergency were paid based on their certified need regardless of attendance. Families certified for a variable schedule and license-exempt providers were reimbursed based on the maximum authorized hours of certified need.

TABLE 4

CCDF Provider Payment Policies Enacted at Any Time Between January 31, 2020 and March 1, 2021 in Response to the COVID-19 Pandemic

- ¹⁰ Between March 18, 2020 and June 30, 2020, counties were given the flexibility to pay for 14 absent days or pay based on enrollment. Between July 1, 2020 and August 31, 2020, counties were required to reimburse five absent days per child per month and had the option to pay for more absences.
- ¹¹ All child care providers were paid based on enrollment for the duration of the public health emergency due to COVID-19.
- ¹² Between March 1, 2020 and April 30, 2020, all providers were paid based on enrollment due to COVID-19. Beginning May 1, 2020, a facility's monthly payment equaled the individual facility's average monthly payment for the current fiscal year from October 1, 2019 through January 31, 2020. Subsidy payments continued using this methodology through September 30, 2020, whether a provider remained closed or chose to open.
- ¹³ Providers were paid at the public health emergency subsidy rate, which temporarily increased subsidy reimbursement rates for licensed child development facilities participating in the District's child care subsidy program, in order to partially offset the effects of increased costs or reduced revenues that subsidy child care providers may have experienced due to the public health emergency resulting from the COVID-19 pandemic.
- ¹⁴ Between April 1, 2020 and December 31, 2020, open providers were paid based on enrollment. Beginning January 1, 2021, open providers were paid based on attendance. Between April 1, 2020 and June 30, 2020, closed providers paying staff were paid 100 percent of the amount paid in February, and closed providers who were not paying staff were paid 20 percent of the amount paid in February. Providers that remained closed after July 6, 2020 or were closed for non-pandemic related reasons were paid based on attendance.
- ¹⁵ Beginning April 15, 2020, enhanced reimbursement allowed providers to apply to be reimbursed for vacant slots for which they were not receiving a subsidy or a private payment. Enhanced reimbursement was offered using CCDF funding beginning February 2021 (between April 15, 2020 and January 31, 2021 enhanced reimbursement was offered using non-CCDF funding).
- ¹⁶ Providers were reimbursed based on enrollment from March 1, 2020 through September 30, 2020. For October 2020, providers were allowed 16 reimbursable absences. For November 2020, providers were allowed 14 reimbursable absences. For December 2020, providers were allowed 12 reimbursable absences. Beginning January 2021, the state returned to normal reimbursement practices for absences.
- ¹⁷ Between April 1, 2020 and October 25, 2020, all providers were paid for any child with an active scholarship who received care at least once since March 1, 2020. This applied to open and closed providers. Beginning October 26, 2020, providers must have been open for care or in an approved temporarily closed status as defined by the agency to receive payment.
- ¹⁸ All child care providers were paid based on enrollment for the duration of the public health emergency due to COVID-19.
- ¹⁹ Providers were paid for full-time care for any caretakers impacted by any federal, state, or county declared emergency proclamation related to a man-made or natural disaster, or public health pandemic situation.
- ²⁰ Providers were paid based on temporary rates established in response to the COVID-19 pandemic.
- ²¹ Providers were paid regardless of attendance or operation.
- ²² All providers were paid based on enrollment due to the COVID-19 pandemic between April 10, 2020 and June 30, 2020 and December 1, 2020 and February 28, 2021.
- ²³ Providers caring for children of essential workers were paid a 30 percent add-on.
- ²⁴ The number of allowable absences increased from 20 to 40.
- ²⁵ All providers were paid based on enrollment due to the COVID-19 pandemic.
- ²⁶ Center-based providers that remained open during the COVID-19 pandemic were eligible to receive an additional \$2,000 per month, and home-based providers that remained open during the COVID-19 pandemic were eligible to receive an additional \$500 per month.
- ²⁷ Benefits were paid to families who pay providers. Benefits continued to be paid to families regardless of attendance so families could continue to pay providers during the COVID-19 pandemic.
- ²⁸ Beginning March 31, 2020, during the COVID-19 health emergency, providers were paid based on the number of children enrolled by the provider and not based on attendance. If a provider had a child currently enrolled in their program and receiving a subsidy, then the program was able to receive payment for that child regardless of if the program was open or closed.

