EEC Subsidy Management Policy Training

February 2019
Welcome

The Massachusetts Department of Early Education and Care (EEC) is hosting mandatory Subsidy Management Training for all Subsidy Administrators (contract providers and CCRRs) for the 2019 Financial Assistance Policy Guide that will be effective March 1, 2019. The agenda for today’s training is as follows:

- Definitions
- General Requirements for Child Care Subsidies
- Parent Fee Changes
- Reauthorization
- CCFA
- Attendance
- Forms
- Audit Compliance & Resolution
- Question & Answer Session
Welcome

EEC Staff in attendance:

- Carole Meehan, Director of Caseload and Financial Assistance
  - EEC Financial Assistance Unit
    - David T. Bessette, Financial Assistance Specialist
    - Tara O’Brien McNally, Financial Assistance Policy Analyst
    - Carmen M. Quiñones, Financial Assistance Specialist
    - Brenda Santiago, Financial Assistance Specialist

- Alicia Wells, Associate Commissioner for Audits and Teacher Qualifications
  - EEC Audit Compliance and Resolution Unit
    - Frank Ray, Subsidy Fiscal Monitor
    - Joyce Wilkins Nkwah, Grant and Subsidy Fiscal Monitor

- Miranda Roberson, CCFA Trainer
EEC will publish a new Financial Assistance Policy Guide which will be available on the EEC website on March 1, 2019: https://www.mass.gov/guides/child-care-subsidy-management-and-ccfa

You were sent a draft copy of this guide to assist with today’s training but you must refer only to the final version once issued.

This new guide replaces the Interim Financial Assistance Policy Guide and must be the only guide referenced by Subsidy Administrators effective March 1, 2019.

All Subsidy Administrators must review the new guide in full prior to completing any eligibility authorizations.

Chapters referenced in this training refer to the new chapter numbers in the Financial Assistance Policy Guide.

Questions about specific changes should be sent to the EEC Financial Assistance Unit at EECSubsidyManagement@mass.gov
The Financial Assistance Policy Guide will be effective for all authorizations or reauthorizations initiated on or after March 1, 2019 and is effective until a new policy guide is issued. This means that any appointments scheduled on or after March 1, 2019 will be subject to this guide. Any appointments scheduled prior to March 1, 2019 will be subject to the old rules.

*Examples:*

- Parent has a reauthorization appointment on February 25, 2019 for a reauthorization start date of March 5, 2019: Interim Financial Assistance Policy Guide applies (Modified October 26, 2018)

- Parent has a reauthorization appointment on March 1, 2019: 2019 Financial Assistance Policy Guide applies
The EEC Financial Assistance Procedures Manual is a new document that EEC is creating to provide Subsidy Administrators with a how-to guide on how to complete eligibility determinations, what actions are needed in KinderWait or CCFA, what documents are needed in your files, etc.

Chapters have been set up to mirror the Financial Assistance Policy Guide chapters but not all topics in the Policy Guide are addressed in the Procedures Manual.

Some text that used to be in the Financial Assistance Policy Guide has been moved to the Financial Assistance Procedures Manual so that the Policy Guide could focus more on policy and not the details of how to do actions.

The Procedures Manual is a work in progress given time constraints but EEC intends to add additional information in the coming months.

We have left in place headers for items that we already plan to add to the manual but we are also open to suggestions on topics you wish to see or items that need more clarification. We will also use questions asked during these trainings to inform future additions to the Procedures Manual.
Definitions

Policy Guide Chapter 1
New Definitions added

- Abandonment of Subsidy. A Family’s failure to have an active child care placement for more than 30 consecutive Days during the 12 month Authorization period, unless the Family has requested an Approved Break-in-Care.

- Caregiver. A person who lives with, supervises and cares for a Child or Children whose Parents do not live in the home, such as a foster Parent, legal guardian (temporary or permanent).

- Dependent Relative. A Relative of the Child receiving care who resides in the household with the Child and is financially dependent on the Child's Parent(s), as certified through the Parent(s)’s most recent tax returns.

- Parent. A biological or adoptive Parent or step-parent who resides in the household with his or her Dependent Child(ren), or a Caregiver.

