1. Can we add a child in the middle of an eligibility period?

Normally, yes. However, the state is currently restricting the addition of a child in the middle of an eligibility period. We will let you know if and when this restriction is lifted.

Q. Does that child get a new eligibility period, or is it the same as the initial family eligibility period?

The child becomes part of the family eligibility period. As long as the family continues to be eligible for financial aid for child care, the child will continue to receive service.

1. What day are we using for the 13 weeks at initial eligibility; the day before the app?

Generally, the timeframe for an income determination period begins the day prior to the application date. The application date will be the date the customer records in the date field at the upper right corner of page one of the Financial Aid Application Form.

1. What day are we using for the 13 weeks at recertification; since it is a new program detail with a new app, can we use the same date, the day before the app?

Use the 13 weeks before the date of the recertification letter (generally sent 45 days before the end of the recertification month). The recertification month is the last month of a customer’s eligibility period.

1. Are we just using the 85% SMI guidelines or are we still using initial and sustaining?

We continue to have an initial eligibility threshold – 200% of poverty and the sustaining threshold is the 85% SMI.

1. Do foster youth and veterans go on waitlist?

All customers requesting financial aid for child care and determined eligible go on the waitlist until further notice. The exception to this includes customers who are: TANF Applicants, participating in Choices, participating in SNAP E&T, transitioning from Choices, referred by DFPS, or local match customers.

1. When there are excessive absences are we calling or mailing a letter to the parent regarding absences? Who is doing it?

The Call Center will continue to notify customers when a child reaches absence benchmarks.

Q. What are the absence benchmarks and what actions do we take?

We will provide additional guidance on absence benchmarks later. We will address

* What is the role of the payment office?
* Will there be a revised excessive absence notification letter? When?
* When will we notify customers about absence issues?
* Provide additional guidance about the 12 month penalty for more than 65 absences in a year.
* Are children in DFPS or Choices funded care subject to the attendance requirements?

1. Do absences carry over or do we start at zero on October 1?

Absence counts will not restart for currently enrolled children on 10/1.

1. How do we handle overtime in income calculations?

Temporary fluctuations in income, such as overtime, can be averaged over the 3-month period (you may use a period longer than 3 months depending on the customer’s circumstances). However, if the overtime is a regular feature of the customer’s employment, this is not a temporary fluctuation and you would include all the overtime pay in income calculations.

In the case of overtime: first look at base pay.  Then determine if the individual is paid overtime.  If the overtime is temporary or occurs sporadically, establish a frequency and pro-rate the overtime and then establish how much overtime the individual will earn in a normal 13 week period.  Include both the base pay and the pro-rated overtime for the 13 week period.

1. Will we use a standard deduction for self-employment expenses or are we going to require receipts?

We have not made a decision regarding this option. **Discussion**: generally, when doing income tax preparation, the individual has the option to itemize or to accept the standard deduction. We may be able to allow customer choice. If the customer feels that itemizing expenses will result in a lower net income, the customer should have that choice.

1. Should we continue to send out the attendance closure letters for this month? (They have already been sent for this week)

Yes. Continue to use current Child Care Rules through September 30.

1. Will the application be revised? If so, do they plan to add the date of birth back to the application?

Yes, we will revise the application.

1. Will we need to verify residency for our customer? How?

Yes, we will need the customer to document residency. We will provide appropriate documentation sources.

1. How will we request residency for teen parents (high school students)?

There are a number of options. If the teen parent is living with her parents, use the parent’s residency documentation. Alternatively, you can use school enrollment records such as a school schedule.

1. What will the acceptance of the eligibility determination, before fulfillment, look like? (Day 2, session 1, page 5)

The Call Center currently has established time frames for the eligibility determination process. There are no changes to these established time frames.

1. When a parent reports resumption in work/training activities during a 3-month continued care period, how will they be instructed to report this and what (if any) are the documentation requirements?

Generally, we will expect a completed Employer Verification of Employment form for work and documentation of enrollment in education/training from the education/training institution.