TABLE 4

CCDF Provider Payment Policies Enacted at Any Time Between January 31, 2020 and March 1, 2021 in Response to the COVID-19 Pandemic

- ²⁹ Limited duration child care centers that served children of essential workers were paid the rate charged to private-pay families.
- ³⁰ All providers were paid based on enrollment due to the COVID-19 pandemic.
- ³¹ All open providers were paid Type III center rates between March 1, 2020 and December 31, 2021.
- ³² All providers were paid based on enrollment due to the COVID-19 pandemic.
- ³³ All providers were paid based on enrollment due to the COVID-19 pandemic.
- ³⁴ Providers were paid for all children who had confirmed enrollment, even if the child was not attending. The provider must have been engaged with the family at least twice a month. This engagement could be a verbal check-in by the provider to keep open communication with the parent and to provide educational supports for the children.
- ³⁵ Between March 6, 2020 and June 20, 2020, open and closed providers were paid based on enrollment. Beginning June 21, 2020, providers were paid based on attendance and if they were open.
- ³⁶ Between March 13, 2020 and ending no later than June 30, 2020, payments were allowed for up to one month if a provider closed due to COVID-19. Between June 1, 2020 and January 31, 2021, if the provider closed again, payment was allowed for up to four additional weeks. Beginning February 1, 2021 providers that closed due to COVID-19 were allowed payment for up to six weeks, or an additional six weeks if the provider received payments under previous temporary closure policies. Beginning March 13, 2020, providers were paid for additional days when children were absent beyond the limit, and the family or provider requested an exemption from the absent day limit due to COVID-19.
- ³⁷ When disaster or emergency conditions were declared, providers could be paid based on the number of children enrolled regardless of attendance, as long as the child attended at least one day in the first month of the declared emergency. Beginning August 1, 2020, only centers that were open and serving children were eligible for payment based on enrollment.
- ³⁸ Between April 1, 2020 and June 30, 2020, providers could be paid an enhanced reimbursement rate for families in the priority population that was eligible for emergency certificates, including people that worked as first responders and in healthcare operations. Beginning July 1, 2020, all child care subsidy certificates were paid at the higher enhanced rate.
- ³⁹ Between March 1, 2020 and March 31, 2020, providers were paid no less than the average of their payments for the preceding three months as long as providers paid staff wages while the facility was closed. Between April 1, 2020 and June 30, 2020, providers were paid based on enrollment, not attendance. Beginning July 1, 2020, providers were paid based on attendance. Providers were paid for absences in cases where children were unable to attend child care due to suppressed immune systems or other chronic illness; when the family was under quarantine; if a facility was forced to close due to local government mandate; lack of staffing due to COVID-19 exposure/quarantine; or other mitigating circumstance as approved by the division.
- ⁴⁰ Between March 1, 2020 and May 31, 2020, children did not need to be in attendance for providers to be paid. Providers who remained open were paid the approved authorization amount for a three-month period. Beginning June 1, 2020, providers were paid full authorized amounts for a child who was in attendance at least 85 percent of the time. Beginning September 1, 2020, providers could also be paid for a two-week quarantine for a child.
- ⁴¹ Providers that were open, staffed, and licensed could be paid for days when an eligible child did not receive care from the provider because the child's parent or legal caretaker kept the child home or was unable to utilize care due to the COVID-19 emergency. Providers were paid in accordance with the child's regular attendance schedule and current child care subsidy authorization. No extra hours or days were allowed for absent child billings. This policy was set to terminate 30 days after the COVID-19 state of emergency was lifted.
- ⁴² Licensed providers were paid based on the previous month's enrollment if they were ordered to close by a government agency.
- ⁴³ All providers were paid based on enrollment due to the COVID-19 pandemic.
- ⁴⁴ Between April 1, 2020 and June 30, 2020, all providers were paid based on March 2020 enrollment.
- ⁴⁵ In response to the COVID-19 pandemic, providers caring for children of essential workers were paid a higher reimbursement rate between April 1, 2020 and July 3, 2020.

