



## NOTICE OF PUBLIC COMMENT PERIOD

In accordance with G.L. c. 30A, the Board of Early Education and Care (EEC) is proposing amendments to its regulations found at 606 CMR 10.00, pursuant to its authority under G.L. c. 15D, § 3. The proposed amendments are to the Child Care Financial Assistance regulations.

The main goals of these revised regulations are: 1) to increase overall system efficiency; 2) to prioritize family needs and experience; and 3) to modernize and update the overall child care financial assistance system. Specifically, there are forty-one (41) proposed substantive regulatory changes in addition to textual changes to make the regulations more accessible and user-friendly. Some highlights of the proposed substantive changes are:

- Reducing and eliminating unnecessary and duplicative documentation and reporting requirements that create an undue burden for parents applying for and maintaining child care financial assistance;
- Updating the employment definitions and requirements to reflect the changing nature of work, including more flexibility for hourly wage earners and those working from home;
- Adding qualifying service needs for domestic violence, waiving fees for homeless families, and easing and updating reporting requirements for individuals with disabilities or participating in treatment for substance abuse;
- Amending the definitions of possible sanctions to clarify the intentional nature of program violations and eliminating the imposition of penalties and loss of financial assistance for clear mistakes or missing or incorrect paperwork with no clear intent to defraud; and
- Aligning regulations and requirements with associated agencies like DTA and DCF to streamline processes and reduce administrative burdens for EEC, those agencies, and applicants.

At the December 13, 2022, EEC Board meeting, Board Members voted to adopt these regulations in draft form and to provide for an extended public comment period.

Accordingly, EEC will accept comments on the proposed regulations via e-mail to [christine.mcgrath@mass.gov](mailto:christine.mcgrath@mass.gov), or in writing to Department of Early Education and Care, 50 Milk Street, 14th Floor, Boston, MA 02109 ATTN: CHILD CARE FINANCIAL ASSISTANCE REGULATIONS: LEGAL until 5:00 p.m. on February 17, 2023. To obtain a copy of the proposed regulations, please visit EEC's website at [www.mass.gov/eec](http://www.mass.gov/eec).

### Small Business Impact Statement

(As required by M.G.L. c. 30A §§ 2, 3 & 5)

CMR No: 606 CMR 10.00

Estimate of the Number of Small Businesses Impacted by the Regulation: n/a

Select Yes or No and Briefly Explain

Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/>	Will small businesses have to create, file, or issue additional reports? No, no small businesses will need to create, file, or issue any reports.
Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/>	Will small businesses have to implement additional recordkeeping procedures? No, there are no additional recordkeeping procedures required.
Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/>	Will small businesses have to provide additional administrative oversight? No, small business will not have to implement any additional administrative oversight.
Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/>	Will small businesses have to hire additional employees in order to comply with the proposed regulation? No, small businesses will not need to hire any additional staff.
Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/>	Does compliance with the regulation require small businesses to hire other professionals (e.g. a lawyer, accountant, engineer, etc.)? No, small businesses will not need to hire any additional professionals to maintain compliance.
Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/>	Does the regulation require small businesses to purchase a product or make any other capital investments in order to comply with the regulation? No, small businesses are not required to make any purchases or other capital investments.
Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/>	Are performance standards more appropriate than design/operational standards to accomplish the regulatory objective? (Performance standards express requirements in terms of outcomes, giving the regulated party flexibility to achieve regulatory objectives and design/operational standards specify exactly what actions regulated parties must take.) No, there are no performance standards more appropriate than design/operational standards to accomplish the regulatory objective.
Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/>	Do any other regulations duplicate or conflict with the proposed regulation? No other regulations duplicate or conflict with these regulations.
Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/>	Does the regulation require small businesses to cooperate with audits, inspections or other regulatory enforcement activities? No, the regulation does not require small businesses to cooperate with audits, inspections, or other regulatory enforcement activities
Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/>	Does the regulation require small businesses to provide educational services to keep up to date with regulatory requirements? No, the regulation does not require small businesses to provide educational services to keep up to date with regulatory requirements

Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/>	Is the regulation likely to <i>deter</i> the formation of small businesses in Massachusetts? These regulations will not deter the formation of small businesses and will likely help increase their formation by increasing accessibility to stable child care for workers.
Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	Is the regulation likely to <i>encourage</i> the formation of small businesses in Massachusetts? Yes, the regulations create greater flexibilities and a more user-friendly financial system that could encourage potential formation of more child care providers.
Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/>	Does the regulation provide for less stringent compliance or reporting requirements for small businesses? No, regulation has no impact on compliance and reporting requirements for small businesses.
Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/>	Does the regulation establish less stringent schedules or deadlines for compliance or reporting requirements for small businesses? No, the regulation has no impact on schedules or deadlines for compliance or reporting requirements for small businesses.
Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/>	Did the agency consolidate or simplify compliance or reporting requirements for small businesses? No.
Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/>	Can performance standards for small businesses replace design or operational standards without hindering delivery of the regulatory objective?  No.
Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/>	Are there alternative regulatory methods that would minimize the adverse impact on small businesses?  There are no alternative regulatory methods that would minimize the adverse impact on small businesses – though there are no known adverse impacts on small businesses.