

Comments from UnidosUS

RE: Discussion Draft on Proposed Changes to CCDF

To Senate HELP Committee Chair Bill Cassidy, Ranking Member Bernie Sanders and Chairman of the Subcommittee on Education and the American Family Tommy Tuberville

UnidosUS is a nonprofit, nonpartisan organization that serves as the nation's largest Hispanic civil rights and advocacy organization. Since 1968, we have challenged the social, economic, and political barriers that affect Latinos through our unique combination of expert research, advocacy, programs, and an Affiliate Network of nearly 300 community-based organizations across the United States and Puerto Rico.

UnidosUS respectfully submits the following comment on the Senate HELP Committee's discussion draft to reauthorize the Child Care and Development Block Grant (CCDBG).

CCDBG is a foundational component of the nation's early childhood system, supporting parental employment, provider stability, and children's access to safe, developmentally appropriate care. As currently structured, the program reflects decades of bipartisan recognition that access to child care is essential to economic participation and child wellbeing. In FY 2023, states and territories served approximately 1.4 million¹ children per month through the Child Care and Development Fund program (CCDF), underscoring both the program's reach and its limitations in meeting the full scope of eligible need.

While the discussion draft is framed as strengthening program integrity, the proposed changes would undermine that goal by introducing administrative complexity, destabilizing care arrangements, and reducing participation among eligible families. These effects are not incidental. They are foreseeable, well-documented, and concentrated among Latino families, particularly those in mixed-status households and those navigating income volatility.

As explained below, the draft risks creating a system that is more administratively restrictive but substantively less accessible, and fails to account for the real-world conditions under which families access and use child care.

I. The Proposal Creates Structural Barriers That Undermine Access and Program Effectiveness

¹ <https://www.acf.hhs.gov/occ/data/fy-2023-ccdf-data-tables-preliminary>

The discussion draft introduces a series of policy changes, including expanded documentation requirements, frequent income verification, elimination of retroactive eligibility, and shifts in provider payment structures.

Individually and collectively, these provisions introduce structural barriers that are inconsistent with how families access child care and how subsidy systems function in practice. Research demonstrates that administrative burden is one of the primary determinants of subsidy access, with documentation requirements, reporting timelines, and recertification processes significantly affecting participation rates².

Critically, research on CCDF administration shows that eligibility on paper does not translate to access in practice; whether families can obtain and retain subsidies depends on their ability to navigate administrative requirements, maintain documentation, and sustain participation over time².

At the same time, federal data show that CCDBG already serves only a fraction of eligible children, indicating that barriers to access are already substantial³. Rather than addressing these gaps, the proposal increases administrative complexity in ways that will predictably reduce participation. Recent federal policy⁴ has moved in the opposite direction. In the 2024 CCDF Final Rule, the U.S. Department of Health and Human Services emphasized reducing administrative burden, improving payment practices, and increasing stability for both families and providers. The discussion draft would reverse these evidence-based improvements in the child care system.

II. The Proposal Would Cause Foreseeable and Documented Harm

A. Administrative Burden Will Reduce Participation Among Eligible Families

The elimination of self-attestation and expansion of documentation requirements will increase application complexity and reduce participation.

This effect is well-established in the literature:

- Administrative burden reduces program uptake even among eligible populations¹
- Documentation requirements disproportionately affect families with unstable income or limited access to formal records

² <https://www.urban.org/research/publication/assessing-child-care-subsidies-through-equity-lens-review-policies-and-practices-child-care-and-development-fund>

³ <https://www.acf.hhs.gov/occ/data>

⁴ <https://www.federalregister.gov/documents/2024/03/01/2024-04139/improving-child-care-access-affordability-and-stability-in-the-child-care-and-development-fund-ccdf>

For Latino families, these barriers interact with broader concerns about interacting with government systems. According to UnidosUS and AP-OD's National Latino Family Survey⁵:

- 32% of Latino families report they may avoid applying for public benefits due to immigration concerns
- 30% of Latino families report they may avoid enrolling their children in early learning programs

Research from CLASP further confirms that increased verification requirements produce chilling effects, reducing participation even when children are eligible⁶. This is not a neutral administrative adjustment. It is a foreseeable reduction in access. National evidence⁷ reinforces this pattern: research has found that 16% of adults in immigrant families avoided noncash benefits due to immigration-related concerns, rising to 26% among low-income immigrant families, with additional evidence showing avoidance driven by fear of information sharing and potential immigration consequences.