TABLE 4

CCDF Provider Payment Policies Enacted at Any Time Between January 31, 2020 and March 1, 2021 in Response to the COVID-19 Pandemic

- ⁴⁶ All child care providers were paid based on enrollment for the duration of the public health emergency due to COVID-19.
- ⁴⁷ Providers that remained open were paid an additional \$250 per child in care.
- ⁴⁸ Policy coded for New York City. Districts had the option to expand the maximum total number of days that providers were paid on behalf of a child already in receipt of a subsidy who was temporarily absent from care due to the effects of COVID-19, or the maximum total number of days that providers were paid for being closed due to the effects of COVID-19. This included, but was not limited to, instances where children were absent from care due to the parent or caretaker being furloughed or working from home as a result of the disaster emergency, children were kept home as a precautionary measure to limit exposure to COVID-19, children were temporarily absent due to illness or official quarantine, or programs were closed due to exposure to COVID-19, due to low enrollment as a result of the disaster emergency, or as a precautionary measure to reduce the spread of COVID-19.
- ⁴⁹ All providers were paid based on enrollment due to the COVID-19 pandemic for March 2020. Providers were paid based on February 2020 payments due to the COVID-19 pandemic between April and August 2020. The provider was paid the difference between the amount of care provided and the February 2020 payment amount if more care was provided.
- ⁵⁰ All providers caring for children of essential workers as part of the Emergency Child Care Subsidy Program were paid an enhanced rate.
- ⁵¹ Between March 31, 2020 and June 30, 2020, all providers were paid based on enrollment due to COVID-19. Between July 2020 and November 2020, providers were paid for closures if the closure was verified by the state. Between December 2020 and February 2021, all providers were paid based on enrollment due to COVID-19.
- ⁵² Between March 13, 2020 and December 10, 2020, a provider could be paid for up to 21 pandemic days per fiscal year. A pandemic day was a day the provider was closed in response to the COVID-19 pandemic. This did not apply to In-Home Aides. Beginning March 13, 2020, providers could also be paid for 20 absent days every six months in response to the COVID-19 pandemic. Beginning December 11, 2020, a provider could be paid for up to 35 pandemic days per fiscal year.
- ⁵³ All temporary pandemic child care programs were paid based on the 5-star Step Up to Quality (QRIS) payment categories.
- ⁵⁴ For child care provided during March 2020, providers could receive a one-time adjustment for children in full-time care who did not have enough days to receive payment for days they were absent.
- ⁵⁵ Providers could receive an additional \$5 per day per child to help with lost income due to the COVID-19 pandemic. The child must have been in attendance in order for the provider to receive the additional payment.
- ⁵⁶ Providers were paid in the event of a temporary shutdown due to COVID-19. Providers were paid up to one month after a child who was scheduled to attend was no longer in care due to COVID-19.
- ⁵⁷ Providers were paid in the event of a temporary shutdown due to COVID-19.
- ⁵⁸ All providers were paid based on enrollment due to the COVID-19 pandemic.
- ⁵⁹ Due to COVID-19, all center providers not previously rated as 5 Star were paid the 5 Star rate. All center providers previously rated as 5 Star were paid the ninetieth percentile rates. All family child care home providers were paid the Step 4, Star 5 rate for infants and toddlers and the Step 4 rate for preschool and school age children.
- ⁶⁰ All providers were paid based on enrollment due to the COVID-19 pandemic.
- ⁶¹ Beginning March 1, 2020, licensed and registered providers could be paid for unlimited absent hours for the time the child was not in care for a reason related to COVID-19, including if the child care program was closed to address program needs related to COVID-19; a family chose to keep their child home out of precaution or because the parent was not currently working due to COVID-19; or the family was quarantined at home due to exposure to COVID-19 or a COVID-19 illness.
- ⁶² Between March 1, 2020 and June 30, 2020, all providers were paid based on enrollment due to COVID-19. Between July 1, 2020 and August 31, 2020, only providers who remained open were paid based on enrollment.
- ⁶³ Absences were not required to be reported due to COVID-19, and attendance standards were waived.

