

June 9, 2025

CALIFORNIA DEPARTMENT OF SOCIAL SERVICES

EXECUTIVE SUMMARY

CHILD CARE BULLETIN (CCB) NO. 25-15

The purpose of this Child Care Bulletin (CCB) is to provide guidance to counties and child care and development contractors related to the provision of 24-month eligibility pursuant to Assembly Bill (AB) 1808 (Chapter 356, Statutes 2024).



JENNIFER TROIA
DIRECTOR

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DEPARTMENT OF SOCIAL SERVICES
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GAVIN NEWSOM
GOVERNOR

June 9, 2025

CHILD CARE BULLETIN (CCB) NO. 25-15

GUIDANCE TYPE: **DIRECTIVE**

TO: ALL COUNTY WELFARE DIRECTORS
ALL COUNTY CHILD CARE COORDINATORS
ALL WELFARE TO WORK COORDINATORS
ALL COUNTY ELIGIBILITY WORKERS
ALL CONSORTIA REPRESENTATIVES
ALL CHILD DEVELOPMENT CONTRACTORS

SUBJECT: **IMPLEMENTATION OF ASSEMBLY BILL (AB) 1808 (CHAPTER 356, STATUTES 2024)**

APPLICABLE PROGRAMS: GENERAL CHILD CARE AND DEVELOPMENT PROGRAMS (CCTR);
CALIFORNIA FAMILY CHILD CARE HOME EDUCATION NETWORKS (CFCC);
MIGRANT CHILD CARE AND DEVELOPMENT PROGRAMS (CMIG);
MIGRANT CHILD CARE ALTERNATIVE PAYMENT PROGRAMS (CMAP);
ALTERNATIVE PAYMENT PROGRAMS (CAPP);
CHILD CARE AND DEVELOPMENT SERVICES FOR CHILDREN WITH SPECIAL NEEDS (CHAN);
CALIFORNIA WORK OPPORTUNITY AND RESPONSIBILITY TO KIDS (CALWORKS) STAGE ONE, STAGE TWO (C2AP), AND STAGE THREE (C3AP)

REFERENCE: [ASSEMBLY BILL \(AB\) 1808 \(CHAPTER 356, STATUTES 2024\);](#)
[WELFARE AND INSTITUTIONS CODE \(WIC\) 10271; AB 121;](#)
[SENATE BILL \(SB\) 80; ALL COUNTY LETTER \(ACL\) 19-99;](#)
[ALL COUNTY INFORMATION NOTICE \(ACIN\) 1-26-20;](#)

TITLE 5 CALIFORNIA CODE OF REGULATIONS (5 CCR)
SECTION 18082.3;
CHILD CARE BULLETIN (CCB) 25-08

Purpose

The purpose of this Child Care Bulletin (CCB) is to provide counties and child care and development contractors with guidance on 24-month eligibility as enacted by [AB 1808](#) (Chapter 356, Statutes of 2024). Effective January 1, 2025, AB 1808 amends [WIC Section 10271](#) to extend the minimum 12-month eligibility period to 24-months for eligible individuals enrolled in the California Work Opportunity and Responsibility to Kids ([CalWORKs](#)) Child Care Programs.

Background

Pursuant to [SB 1047](#) (Chapter 923, Statutes of 2022), effective January 1, 2023, the minimum 12-month eligibility period was extended to a 24-month period for the following programs:

- General Child Care and Development Programs (CCTR)
- California Family Child Care Home Education Networks (CFCC)
- Migrant Child Care and Development Programs (CMIG)
- Migrant Child Care Alternative Payment Programs (CMAP)
- California Alternative Payment Programs (CAPP)
- Child Care and Development Services for Children with Special Needs (CHAN)

The Department previously released [CCB 22-37](#) and [CCB 22-37E](#) to provide guidance related to 24-month eligibility for these programs. At that time the 24-month eligibility period did not apply to CalWORKs Stage One, Stage Two (C2AP) and Stage Three (C3AP). Recent legislation, [AB 1808](#), repealed WIC Section 10271(h)(5), eliminating the limitation on extending 24-month eligibility to families utilizing Stage One, C2AP and C3AP child care. Effective January 1, 2025, WIC section 10271(h)(1) applies to all child care and development programs, except the Emergency Child Care Bridge Program for Foster Children (Bridge Program).