- Seasonal Employment. Employment whose regular work season totals no less than 8 months of the year. See Policy Guide Chapter 3.7.1 and Procedures Manual Chapter 3.3.1 for examples of qualified industries.
General Requirements for Child Care Subsidies

Policy Guide Chapter 3
All documentation must be received in full prior to the issuing of an authorization. Parents MAY NOT be granted short term authorizations in order to complete documentation.

The earliest a Subsidy can start would be the following business day.
Policy Guide Chapter 3.3
Family Composition and Relationship Requirements

Proof of Residency for Second Parent

- EEC has updated the 2019 EEC Financial Assistance Policy Guide to include additional proof of residency documentation that will be acceptable to show the address of a second parent.

- This list should be used when requesting documentation to prove a second parent is not living in the home (such as after the birth of a new child) or to remove a second parent from a household.

- Any other document provided by the Parent but not included on this list may be sent to EEC (via email to eecsubsidymanagement@mass.gov) on a case by case basis for review and approval.

- **ALL documentation from foreign countries MUST be sent to EEC for approval, even if it appears to meet the criteria of one of the items on the list.**

- EEC will review other public databases prior to the approval of documentation not on the list and prior to approval of documentation from foreign countries.
Proof of Residency for Primary Parent

- EEC has updated the 2019 EEC Financial Assistance Policy Guide to include additional proof of residency documentation that will be acceptable at Authorization/Reauthorization for a primary Parent to show residency in Massachusetts.

- Any other document provided by the Parent but not included on this list may be sent to EEC (via email to eecsubsidymanagement@mass.gov) on a case by case basis for review and approval.

- EEC will review other public databases prior to the approval of documentation not on the listed in the policy guide.
Authorization Lengths – 12 weeks vs 12 Months

• **12-Month Authorizations:**
  – If a Parent provides all documentation required to confirm a valid service need, the Parent shall be issued a 12-month Authorization.
  – This includes approved education programs that are shorter than a year.
  – The following authorizations are always 12 months:
    • Income Eligible with proof of a valid service need;
    • DTA-Related Child Care where parent is in an ESP Activity
    • DCF-Related Child Care;
    • Homeless Child Care (unless family doesn’t have full documentation)
  – 12 months starts from the first day of care, not the day you authorize the family or receive the referral.

• **12-week Provisional Authorizations:**
  – A Provisional Authorization of 12 weeks is to seek and certify an approved activity for families that cannot provide all service need documentation:
  – The following authorizations are 12 weeks:
    • Parent(s) on maternity/paternity leave at Authorization/Reauthorization
    • Parent(s) enrolled in a non-approved training program
    • Newly employed Parent(s) unable to certify employment in full
    • Parent seeking to qualify with a service need of Incapacity of Parent.
    • DTA-Related Child Care who is in a planning period
    • Homeless Family who needs time to submit income documentation

• **When issuing an authorization to a family, your only options are 12 weeks or 12 months.**
Reporting of Temporary and Non-Temporary Changes

Policy Guide Chapter 3.7
Procedures Manual Chapter 3.3
REPORTING OF CHANGES

All Parents are responsible for reporting changes that might affect their eligibility. Subsidy Administrators must notify Parents of the requirement to report changes and that failure to report Non-Temporary Changes may result in an Intentional Program Violation (IPV).

ALL CHANGES MUST BE REPORTED WITHIN 30 DAYS OF THE CHANGE

- **Temporary changes** are defined as changes to a Parent’s circumstances, including:
  - Any time-limited absence from a Parent’s approved activity due to an illness or need to care for a family member;
  - Any interruption in work for a seasonal worker who is not working between regular industry work seasons;
  - Any semester or holiday breaks for a Parent participating in education or training (*does not have to be reported*);
  - Any reduction in work, training or education hours, as long as the Parent is still working or attending training or education;
  - Any other cessation of a Parent’s approved activity that does not exceed 12 weeks; and
  - Any change in residency within the Commonwealth.

- **Non-temporary changes** are defined as changes to a Parent’s circumstances, including:
  - Increases in total gross household income exceeding 85% SMI;
  - Changes in family contact information;
  - Changes in household composition for more than 30 total days in a 12 month Authorization;
  - Changes in Child custody arrangements;
  - Any out of state change in address; or
  - Any change or cessation of a Parent’s work, training, or education participation that lasts more than 12 weeks.
General Guidance for Temporary and Non-Temporary Changes

- To qualify for a Temporary or Non-Temporary change, a Parent must have an active 12 month Authorization.