TABLE 4

CCDF Provider Payment Policies Enacted at Any Time Between January 31, 2020 and March 1, 2021 in Response to the COVID-19 Pandemic

- ⁶⁴ The state provided 25 percent enhanced rates for regulated providers.
- ⁶⁵ All providers were paid based on enrollment due to the COVID-19 pandemic.
- ⁶⁶ Licensed and registered providers were paid based on the number of children scheduled to attend and not based on actual attendance. Approved relative child care providers were not reimbursed for days the provider was closed.
- ⁶⁷ In response to the COVID-19 pandemic, all providers could receive payment for up to 76 days children were absent.
- ⁶⁸ All providers were paid based on enrollment due to the COVID-19 pandemic.
- ⁶⁹ Providers were paid based on enrollment rather than attendance. Providers that were closed due to the COVID-19 pandemic were paid based on the number of approved days for each child that was enrolled. Providers were reimbursed for the number of approved days listed on the child's certificate, up to a maximum of 22 days. Providers that were open during the COVID-19 pandemic were paid based on enrollment rather than attendance. If a child could not attend, the provider could still bill for the child for the number of approved days listed on the child's certificate, up to a maximum of 22 days. For children who attended, the provider was paid the full number of days they actually provided care, which could exceed 22 days in a month.
- ⁷⁰ Providers who care for children of essential workers were reimbursed at Tier III rates.
- ⁷¹ All providers were paid based on enrollment due to the COVID-19 pandemic.
- ⁷² All providers were paid based on enrollment due to the COVID-19 pandemic.

Changes to Provider Health and Safety Policies

Waiving Provider Health and Safety Requirements

States/Territories are required to establish minimum health and safety standards for providers who care for children receiving a CCDF subsidy. These include policies regarding the physical environment of the facility, infectious diseases, and training. Though many CCDF child care providers are licensed by the State/Territory and therefore must meet all requirements (regarding facility safety, staff training requirements, employee/volunteer criminal history checks, and so on) that are imposed by the license, some providers are not licensed, such as most in-home care providers, relative providers, some family child care homes, and religiously-exempt child care centers. These providers are often referred to as “unlicensed providers,” “legally unregulated providers,” or “providers legally operating without regulation,” and each State/Territory establishes policies for these providers within the framework of the federal requirements.²²

Due to the COVID-19 pandemic, some States/Territories waived some health and safety requirements, such as some criminal background checks, some facility inspections, and training requirements for both unlicensed and licensed providers.²³ Waiving some health and safety requirements may have allowed States/Territories to retain existing providers and more quickly enroll new emergency providers in the program, as providers may have faced challenges completing certain requirements while offices (such as fingerprinting offices) were closed or operating with reduced hours. The Centers for Disease Control and Prevention (CDC) also recommended limiting visitors in child care settings to help control the spread of COVID-19, so some States/Territories may have

²² The CCDF Policies Database captures State/Territory health and safety policies for legally unlicensed home-based providers across five main policy categories, but has not historically collected information on health and safety requirements for licensed providers. These policy categories include background check requirements, health and safety inspections, training requirements, tuberculosis testing, and basic application criteria. This year, during the annual verification process, States/Territories were asked to confirm health and safety policies for both unlicensed and licensed providers. The CCDF Policies Database will continue to track policies for legally unlicensed providers over time, though this report includes information that applies to licensed providers as well. More detailed policies on background checks, health and safety inspections, and CPR and First Aid training for unlicensed providers are included in the annual report “Key Cross-State Variations in CCDF Policies as of October 1, 2020: The CCDF Policies Database Book of Tables.” The CCDF Policies Database does not track health and safety requirements for licensed providers since this information is already available from other sources; see the National Database of Child Care Licensing Regulations at <https://childcareta.acf.hhs.gov/licensing>.