Q. Should we ask for a check stub, if they have it?

Yes, you can ask for a check stub – you just need to confirm employment. You are not concerned with the number of hours the customer is working or in an education/training program.

1. How will we handle customers who have already been placed in recoupment for failure to report changes in income or other circumstances not court-ordered? It seems we just determine eligibility as we would for anyone else but do they still have to pay what they owe? State said that they were asking legal - Do we have an answer?

We do not have answers yet. Until we receive guidance to the contrary, the customer should continue the recoupment payments.

1. How will we handle requests to re-calculate income when no change has been reported but the parent wants her fee lowered based on the new rules and income formerly included is now excluded? State said they were asking legal. Presumably we will have to process these requests but there could potentially be a huge number. Maybe this would be a good time to stop determining eligibility for customers just to put them on a waitlist and go back to using a standard waitlist that does not consist of customers who have been determined eligible.

There is no change to our process of determining eligibility. We will review this process and inform you of changes if and when we make them.

We review a customer’s income for eligibility and parent share of cost purposes at initial eligibility and at redetermination. During a customer’s eligibility period, if the customer has a change in circumstances (fewer work hours, change in family composition, loss of employment, other extraordinary family situations) that would result in a lower parent share of cost, then we will document the change in circumstances and make the necessary reduction.

1. As an extension of the above question, our current process of determining eligibility for customers who are placed on a waitlist to receive care at some later point if funds are available does not seem in keeping with the guidance presented by the State: “Once a family is determined eligible, the children shall be considered to be eligible and shall receive services for 12 months”. There is other language that states each child “will receive such assistance for not fewer than 12 months before the State or designated local entity re-determines the eligibility of the child.” So if we keep our current process, when care is authorized for a customer coming off the waitlist, wouldn’t we have to extend the eligibility period by the amount of time needed for each child to actually receive assistance for 12 months?

**Current guidance indicates the 12 months begins at the “Eligibility Start Date” in TWIST. That “Eligibility Start Date” is the date you authorize care or the child begins care, whichever is later. Note: Our eligibility period will in effect be a 13-month eligibility period. For example: a customer with an “Eligibility Start Date” on January 9 will have eligibility until January 31 of the following year.**

**We review a customer’s income for eligibility and parent share of cost purposes at initial eligibility and at redetermination.**

**Bringing customers off the wait - we redetermine these customers’ eligibility as we bring them off the wait list. We will create a new program detail and fill in the Eligibility Start Date.**

1. Student holidays or breaks are considered temporary changes but so are cessations of work/training activities for less than three months. Can the Board extend the three-month definition to include additional days if there are any between the spring and fall semesters? Or just clearly state that summer breaks are included as temporary changes? Example: Spring classes end May 13 and fall classes start August 29. That’s more than three months. If so can we spell this out for customers in whatever guidance we give them as simply as possible – something like. “Summer breaks are considered a temporary change and you are not required to report a cessation in training activities as long as you resume training for the fall semester.”

Yes, the three-month period applies to permanent interruptions. The example provided where there is a break between Spring and Fall classes that is more than 3 months is a temporary interruption. The three-month period refers to a permanent change in work or education/training. This means the customer lost her job or the customer dropped out of school and does not plan to return. When that permanent change occurs, the customer has three months to become employed or to start an education/training program.

Q. If a customer loses job and decides during the 3 months to go to school, but school doesn’t start until 4th month, does this apply.

The three-month period is a minimum. If the customer informs us that she will begin a new job or an education/training program within a few weeks, then we can extend the transition period. In these circumstances, there must be a definitive start date for the employment or the education/training program and we must know this information by the end of the three-month period.

1. If a temporary interruption happens 2 months before the recertification date, but they will be out for 4 months, what do we do at redetermination?

Example-1/1/16-1/31/17 interruption 11/12/16-1/31/17, but because of medical they need to be out until 2/15/17.