- Parents must report changes at all times, but Temporary and Non-Temporary changes in CCFA may not be made during 12 week Provisional Authorizations.

- Subsidy Administrators cannot require Parents to report any Temporary or Non-Temporary Changes in person. Subsidy Administrators must make all forms of reporting available (fax, email, mail) to Parents.

- Start date for all Temporary or Non-Temporary Changes:
  - All Temporary and Non-Temporary Changes must start at least the day after a Parent reports the change and completes all documentation, unless otherwise noted in the Procedures Manual.
  - For example: if a Parent reports a change on Monday, the change takes effect no earlier than Tuesday. Non-Temporary Changes cannot start the same day as a master Authorization.

- When a Parent reports a change, it is up to the Subsidy Administrator to confirm that the Parent is in a 12 month Authorization and then to determine if the change is a Temporary or Non-Temporary change.

- Procedures Manual Chapter 3.3 has guidance on how to tell the difference, what documentation is needed for each change, and what action Subsidy Administrators need to follow.

- Temporary and Non-Temporary Changes shall not be made unless all documentation required has been received by the Subsidy Administrator.
Temporary Changes

The following situations shall be considered Temporary Changes:

1. Parent’s time limited absence from an approved activity due to an illness or need to care for a Family member
   - The absence may be from any approved activity, including education/training.
   - There is no limit to how long a Parent may be out, however, Parent must be able to document an approved activity by the next Reauthorization.
   - Situations that fall into this category include Maternity/Paternity Leave; FMLA related break; short-term or long-term disability; workers’ compensation; etc.
   - This Temporary Change replaces the need to use Special Need of Parent during a 12-month Authorization
   - Parent’s level of subsidized child care will not be affected and the Parent Fee may be adjusted as detailed in Policy Guide Chapter 11.

2. Any interruption in work for a seasonal worker who is not working between regular industry work seasons:
   - Policy Guide Chapter 3.7 and Procedures Manual Chapter 3.3.1 detail what can qualify as seasonal employment.
   - In general, the Parent’s work must last at least 8 months of the year to qualify as Seasonal.
   - Parent must be able to document an approved activity by the next Reauthorization, so interruption in work cannot cross over Authorizations.
The following situations shall be considered Temporary Changes:

3. Any semester or holiday break for a Parent participating in education or training
   - This definition now includes all semester and holiday breaks, including the full summer break and the time limit is no longer limited to only breaks of 6 weeks or less.
   - Semester Breaks DO NOT need to be reported by a Parent (the one exception to reporting of changes) if a Parent is enrolled in the following semester/term.
   - If the Parent is not enrolled in the following semester/term, then it would be considered a Non-Temporary Change and failure to report could lead to an IPV.

4. Any reduction in work, training, or education hours, as long as the Parent is still working or attending training/education:
   - As long as the Parent is still working or in training/education for at least one hour per week, the reduction in work, training, or education hours qualifies as a Temporary change.
   - Parent must be able to document an approved activity of at least 20 hours or at least 30 hours for full time care, by the next Reauthorization.
Temporary Changes

The following situations shall be considered Temporary Changes:

5. Any other cessation of a Parent’s approved activity that does not exceed 12 weeks
   - If parent has a new service need at the time of reporting and it has been less than 12 weeks since the end of the last service need, the Subsidy Administrator shall deem the change a Temporary Change and record the new service need in CCFA.
   - If parent has left work, education, or training program and does not have a new service need at the time of reporting, the Subsidy Administrator shall deem the change a Non-Temporary Change.

6. Any change of residency within the Commonwealth:
   - Parent must report change in contact information as detailed under Non-Temporary Change, but if the Parent moves to another residence within Massachusetts, subsidized child care can remain in place.
   - Subsidy Administrator must assist the Parent if the Parent is moving to a new area and the Child(ren) cannot remain in the same placement.
Non-Temporary Changes

1. Increases in total household income exceeding 85% SMI:
   - Major change in the new Policy Guide is that when a Parent reports an income over 85% SMI, the Parent shall not be terminated but shall be advised that if the income remains above 85% SMI at the subsequent Reauthorization, the Parent will not be eligible for Reauthorization.

2. Changes in family contact information:
   - When a Parent reports a change in contact information, the Subsidy Administrator must update the household record in CCFA immediately. Address changes in CCFA should include the correct effective date.