²³ The Office of Child Care placed certain restrictions on waivers related to health and safety requirements.

decided to waive in-person activities like inspections and trainings, or move to virtual options, to comply with this guidance.²⁴

State/Territory policy responses included:

- Thirty-six States/Territories waived some background check requirements for providers at some point during the COVID-19 pandemic (table 5). This includes States/Territories that waived certain types of background check requirements, like background checks with fingerprints, background checks across state lines, and some but not all background checks for certain types of providers.
- Thirteen States/Territories waived some health and safety training requirements (table 5). This includes CPR and First Aid training and other training requirements for licensed and unlicensed providers that required in-person training. States/Territories that required providers to complete trainings virtually are not included in this count, but are noted in table 5.
- Twenty-nine States waived some health and safety checklist or certain inspection requirements (table 5). This includes licensed providers that had some licensing inspections waived and unlicensed providers that are subject to other CCDF lead agency inspections. States/Territories that required providers to complete inspections virtually are not included in this count, but are noted in table 5.

²⁴ For more information on guidance for operating child care facilities during COVID-19, see “Guidance for Operating Child Care Programs during COVID-19” available at <https://www.cdc.gov/coronavirus/2019-ncov/community/schools-childcare/guidance-for-childcare.html#open>.

TABLE 5

CCDF Provider Health and Safety Policies Enacted at Any Time Between January 31, 2020 and March 1, 2021 in Response to the COVID-19 Pandemic¹

State/Territory	If the state waived any background check requirements for providers	If the state waived health and safety training requirements for providers	If the state waived health and safety checklist or some inspection requirements for providers
Alabama	No	No	No
Alaska	Yes ²	No	Yes
American Samoa	Yes ³	No	No
Arizona	Yes ⁴	No ⁵	No ⁶
Arkansas	Yes ⁷	No	No
California	Yes ⁸	No	Yes
Colorado	No	No	Yes
Connecticut	Yes ⁹	Yes	Yes
DC	Yes ¹⁰	No ¹¹	No ¹²
Delaware	Yes ¹³	No	Yes
Florida	No	No	No
Georgia	No	No	No
Guam	No	No	No
Hawaii	Yes ¹⁴	No	Yes
Idaho	No	No ¹⁵	No
Illinois	No	No	No
Indiana	No	No	No
Iowa	Yes ¹⁶	No	Yes
Kansas	Yes ¹⁷	Yes ¹⁸	Yes ¹⁹
Kentucky	Yes ²⁰	Yes	No
Louisiana	Yes ²¹	No	Yes
Maine	Yes	No	Yes
Maryland	Yes ²²	No	No
Massachusetts	Yes ²³	No	Yes
Michigan	No	No	No
Minnesota	Yes ²⁴	No ²⁵	Yes
Mississippi	No	No	No
Missouri	Yes ²⁶	Yes	Yes
Montana	Yes ²⁷	No ²⁸	Yes
Nebraska	Yes ²⁹	No	No
Nevada	No	No	Yes
New Hampshire	Yes ³⁰	No	Yes
New Jersey	Yes ³¹	No	No
New Mexico	No	No	Yes
New York	Yes ³²	Yes	Yes
No. Mariana Islands	Yes ³³	Yes ³⁴	No
North Carolina	Yes ³⁵	Yes	Yes
North Dakota	No	No ³⁶	Yes
Ohio	No ³⁷	Yes	Yes
Oklahoma	Yes ³⁸	No	Yes
Oregon	Yes ³⁹	No ⁴⁰	No ⁴¹

TABLE 5

CCDF Provider Health and Safety Policies Enacted at Any Time Between January 31, 2020 and March 1, 2021 in Response to the COVID-19 Pandemic¹

State/Territory	If the state waived any background check requirements for providers	If the state waived health and safety training requirements for providers	If the state waived health and safety checklist or some inspection requirements for providers
Pennsylvania	Yes ⁴²	Yes	Yes
Puerto Rico	No	No	No
Rhode Island	No	No	No
South Carolina	No	Yes	Yes
South Dakota	Yes ⁴³	No	No
Tennessee	No	Yes	Yes
Texas	No	Yes ⁴⁴	Yes
Utah	Yes ⁴⁵	No	No ⁴⁶
Vermont	Yes ⁴⁷	Yes	Yes
Virgin Islands	No	No	No
Virginia	Yes ⁴⁸	No ⁴⁹	No
Washington	Yes ⁵⁰	No	Yes
West Virginia	Yes ⁵¹	No	No
Wisconsin	Yes ⁵²	No	Yes
Wyoming	Yes ⁵³	No	No