If the customer is in a period of interruption at redetermination, then stop care. The customer will have to re-apply. Note: this is not the same for a customer who chooses to suspend care.

Q. Please explain the difference and what happens?

An example:

* Customer A lost her job at the end of October and her eligibility ends December 31. The interruption period extends through January 31. If she does not begin employment or an education/training program by December 31 at redetermination (see #19 above), customer A is not eligible and you stop care.
* Customer B is in an education/training program and suspends care during the Christmas/Winter break. Her eligibility ends December 31. During redetermination, we consider she is still attending her education/training program. If she meets all other eligibility requirements, we can determine her eligible for an additional 12 months.

1. What do we do if the customer shows up on an exception report as over the 85% SMI? If the customer is determined over the SMI from the exception report, do they go into recoupment from the time the change occurred?

We investigate to determine why the customer income is over 85% SMI. Remember we can make adjustments for temporary or one time increases in income. We will only recoup for fraud. We are not changing our current process.

Q. If after investigation we determine the increase in family income is a permanent change, do we send the 15 day letter and stop care? Is there then further fraud investigation since they did not report the permanent change?

Yes to both questions.

1. Do we give 15 days to everyone before ending care? Fraud, over 85% SMI, etc.

Yes. The customer has the right to appeal a decision regarding fraud or a determination the family income is over 85% SMI.

1. If someone calls, and has a reduction in work hours during the 12 months do, we automatically review for fee reduction or does the customer have to actually request it?

If the customer calls and reports information that may reduce the parent share of cost, we must evaluate the information and reduce the parent share of cost as appropriate. The customer does not have to request the reduction.

Q. (A)Will we do a manual change in TWIST for all changes to PSofC? (B) What about a change in income during the 12-month eligiblity period which does not put them over 85%? Does the income change go in TWIST Counselor Notes only or somewhere else in the Program Detail?

(A) Yes, you will have to make a manual change in the “Authorized” row in the Program Detail tab – Share of Cost.

(B) If the customer reports a change in income that does not put them over the 85% SMI, record the information in Counselor Notes and record what actions you are taking because of the change in income.

1. What happens when the customer moves into another WDA in the state? There are restrictions in TWIST on the WDAs so, do we close the referral and program detail?

According to the child care rule, the customer’s 12-month eligibility continues. We (the appropriate tracking unit or the Call Center) will work with the other board area to ensure the transition – closing the referral and program detail on our end and opening a program detail and referral by the new board.

1. Rental Income-applicant has a roommate they pay her $250.00 monthly is this considered rental income?

No. The roommate is sharing the rent.

1. Are we checking tax wages on every customer applying for childcare? If we see discrepancies are we speaking to the customer about the situation and documenting our findings?

It is a good practice to review a customer’s tax wages. Certainly, you would want to discuss inconsistencies with the customer. Always document your eligibility determination findings.

1. A car salesman or realtor is employed by a company, but are strictly commission. In the last 3 months there has been no income, how do we proceed? Technical they are still employed they just haven’t sold anything.

Is the customer required to work a minimum number of hours? Consider that this is self-employment.

1. If someone is determined homeless as of now we are adding them to the waitlist. At the time funds become available will they need to provide updated information on homelessness to start the 3 months?

We redetermine eligibility status when we bring the customer off the wait list.

1. If someone is placed on the waitlist after 10/1/16, and then they receive a letter that there are available funds. Are we going to re-determine eligibility? They would have been placed on the list based on the new rules.

Customers determined eligible on or after October 1, 2016 – eligibility is determined using the new rule. The customer is eligible for 13 months (see question # 17).

For customers on the wait list, we will need to recertify eligibility according to new child care rules.

1. How do we average work or education/training hours to demonstrate and average of 25 (2-parent 50) hours per week?

We do not have an answer. We will develop and provide guidance.

1. Will the call center continue approving or denying cases upon receipt?

Yes.

1. Exception Reports:

We will provide more information regarding Exception reports later.

1. When the 15-day letter is sent is that it or does the customer have the option to submit their paperwork before the end of the 15 days?