3. Changes in household composition for more than 30 total days in a 12 month Authorization:
   - Reminder that time limit is 30 total days, not consecutive days.
   - Please see Procedures Manual Chapter 3.3.3(C) and Policy Guide Chapter 3.7.2(C) for detailed information.
   - Subsidy Administrator must not remove someone from a household until the documentation required has been provided.

4. Changes in Child custody arrangements:
   - Please see Procedures Manual Chapter 3.3.3(D) and Policy Guide Chapter 3.7.2(D) for detailed information on each kind of scenario.

5. Any out of state change in address:
   - When a Parent reports that they have moved out of the Commonwealth of Massachusetts, a two week notice (including a Request for Review form) shall be given immediately.
6. Any change or cessation of a Parent’s work, training, or education participation that has been deemed a Non-Temporary Change:
   - The Parent shall be listed as having a 12 week seeking approved activity period. The seeking approved activity period shall take effect the day after the Parent reports the change.
   - The Seeking Approved Activity Period is limited to 12 weeks or the end of the Parent’s 12-month Authorization, whichever is sooner.
   - Subsidy Administrator shall issue a Notice of Termination at the time the Seeking Approved Activity Period is issued. The effective date (i.e. last day of care) on the Notice is the last date of the 12 week Seeking Approved Activity Period.
   - At the end of the Seeking Approved Activity Period, one of the following shall occur:
     • If Parent presents full documentation of a service need: the 12-month Authorization will continue until the original end date at the same level of care previously authorized, even if the Parent is not working 20 or 30 hours.
     • If the Parent presents preliminary documentation of a service need: the Parent may receive an 8 week extension. Subsidy Administrator shall issue a second Notice of Termination with an effective date of the last date of the extension.
     • If the Parent does not present full documentation, or preliminary documentation, of a service need at the end of the Seeking Approved Activity period, or at the end of any extension, care shall end with the termination effective date that was issued at the start of the Seeking Approved Activity or extension period.
   - Parents may have more than one seeking approved activity period during the 12 month authorization, however multiple periods shall not be consecutive.
   - All Seeking Approved Activity Periods must be entered as a sub-authorization, not as a new master Authorization.
Chapter 3.8 Voluntary Changes

- Parents may report changes that benefit the household, such as an increase in the level of care or a reduction in the Parent Fee.

- If a Parent is authorized for Part Time Child Care, reports a change in service need that would allow Full Time Child Care, and wishes to change to Full Time Care:
  - The Parent must present documentation showing a Full Time Service Need as well as all other documents required for Reauthorization as detailed in Policy Guide Chapter 5.
  - Once all required documentation has been received, the Subsidy Administrator will complete a full Reauthorization of the household and issue a new 12 month Authorization.
  - Parent Fee is established as a part of the Reauthorization process.

- If Parent reports, and provides documentation of, a change in income that will reduce the Parent Fee, fee adjustments shall be made in accordance with Policy Guide Chapter 11.5.
Income Eligible Requirements

Policy Guide Chapter 4
Chapter 4.2 Financial Eligibility

- **Effective March 1, 2019, new income thresholds will be as follows:**
  - Families must have incomes at or below 50% SMI to enter the Income Eligible System and may remain up to 85% SMI.
  - Families with a Child or Parent with a documented special need may enter care with incomes at or below 85% SMI but can now only remain in care up to 85% SMI. There is no longer a 100% SMI limit for families with special needs.

- Families with Special Needs/Disabilities who were Reauthorized for care prior to March 1, 2019 but whose income exceeds 85% of the SMI, as allowable under prior regulations, may continue in care until the end of the Family's current Authorization. Such Families may not be Reauthorized again unless the total gross household income is at or below 85% of the SMI.

- Families who are transitioning to Income Eligible from another program (such as DCF or DTA) are considered to be Reauthorizations and may have incomes at or below 85% SMI at the time of their Income Eligible Authorization.
Chapter 4.3: Service Need Changes

EEC has made some changes to allowable service needs:

- **Approved Education/Training programs are now limited to the following:**
  - Full-time high school program;
  - An accredited college or university, leading to an Associate’s or a Bachelor’s degree (No graduate, medical, or law school).
  - A high school equivalency program (GED or HISet), vocational training program, or an ESOL program that is included on the Executive Office of Labor and Workforce Development’s (EOLWD) MassHire Eligible Training Provider List (ETPL) (currently found at [http://jobquest.detma.org/JobQuest/Training.aspx](http://jobquest.detma.org/JobQuest/Training.aspx)).

