STATE OF RHODE ISLAND
DEPARTMENT OF HUMAN SERVICES
CONCISE SUMMARY
OF PROPOSED NON-TECHNICAL AMENDMENTS

CONCISE EXPLANATORY STATEMENT

In accordance with the Administrative Procedures Act, R.I. Gen. Laws § 42-35-2.6, following is a concise explanatory statement:

AGENCY: Department of Human Services

DIVISION: Individual and Family Supports

RULE IDENTIFIER: 218-RICR-20-00-4

RULE TITLE: Child Care Assistance Program Rules and Regulations

REASON FOR RULEMAKING: This update aligns the regulation with the 2024 CCDF Final Rule, which requires states to pay child care providers based on enrollment not attendance. Additionally, Rhode Island has been out of compliance with the requirement that child care certification periods must be no less than 12 months, as noted in monitoring feedback from 2023. This amendment addresses both compliance issues, removes the restriction limiting CCAP for College eligibility to associate or bachelor's degrees, and updates outdated language.

ANY FINDING REQUIRED BY LAW AS A PREREQUISITE TO THE EFFECTIVENESS OF THE RULE: None

TESTIMONY AND COMMENTS: There were four (4) comments received.

"We are encouraged to see the proposed shift to a 24-month eligibility period. This change will significantly reduce administrative burdens on both families and providers, easing the challenges associated with frequent recertification. In our experience, most families remain eligible for CCAP for extended periods, and unnecessary re-verification creates disruption rather than meaningful oversight. More importantly, stable, uninterrupted child care supports better developmental outcomes for children. We applaud DHS for recognizing the importance of continuity and stability in child care and for proposing this thoughtful and practical improvement to CCAP eligibility."

"Rhode Island KIDS COUNT strongly supports the proposed change to provide 24-month continuous eligibility for the Child Care Assistance Program. This exceeds the federal minimum standard and will help families, children, and programs. Continuity of care is an important

element to ensure children can maintain relationships with their teachers and caregivers and have access to high-quality learning environments."

"We also support the removal of the requirement that parents must be enrolled in a specific degree program at a Rhode Island public institution of higher education to access a child care subsidy. As more parents pursue certificates and job training at CCRI, RIC, or URI, it is important to provide the flexibility they need to access a child care subsidy."

"Lastly, we support the change to the minimum age for a child to qualify for Child Care Assistance from 1 week to 6 weeks to align with licensing standards, simplification of the asset requirement, and clarification that child care providers are paid based on enrollment and must participate in the BrightStars Quality Rating and Improvement System to maintain their status as a DHS CCAP approved provider."

CHANGE TO TEXT OF THE RULE: There are no changes being made to the text of this rule.

REGULATORY ANALYSIS: In the development of the proposed amendment, consideration was given to: (1) alternative approaches; (2) overlap or duplication with other statutory and regulatory provisions; and (3) significant economic impact on small business. No alternative approach, duplication, or overlap was identified based upon available information.