The customer has the opportunity to submit their paperwork before the end of the 15 days or during an appeal process depending on approval from the Appeal Officer. This applies at initial eligibility and at redetermination.

1. If a customer has a permanent job loss, we start the 3 months. They come back and say they will be starting school with their schedule/transcript, but school starts after the 3 months do we end care or extend the interruption? Same with I lost a job do a permanent loss, I get a new job in the 3 months, but start after the 3 months. (before the redetermination period)

See Question #18 above.

1. What happens if the redetermination date happens prior to the 3 months. I’m in an interruption that will end on my redetermination date because it was sooner than the 3 months. I am scheduled to start work or school right after my redetermination date, I have a school schedule/transcript or something from the employer.

See Question #19 above. At redetermination, the customer must be qualified to receive financial aid for child care. There is no option to base eligibility on something that may happen in the future.

1. Are children with disabilities and teen parents still considered priorities?

(a) Financial Aid for child care services are prioritized among the following three priority groups:

(1) The first priority group is assured child care services and includes children of parents eligible for the following:

(A) Choices child care;

(B) Temporary Assistance for Needy Families (TANF) Applicant child care;

(C) SNAP E&T child care; and

(D) Transitional child care.

(2) The second priority group is served subject to the availability of funds and includes, in the order of priority:

(A) Children who need to receive protective services child care;

(B) Children of a qualified veteran or qualified spouse;

(C) Children of a foster youth;

(D) Children experiencing homelessness;

(E) Children of parents on military deployment whose parents are unable to enroll in military-funded child care assistance programs;

(F) Children of teen parents; and

(G) Children with disabilities.

(3) The third priority group includes any other priority adopted by the Board.

**Choices Childcare**

1. Did we decide on when to start the 3 months for Choices cases penalized? When you send NCL or when the penalty is entered?

When we enter the penalty, we use the Non-Compliance Letter date as the noncooperation date for the penalty. We will use the noncooperation date as the interruption start date. We will revise the Non-Compliance Letter to include information about the interruption period.

* 1. Will the NCL include instructions as to who to contact if they resume participation, regardless of whether they are still receiving TANF or still participating with an office and will this always be the office/PSR?

Yes. If customer resumes participation, continue to work with the office/Tracking Unit. If the customer does not resume participation nor obtains employment or enrolls in education/training, then Tracking Unit sends out the 15 day notice to customer and vendor. See #5 below. Note: resumes participation means the customer is meeting participation requirements.

* 1. If no longer in TANF/Choices services but customer resumes some type of participation, would the PSR enter an authorization request to resume childcare in case notes much like they would currently for those who are actually have open services?

See #5 below. We are planning that the Call Center assume responsibility for the customer record if the customer does not continue as a Choices customer but becomes employed or enrolled in education/training.

Q. If the customer is working and continues to receive TANF and agrees to turn in check stubs every pay check do we continue to track them as Choices or remove them from Choices and have the Call Center track.

In this example, the customer is resuming participation in Choices (see a. above)

1. Are there any documentation requirements for a customer who reports that they have resumed participation in an activity during the 3 months of inactivity? Case notes? Proof of employment/training? Does it differ if the customer is still eligible for TANF/Choices versus not?

We would use our normal verification of participation process (if the customer is still eligible for TANF Choices), a completed Employer Verification of Employment form for work or documentation of enrollment in education/training from the education/training institution.

1. If a customer doesn’t return from the 3 months and care is ended, does a new 12-month eligibility period start when and if they do return later?

Yes. If the customer does not continue participation in Choices or resume work or education/training in the three months, then you discontinue care and close the program detail. You would begin a new 12-month eligibility period if, after closing the program detail, the customer meets initial eligibility requirements (participating in Choices or SNAP E&T, working or attending education/training for the required number of hours).

1. When do we notify daycare of 3-month end date? At 15-day letter time is suggested, mail 15-day letter and call daycare at the same time.