B. Income Verification Requirements Will Increase Administrative Churn

The draft's requirement for frequent income verification fails to account for the realities of low-wage work, of which recipients of child care subsidies disproportionately rely on for income. Data from the Bureau of Labor Statistics show that workers in low-wage sectors are more likely to experience:

- Fluctuating income
- Irregular schedules
- Multiple job holding⁸

More importantly, national labor market research⁹ shows that low-income workers experience the highest levels of month-to-month volatility in both earnings and hours, making frequent reverification requirements especially likely to produce administrative churn rather than accurate eligibility determinations.

Survey data³ reinforce this:

⁵ <https://nationalsurvey.ap-od.org/2025-report/>

⁶ <https://www.clasp.org/publications/report/brief/the-way-forward-for-immigrant-access-to-public-benefit-programs/>

⁷ <https://www.urban.org/sites/default/files/publication/103565/immigrant-families-continued-avoiding-the-safety-net-during-the-covid-19-crisis.pdf>

⁸ <https://www.bls.gov/cps/earnings.htm>

⁹ <https://www.brookings.edu/articles/low-income-workers-experience-by-far-the-most-earnings-and-work-hours-instability/>

- 43% of Latino parents report working more than one job
- 59% are actively seeking higher-paying or additional work

Research shows that frequent reporting requirements increase administrative churn, where families lose benefits due to procedural barriers rather than true ineligibility¹. The result is not improved targeting but rather creates instability for families in making care arrangements for their children.

C. Elimination of Retroactive Eligibility Creates a Direct Barrier to Entry

Retroactive eligibility functions as a critical bridge for families navigating application delays. Its elimination shifts financial risk onto families already experiencing economic strain:

- 45% of Latino families reported worsening financial conditions in 2025 compared to 2024
- 37% reported borrowing to meet basic expenses

Without retroactive eligibility:

- Families must front the cost of care
- Enrollment is delayed or forgone
- Coverage gaps increase

This presents a structural disincentive for families to access care. The financial strain on households also reflects broader structural trends in the cost of living. Over the past two decades, the U.S. Consumer Price Index (CPI)¹⁰ increased by 79%, while essential expenses have risen even faster. Between 2000 and 2024, food and housing costs nearly doubled, and child care costs¹¹ increased by 135%. During this same period, wages for working-class Latino families rose only 84%¹², indicating that earnings have not kept pace with the rising cost of basic necessities.

In this context, requiring families to absorb the full cost of care during application processing is not a neutral administrative choice. It is a predictable barrier to entry for families already operating within structurally constrained financial conditions¹³.

D. Data Privacy Concerns Will Suppress Participation

¹⁰ <https://www.bls.gov/cpi/>

¹¹ <https://www.epi.org/child-care-costs-in-the-united-states/>

¹² PRB analysis of data from the 2001–2025 U.S. Census Bureau, Current Population Survey and the U.S. Bureau of Labor Statistics, Consumer Price Index for All Urban Consumers (CPI-U).

¹³ <https://unidosus.org/publications/bipartisan-poll-of-hispanic-voters-the-road-to-2026/>

The expansion of verification systems without explicit data protections raises significant concerns about how family information may be used. Research shows that fear of data sharing reduces participation in public programs, particularly among immigrant communities⁴.