- **Accelerated Semester Coursework:** EEC has added a new way to calculate college coursework that is on an accelerated schedule, similar to how EEC previously allowed for the calculation of summer courses. Please take note of this in the Policy Guide, particularly around the rules for online courses.

- **Incapacity of Parent:** all uses of this service need must now be approved in writing by EEC prior to the issuance of an Authorization/Reauthorization.
  - Policy Guide Chapter 4.3 details what Subsidy Administrators should do in these circumstances and the timelines for Parents to submit documentation to EEC.
Chapter 4.3: Service Need Combinations

- **SERVICE NEED COMBINATIONS – ALLOWED:** Work and approved education or training may be combined to meet service need requirements.

- **SERVICE NEED COMBINATIONS – NOT ALLOWED.**
  - Incapacity of Parent may not be combined with any other approved activity to establish a service need.
  - A Parent may not claim seeking approved activity, if he/she has established a Part Time Service Need of employment, education, or training. Parent must be authorized for Part Time Child Care.
  - At Initial Authorization Only, if a Parent has documented proof of a Part Time Service Need and can provide preliminary proof (i.e. EVF, signed employer letter, preliminary school enrollment) of a Full Time Service Need, the Parent(s) may be granted a 12 week Provisional Authorization to certify a Full Time Service Need.
    - If the Parent(s) can provide full documentation of a Full Time Service Need at the end of the 12 week Provisional Authorization, a 12 month Authorization of Full Time Child Care will be granted.
    - If the Parent(s) can only provide full documentation of a Part Time Service Need at the end of the 12 week Provisional Authorization, a 12 month Authorization for Part Time Child Care will be granted.

- **If a Parent has not established a valid service need of at least 20 hours, a Seeking Approved Activity may be combined with another approved activity to establish a service need.**
  - Subsidy Administrator shall enter the hours in a service need and income and enter remaining hours as Seeking Approved Activity (i.e. Parent is working 10 hours; CCFA entry is 10 hours of employment and 20 hours of Seeking Approved Activity).
Chapter 4.3: Travel Time

EEC has made some changes to Travel Time being added to a Parent’s service need:

- **Use Of Travel Time To Increase Service Need:**
  - Before travel time may be added to an Parent’s service need, the Parent must establish a minimum of at least 20 hours in an EEC approved activity.
  - If eligible, up to 5 hours of travel time per week may be added to a Parent’s service need provided that the travel is **related** to the necessary time to/from the child care program and the Parent’s service need activity.
  - Travel Time **may not** be added to a job search.

- **Restrictions On The Use Of Travel Time:** If Children are transported to/from the early education and care program by someone other than the Parent, including the program, travel time is not allowed.

- **Documentation Required and Amount of Travel Time Allowed:**
  - Subsidy Administrator must use Google Maps to confirm the time required for the Parent(s) to travel from the child care program to the Parent(s) service need activity location and back to the child care program, based on the Parent(s) mode of transportation.
  - The amount of travel time added to the Authorization cannot be greater than the documented amount of time it takes to complete the roundtrip travel (i.e. if round trip travel totals 2 hours a week, only 2 hours of travel time shall be added to the Authorization).
  - Printout from Google Maps showing required travel time **must** be kept on file.
  - In a two Parent household, travel time must be calculated based on which Parent is transporting the Child(ren). If the Parents alternate days, or alternate drop-off and pick-up, the travel time calculation must take that into account.
Reauthorization

Policy Guide Chapter 5
All documentation **must** be received in full prior to the Reauthorization of a family. Parents **MAY NOT** be granted short term Authorizations in order to complete documentation. The earliest Subsidy can start would be the following business day.