We think this is the correct approach to notify the customer and the vendor at the same time.

1. Who will mail the 15 day letters? Call Center or Tracker? Tracker runs all childcare report and sends to call center for 15 day letters there shouldn’t be a difference between funding streams. All who need a 15-day letter should be sent on one roster at one time. Note-Care for choices will still be ended by the Trackers and mail the 2450 to the daycare.

The Tracking Unit will send the 15 day letter unless there has been a handoff to the Call Center. A handoff of the customer record will occur if the customer does not resume TANF Choices participation and instead obtains employment or begins education/training.

1. When the 15-day letter is sent is that it or does the customer have the option to submit their paperwork before the end of the 15 days?

The customer has the opportunity to submit their paperwork before the end of the 15 days or during an appeal process.

1. At the point of ineligibility in Choices for employment who tracks care? Who will mail redetermination letter? Trackers or Call Center?

We do not understand the question. Does the answer to number 5 above help?

1. TANF Applicants are reviewed weekly for participation if they stop participating when does their 3 months start? Do we do an interruptions or leave them under TANF APP care based on the app being active for 60 days?

We can provide child care to a TANF Applicant who (a) is employed or (b) chooses early engagement in Choices. A TANF Applicant who chooses early engagement is considered participating in Choices. We will provide additional guidance regarding TANF Applicants later this month.

1. Under intake common in Twist, we specify whether the customer is either a TANF applicant or receiving Choices. Since there will only be one program detail open for the 12-month period. Which option do we choose now?

Use the appropriate reason for care as of the application date

1. Will the board pay the parent fee to the daycare if the parent fails to pay his or her share?

No

**DFPS**

1. Will we allow all DFPS customers transition over to CCSF or will we only transition over Former DFPS?

When DFPS General Protective Child Care ends and DFPS does not authorize any other DFPS-funded care (e.g. foster, relative care), the child will enter Former DFPS and receive care for the remainder of the 12-month eligibility period.

1. How will our board area track funding streams to determine when a customer will receive their 12 months of Former Care?

The 12-month eligibility period begins when DFPS authorizes DFPS funded care. Former DFPS is required after DFPS stops the authorization for DFPS funded care and lasts until the end of the 12-month eligibility period.

1. How will our board area track children receiving care based on the different caregivers to determine when a child should receive 12 months of Former Care

Since we do not yet know all the changes that will occur in TWIST next week, assume you will create a new program detail during the period DFPS is not funding care and track as former DFPS. You will have to manually set the referral periods to ensure the twelve months of care.

1. Will this change impact existing customers as of 10/01/16 or future customers only, with regard to Former DFPS?

If DFPS customer becomes “former DFPS on or after October 1, 2016, the customer is assured care for the full 12-month eligibility period.

1. When will we discuss with CPS and what part will they play in implanting these changes. What will affect their caseworkers and coordinators.

We will arrange a meeting with board staff, the Call Center staff and DFPS staff to ensure a coordinated process is in place the week of 9/26/2016.

1. Customer is in Former DFPS on 10/1/2016 that is scheduled to end at the end of October. Customer started Former DFPS on 8/1/2016 and was requested for 3 months. Do we continue the Former DFPS funded care for the full 12-month period or redetermine eligibility for at-risk care?

Continue the Former DFPS funded care for the full 12-month period that began when DFPS funded care began.

**Parent Share of Cost**

1. Will PSOC reductions currently in place remain in place until redetermination?

Yes, these reductions will remain in effect for families currently in care.

1. Do all customers with child support currently counted as income need to be contacted for a fee reduction on 10/1?

If a customer requests an adjustment to Parent Share of Cost because some income no longer is included then we will re-determine income and apply an adjustment to the Parent Share of Cost in TWIST using the “Authorized” Parent Share of Cost fields in TWIST.

1. Will there be a discount we can apply to Parent Share of Cost?

Yes, we will continue to use the discount for families with 6 or more family members. We will continue to make this adjustment in the “Authorized” fields in TWIST.