# Four Questions to Ask Your State Right Now

On **July 13, 2026**, the federal CCDF Final Rule took effect and removed four requirements states had been operating under. It did not ban those policies — it made them **optional**. Your state agency now decides whether they continue. Most providers were never notified either way. This is how you find out, and what it means to your cash flow if the answer is no.

## What changed — and what it costs you

REQUIREMENT 01

### Pay by enrollment

States were required to pay providers based on enrolled children, not daily attendance. If this ends, one flu week or one family vacation hits your revenue — while your ratios and payroll stay fixed.

REQUIREMENT 02

### Prospective payment

Payment at the start of the service period, not after. If this ends, you float the state for weeks. This is a working-capital question, not an accounting preference.

REQUIREMENT 03

### 7% copay cap

Family copayments were capped at 7% of household income. If the cap is lifted, the increase does not land on the state. It lands on your families — and the collection conversation lands at your front desk.

REQUIREMENT 04

### Grants & contracts

States were required to use grants or contracts to build supply for infants, toddlers, and children with disabilities. If this ends, the hardest, most expensive rooms lose their support tool.

## Copy this email — send it this week

**Subject:** CCDF policy questions following the 2026 Final Rule

Hello [Agency contact / CCDF Lead Agency],

I am the owner/director of [Program name], a licensed program in [County] serving [#] children, including [#] families using CCDF vouchers.

Following the 2026 CCDF Final Rule that took effect July 13, 2026, I would like to confirm our state's direction on the four rescinded requirements:

1. **Payment basis.** Will the state continue paying providers based on enrollment rather than attendance? If a change is planned, what is the effective date?
2. **Payment timing.** Will payments continue to be issued prospectively, at the start of the service period, rather than retroactively?
3. **Family copayments.** Will the state continue capping family copayments at 7% of family income? If not, what is the new schedule, and how much notice will families receive?
4. **Grants and contracts.** Will the state continue using grants or contracts to support care for infants, toddlers, and children with disabilities?

Finally: how and when will providers be notified of any change, and is there a comment or advisory period where provider input is being collected?

Thank you for your time.
[Name] · [Title] · [Program] · [Phone] · [Email]

## Know your exposure number — 15 minutes

Run this before you need it. It tells you what a switch from enrollment-based to attendance-based payment actually costs your program.

| | | |
|---|---|---|
| A | **Subsidy revenue received, last 6 months** | _____ |
| B | Child-days **actually attended** by subsidy children, same period | _____ |
| C | Child-days **enrolled** for those same children, same period | _____ |
| D | Attendance rate = B ÷ C | _____ |
| E | 6-month exposure = A × (1 − D) | _____ |
| F | Monthly exposure = E ÷ 6 | _____ |

## Then the float test

| | | |
|---|---|---|
| G | Average **monthly** subsidy revenue = A ÷ 6 | _____ |
| H | Cash on hand today (operating + reserve) | _____ |
| I | Can you cover 60 days without subsidy deposits? H ≥ (G × 2) | _____ |

**If I is no:** that is your first action item, ahead of everything else on this page. A line of credit is cheapest to secure while your numbers still look good — not after a payment schedule changes.

## Your next 14 days

- ☐ **Send the email.** Today. Put a calendar reminder to follow up in seven days if there is no reply.
- ☐ **Run the worksheet above.** Know your exposure number before somebody else tells you what it is.
- ☐ **Stress-test 60 days of payroll** assuming retroactive payment. If it does not clear, talk to your bank this month.
- ☐ **Draft the copay letter to families now** — in a calm month, not in the week the change lands. Keep it in a folder until you need it.
- ☐ **Get on your state association's policy list** and read your state's CCDF plan. This is the second time in twelve months the ground moved quietly.

**Where to verify:** 2026 CCDF Final Rule — acf.gov/occ/law-regulation/2026-ccdf-final-rule · NAEYC summary — naeyc.org/our-work/public-policy-advocacy/2026-ccdf-final-rule · Your state's CCDF Lead Agency and current State Plan.

This resource is general information for program operators. It is not legal, tax, or financial advice. Rules vary by state and change; confirm anything that affects your budget directly with your state CCDF lead agency.