This CCB supersedes any regulations, All County Letters (ACLs), or CCBs governing CalWORKs Stage One Child Care to the extent they are inconsistent with the eligibility periods described in [AB 1808](#).

Guidance:

Effective January 1, 2025, counties and contractors shall authorize Stage One, C2AP, or C3AP families for no less than 24-months. In addition, this bulletin provides the following guidance and reminders related to this change:

- 1) The extension of C2AP or C3AP child care eligibility to 24-months is not applicable to existing 12-month certifications. Existing certifications will remain in effect and will come up for recertification after 12-months.
- 2) Currently enrolled families in Stage One childcare will complete their current 12-month eligibility cycle and will be recertified for an additional 24-months of eligibility at the time of their next recertification or until they become otherwise ineligible, or the Stage Two administrator confirms that their transfer to Stage Two is complete per [ACL 19-99](#).
- 3) For families enrolled on or after January 1, 2025, per [WIC 10271](#) for C2AP or C3AP and [ACL 19-99](#) for Stage One child care, a family who has been deemed eligible for services shall receive those services for no less than 24-months before having to be recertified and is not required to report changes for at least 24-months with certain exceptions. In C2AP and C3AP, the exceptions to 24-month eligibility are as follows:
 - A family who initially is certified as income eligible voluntarily reports income that exceeds the threshold for ongoing eligibility pursuant to [5 CCR Section 18082.3](#).
 - A family who no longer meets the residency requirements pursuant to [5 CCR Section 18107](#).
 - A family who has abandoned care pursuant to [5 CCR Section 18066.5](#) and the contractor issues a Notice of Action to disenroll the family.
- 4) As a reminder, for families participating in CalWORKs Family Reunification (FR), pursuant to [AB 135](#), CalWORKs FR services, including child care, are authorized for a period of up to six months or for a time period that is based on or in accordance with CWS reunification plan or court order. Participants may be authorized for an additional six months of child care upon extension of their CalWORKs FR plan. If the family reunifies before the six-month interval, the child care services are discontinued. Once the child is reunified with the family of origin and the family is recertified with CalWORKs, the child care services may be authorized for up to 24 months if otherwise eligible, per [CCB 25-08](#).
- 5) In addition to monitoring participants' stability and transitions, counties and contractors shall continue to manage program eligibility. Counties and contractors may discontinue a Stage One Child Care authorization under any of the following circumstances:

- The participant is transferred from Stage One to Stage Two, and the county or contractor receives confirmation from the Stage Two contractor of enrollment in Stage Two or that the family is ineligible. A family engaged in Stage One Child Care shall not be subject to discontinuance due to abandonment of care, per ACL 19-99.
 - The participant exceeds income eligibility of 85 percent of the state median income for their family size [MPP Section 47-230.2](#).
 - If an exempt participant initially volunteers to participate and does not sign a Welfare to Work (WTW) plan to participate in welfare to work activities but later decides not to volunteer to participate.
- 6) As described in [ACL 19-99](#), immediate and continuous eligibility for child care is the concurrent approval of CalWORKs cash aid and authorization for full-time CalWORKs Stage One Child Care services child care is authorized as full-time unless the recipient specifically requests part-time care. As stated in [CCB 24-04](#), part-time child care is defined as care certified for a child for fewer than 25 hours per week, and full-time care is defined as care certified for a child for 25 or more hours per week, pursuant to [WIC Section 10213.5\(a\)\(1\)\(2\)](#); Stage One Child Care begins the date the child care authorization is provided or the first day child care is used, whichever is later.
- 7) Counties and contractors shall continue to manage the participants' transition from Stage One to Stage Two so that participants do not experience a break in child care services as they move between the stages of CalWORKs child care services [ACL 19-99, p.11](#). Regardless of the counties definition of stable or the date of transfer to Stage Two, the initial child care authorization and any reauthorizations shall be for 24-months [ACIN I-26-20, Question 2](#).
- The participant's child care shall continue in Stage One until child care is provided in Stages Two or Three, unless the family is otherwise ineligible [MPP Section 47-301.5](#). Counties must authorize child care in 24-month intervals.
 - Once a 24-month authorization period ends, counties are required to assess each participant's continued eligibility for child care. If the participant remains eligible, they will be authorized for at a minimum 24-months of child care in Stage One or until transferred to Stage Two. However, if the family's situation is not stable or the participant is not able to transfer to another stage, the county shall recertify the participant for another 24-month period, if they are otherwise eligible.
 - Stage One Child Care recipients do not need to recertify child care eligibility more frequently than once every 24-months per ACL 19-99 unless: the recipient indicates that their child care needs have increased, they have a new child who needs care, they have changed child care providers, or the eligible child becomes ineligible. If the recipient initially

utilizes a partial month of child care, it shall count as the first month of the 24-month eligibility period.

- 8) Child care and development programs remain available for children from infancy to 13 years of age, per [WIC Section 10213.5\(j\)](#). Thus, children who are 12 years old when certified must be certified for not less than 12-months per ACL 19-99. If a child turns 13 within the first 12-months of the eligibility period their certification should clearly indicate they are only eligible for 12-months, including time after they turn 13 years. However, their eligibility does not extend 24-months.
 - Children who have reached 13 years of age are generally ineligible for subsidized child care services at initial certification or recertification. [WIC Section 10213.5\(j\)](#). There are limited exceptions to this age limit. Individuals with exceptional needs or severe disabilities, as defined in [WIC Section 10213.5\(l\)\(y\)](#) and in [5 CCR Section 18089](#) may receive services through age 21. However, such children and young adults must have an individual education plan (IEP) and a written medical statement from a physician or licensed/certified psychologist or proof of receiving Supplemental Security Income (SSI)/State Supplementary Program (SSP) benefits in order for their parents to receive CalWORKs Stage One Child Care services for their care.

Delayed Implementation of AB 1808 and Impacts to Services

Due to issues with implementation and automation of this new policy, the CDSS extended the implementation deadline for 24-month eligibility to no later than July 1, 2025. However, any family who received a 12-month certification between January 1, 2025, and July 1, 2025, must be granted an additional 12-months of eligibility before their recertification or next authorization occurs, provided they continue to meet the program's eligibility requirements (e.g., family has not subsequently voluntarily reported being over income, moved out of state, or abandoned care). This will ensure that families receive the full 24-months of eligibility authorized in AB 1808.

State Automated Welfare System (SAWS) Automation:

Counties and contractors shall continue providing limited, read-only online access through the SAWS databases to local administrators providing C2AP and C3AP services as described in [ACL 19-99](#). Until automation occurs, counties and contractors will be responsible for creating a second 12-month child care authorization certificate upon expiration of the initial 12-month certificate. This is to ensure the participant has continuous access to child care services for 24-months without interruption.

Counties and contractors are reminded to continue providing the monthly data report to Stage Two contractors of all families for which:

- The parent's cash aid has been discontinued,
- The parent has not received aid in the last 30 days, and
- The parent has children in the home who are potentially eligible for child care services.

If you are a Stage One Administrator and have any questions regarding the information in this letter, please contact your [Stage One Policy Analyst](#).

If you are a Stage Two or Three Administrator and have any questions regarding the information in this letter, please contact your [Program and Quality Improvement Consultant](#).

Sincerely,

Original Document Signed By

LUPE JAIME-MILEHAM, EdD
Deputy Director
Child Care and Development Division