Source: CCDF Policies Database

¹ This table shows policies related to the COVID-19 pandemic that were in effect at any point between January 31, 2020, when COVID-19 was declared a public health emergency, and March 1, 2021, when States/Territories began the annual data review process for the CCDF Policies Database. We asked each State/Territory to confirm information on COVID-related policies that were in effect at any point during that period. Not all States/Territories were able to complete the review, especially in light of the review process falling at the same time as the COVID-19 pandemic. The table shows whether each policy was in place at any point during the pandemic. The footnotes provide additional details about the policies, including cases when a State/Territory adopted different policy responses throughout the pandemic. Information about when policies were adopted, and for how long, can be found in the full CCDF Policies Database.

² The National Sex Offender Registry check and interstate background check requirements were waived for licensed providers due to the COVID-19 pandemic.

³ The fingerprinting requirement was waived for all providers due to the COVID-19 pandemic.

⁴ The National Sex Offender Registry check and interstate background check requirements were waived for all providers due to the COVID-19 pandemic.

⁵ Providers were required to maintain CPR and first aid certification. If classes were unavailable the state could extend the time for completing the training.

⁶ Home inspections were completed virtually due to the COVID-19 pandemic.

⁷ The fingerprinting requirement was waived for all providers due to the COVID-19 pandemic.

⁸ The National Sex Offender Registry check requirement was waived for all providers due to the COVID-19 pandemic.

⁹ The fingerprinting requirement was waived for all providers due to the COVID-19 pandemic.

¹⁰ The interstate background check requirement was waived for all providers due to the COVID-19 pandemic.

¹¹ Health and safety trainings were offered virtually by the agency in response to the COVID-19 pandemic.

¹² The District implemented an optional self-completed health and safety checklist as a resource for child care providers currently operating to support the effective implementation of health and safety guidance during the COVID-19 pandemic. The method of on-site facility inspections was modified to include virtual inspections in response to state and federal health and safety guidance and the anticipated challenges and requirements in the post-health emergency period.

TABLE 5

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- ¹³ Staff could begin working before their fingerprinting appointment and were required to be supervised at all times by a person who had completed a background check. Providers were required to ensure that a staff member had a scheduled fingerprinting appointment with the Delaware State Police before the start of employment. No staff could be alone with children until after a completed background check.
- ¹⁴ Beginning March 20, 2020, background check requirements were waived for fingerprint-based in-state criminal record checks and for search of the FBI criminal repository for the duration of the state-declared emergency period; all other in-state background checks continued to be completed.
- ¹⁵ Providers were allowed to complete CPR and first aid training online.
- ¹⁶ The fingerprinting requirement was waived for all providers due to the COVID-19 pandemic.
- ¹⁷ The fingerprinting requirement was waived for all licensed providers due to the COVID-19 pandemic.
- ¹⁸ Training requirements were waived for all licensed providers due to the COVID-19 pandemic.
- ¹⁹ Certain health and safety requirements were waived for all licensed providers due to the COVID-19 pandemic.
- ²⁰ The fingerprinting requirement was waived for all providers due to the COVID-19 pandemic.
- ²¹ The fingerprinting requirement was waived for all providers due to the COVID-19 pandemic.
- ²² The National Sex Offender Registry check and interstate background check requirements were waived for all providers due to the COVID-19 pandemic.
- ²³ The National Sex Offender Registry, fingerprinting, and interstate background check requirements were waived for all providers due to the COVID-19 pandemic.
- ²⁴ Due to the COVID-19 pandemic, requirements for fingerprint-based background checks, interstate criminal registry checks, NCIC/NSOR checks, and FBI criminal history checks were temporarily waived. In place of fingerprint-based background checks, the state conducted emergency checks using name and date of birth. Following the end of the pandemic declaration, everyone who had completed an emergency check would be required to submit a new background check in order to ensure full compliance with state and federal background check requirements.
- ²⁵ In-person CPR and first aid training requirements for providers were temporarily waived as a result of the COVID-19 health emergency. CPR and first aid trainings were required, but online training could meet the requirement.
- ²⁶ The fingerprinting requirement was waived for all providers due to the COVID-19 pandemic.
- ²⁷ The National Sex Offender Registry, fingerprinting, and interstate background check requirements were waived for all providers due to the COVID-19 pandemic.
- ²⁸ Health and safety orientation training requirements were reduced and were available online during the COVID-19 public health emergency. CPR and first aid training were administered online for new staff during the COVID-19 public health emergency.
- ²⁹ The National FBI Criminal Fingerprint Search Requirement, National Crime Information Center National Sex Offender Registry checks for new and existing providers, and in-state criminal registry check with fingerprinting for existing providers were waived due to the COVID-19 pandemic.
- ³⁰ The fingerprinting requirement was waived for all providers due to the COVID-19 pandemic.
- ³¹ The type of background check waived was not specified.
- ³² The fingerprinting and interstate background check requirements were waived for all providers due to the COVID-19 pandemic.
- ³³ Providers who applied as an emergency relative child care provider were exempted from all background checks except for a police clearance and sex offender registry background check for six months.
- ³⁴ Providers who applied as an emergency relative child care provider were exempt from preservice, CPR, and first aid trainings for six months.
- ³⁵ The type of background check waived was not specified.
- ³⁶ In-person CPR training requirements for providers were temporarily waived as a result of the COVID-19 health emergency. CPR training was required, but online training could meet the requirement.
- ³⁷ New temporary pandemic child care center employees and new family child care program employees could be hired without a completed background check, but were required to complete a background check within seven days of