The Latino Family Survey data³ reflect this broader environment:

- 57% of Latino parents worry about deportation of family members

Additional research confirms that immigrant families avoid public programs not only due to eligibility concerns, but due to fear that personal information may be shared across agencies or used for enforcement purposes⁷. In this context, increased data collection without safeguards is not neutral. It changes behavior and trust in government among immigrant communities, including Latinos.

E. Payment Changes Will Destabilize Child Care Providers and Reduce Supply

The shift toward attendance-based reimbursement introduces financial volatility for providers who are already operating within thin margins. Research shows that subsidy policies directly affect provider participation and supply¹.

Latino families³ already rely heavily on community-based care¹⁴:

- 33% rely on grandparents
- 16% rely on informal caregivers

Community-based care providers are least able to absorb payment instability. Reduced provider stability translates directly into reduced access. This proposal would make it harder for providers to continue to operate at a time when families already face limited options for qualified child care.

III. The Proposal Disproportionately Impacts Latino Families

Starting a family, raising children, and caring for loved ones should not require sacrificing economic stability. Yet too many families are forced to choose between a paycheck and taking care of a newborn, between work and a sick family member, and between paying for medication or rent. Prosperity¹⁵ means knowing that your family comes first and that the economy will not

¹⁴ Community-based child care refers to early care and education services delivered in non-institutional, locally rooted settings outside of public school systems, including licensed child care centers, family child care homes, and license-exempt providers that operate within and reflect the cultural, linguistic, and social contexts of the communities they serve.

¹⁵ <https://unidosus.org/wp-content/uploads/2026/03/UnidosUS-Economic-Prosperity-Agenda-2026.pdf>

punish you for it. It means having the time, stability, and resources to care, to heal, and to be present. The cumulative effect of these provisions is not evenly distributed among society.

Latino families are:

- More likely to experience income volatility
- More likely to rely on informal and community-based care
- More likely to navigate immigration-related concerns

Survey data³ demonstrate both need and vulnerability:

- 95% of Latino families say expanding access to affordable child care is important to them
- 32% cite cost as a barrier

This unmet need has direct labor force implications: 24% of Latino parents report reducing work hours due to lack of affordable child care, and 23% report being unable to work for the same reason⁵. Instead of addressing parental challenges with balancing work and children, the proposal increases barriers along all three dimensions: affordability, accessibility, and stability.

IV. Legal Considerations

A. Failure to Consider Foreseeable Harms

The administrative record is clear that increased administrative burden, income volatility, and fear-based disengagement lead to reduced participation among eligible families. Failure to account for these predictable outcomes raises serious concerns under established administrative law principles governing reasoned decision-making.

B. Failure to Consider Reliance Interests

Families and providers rely on:

- Stable subsidy access
- Predictable eligibility rules
- Continuous payment structures

C. Failure to Consider Disparate Impacts

The disproportionate impact on Latino families is foreseeable based on:

- Labor market conditions
- Immigration-related concerns
- Program participation patterns

Research demonstrates that subsidy systems often fail to account for the structural constraints faced by Latino and immigrant families, including documentation barriers, nontraditional work schedules, and limited access to participating providers². Failure to evaluate these impacts raises concerns regarding equitable access and policy design.

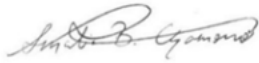
In conclusion, the evidence is clear and consistent:

- Administrative burden reduces access
- Income volatility increases churn
- Financial barriers delay or prevent enrollment
- Trust concerns suppress participation
- Payment instability reduces provider supply

The proposal risks creating a system that is more limited and less functional for the families it was intended to serve. For Latino families, the result is predictable; eligible children will lose access not because they do not qualify, but because the system becomes too difficult, too risky, and too unstable to navigate. Changes to the CCDF that prioritize integrity without equal attention to access undermines the program's core purpose.

Should you have any questions, please contact Hannah Valdiviejas Cohn at hcohn@unidosus.org

Sincerely,



Amalia Chamorro

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