TABLE 5

CCDF Provider Health and Safety Policies Enacted at Any Time Between January 31, 2020 and March 1, 2021 in Response to the COVID-19 Pandemic¹

- being hired. These individuals were not permitted to be alone with the children until an approved background check was on file.
- ³⁸ The Next Generation Identification FBI fingerprint check, interstate, and provisional hire provision of background check requirements were waived for nonrelative in-home child care programs due to the COVID-19 pandemic.
 - ³⁹ The fingerprinting requirement was waived for all providers due to the COVID-19 pandemic.
 - ⁴⁰ Providers were given 90 days after approval to complete CPR and first aid training. Providers could enroll in online trainings through July 31, 2020.
 - ⁴¹ Home inspections were completed virtually due to the COVID-19 pandemic.
 - ⁴² Background checks with fingerprinting were waived for existing relative providers who did not live within 25 miles of an FBI fingerprinting site. New providers were still required to complete a background check with fingerprints.
 - ⁴³ The interstate background check requirement was waived for all providers due to the COVID-19 pandemic.
 - ⁴⁴ Preservice training requirements were waived due to the COVID-19 pandemic.
 - ⁴⁵ The fingerprinting and interstate background check requirements were waived for all providers due to the COVID-19 pandemic.
 - ⁴⁶ On-site health and safety inspections were waived due to the COVID-19 pandemic. However, virtual inspections were completed for providers whose annual renewal inspection date or required follow-up inspection fell within the current pandemic circumstances.
 - ⁴⁷ The National Sex Offender Registry, fingerprinting, and interstate background check requirements were waived for all providers due to the COVID-19 pandemic.
 - ⁴⁸ If an individual had to use a hard copy fingerprint card process, due to the closure of a fingerprint site during the COVID-19 emergency, individuals were given leniency to work pending fingerprint check results if they were supervised by another person who had a completed fingerprint check. The provider was still required to comply with all requirements once the emergency had passed.
 - ⁴⁹ The CPR and first aid training requirements were waived for caregivers other than the provider due to the COVID-19 emergency. For providers whose CPR, MAT, or first aid certifications expired during the state of emergency, their certifications were extended for 90 days.
 - ⁵⁰ The fingerprinting and interstate background check requirements were waived for all providers due to the COVID-19 pandemic.
 - ⁵¹ The interstate background check requirement was waived for all providers due to the COVID-19 pandemic.
 - ⁵² The FBI fingerprinting requirement was waived between March 24, 2020 and March 15, 2021 due to the COVID-19 pandemic.
 - ⁵³ The interstate background check requirement was waived for all providers due to the COVID-19 pandemic.

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