Two week notice for partial documentation is prohibited.
Reauthorization Period

- **Parent(s) who lost their service need within 30 days of Reauthorization** may be granted a 12 week Provisional Authorization. All restrictions, extensions, and requirements detailed in Chapter 4 apply.
  - If a Parent changed service need **within 30 days** of Reauthorization and cannot provide full documentation of the new service need, the Parent may be granted a 12 week Provisional Authorization.
  - If a Parent(s) lost their service need **more than 30 days** prior to the end of the current Authorization date, the Parent may only have the balance of the current Authorization to present full documentation of a new service need. If the Parent cannot provide full documentation of a new service need, then care will end and the Authorization will expire. No extensions will be granted. If the Parent(s) provides full documentation within 30 days of the last day of care, Parent may be Reauthorized and the subsidy may resume.

- **Parent(s) who are on Maternity/Paternity leave at the time of Reauthorization** may be granted a 12 week Provisional Authorization. All restrictions, extensions, and requirements detailed in Policy Guide Chapter 4.3 apply.

- **If Parent(s) do not complete Reauthorization prior to the last date of subsidy**, then care will end and the Authorization will expire. No extensions will be granted. If the Parent(s) provides full documentation within 30 days of the last day of care, Parent may be Reauthorized and the subsidy may resume.
Priority Populations

Policy Guide Chapters 6, 7, & 8
Chapter 7: DCF-Related Child Care

- EEC has worked with DCF and added processes in the Procedures Manual to address the most common questions we receive for DCF-Related Child care.

- **General Guidelines:**
  - Referrals issued by DCF will be valid for 45 Days from the date of issue. Parents must complete the process with the Subsidy Administrator to issue a DCF-Related Child Care Authorization prior to the end of the 45 Day period. Prior to denying a Parent who has an expired Referral, the Subsidy Administrator shall make every effort to contact the DCF Office to confirm if the Parent remains eligible for the Referral.
  - First day of a child’s 12 month Authorization is the first day of care, not the day that DCF referrals the child to your program.
  - **Children should not be enrolled before the DCF-Related Child Care Authorization is issued.**

- **Reporting Of Temporary And Non-Temporary Changes:**
  - DCF shall notify the Subsidy Administrator of applicable Temporary and Non-Temporary Changes detailed in Policy Guide Chapter 3.7, particularly changes in Child custody arrangements and changes in Parent contact information.

- **When a child’s DCF case has closed, DCF is no longer in communication with the Family. Therefore, all communication when a Child is authorized under DCF-Related Transitional Child Care, including the reporting of Temporary and Non-Temporary Changes, is the responsibility of the Parent.**
Chapter 8: Young Parent Child Care Services Program Requirements

- EEC has updated the terminology to **Young Parent**, however the provisions of this section remain applicable to the Teen Parent Contract.

- **Age requirements:**
  - Young Parents must begin in the program prior to their 20th birthday.
  - Young Parents are eligible to participate in the Young Parent Child Care Services Program until they reach their 24th birthday.
  - Enrolled Young Parent(s) who turn 24 during their 12 month Authorization may continue through the end date of their Authorization.

- **Service Need Requirements:**
  - Unless authorized by DTA or DCF, Young Parent(s) must participate in a full-time high school or high school equivalency (GED) program, or must have received a GED or high school diploma and be participating in an approved higher education, training, and/or work activity.
  - If existing Young Parents are either (1) a full-time high school or (2) participating in a high school equivalency program, any break in service need during the summer months would be considered a Temporary Change under Policy Guide Chapter 3.7.
  - If the Young Parent(s) already has a high school diploma or GED, the Young Parent(s) would need to comply with the regular income eligible service need requirements at the end of the current Authorization.
Chapter 9: Child Care for Homeless Families

- **Certification of Homelessness:** EEC has expanded the ways a Family may be certified as homeless to include the following:
  - A homeless Referral from DHCD that the Family is residing in a DHCD shelter, residing in temporary housing at a motel/hotel, or participating in a DHCD funded homeless stabilization or diversion program;
  - A homeless Referral from the Department of Children and Families (DCF) that the Family is residing in a DCF funded shelter;
  - A referral letter from a shelter provider/program, other than those that fall into the two shelter categories above.
  - Certification by the Child’s public school district or by a CCRR that the Family meets the following criteria to be considered homeless under Subtitle VII-B of the McKinney-Vento Homeless Assistance Act.

- **Homelessness Service Need:** Families certified as homeless may qualify for a Child Care Subsidy using a service need of homelessness
  - This service need can be used in any program that requires one (Income Eligible, DTA-T, etc.)
  - A homeless service need does not guarantee immediate access to a Child Care Subsidy, unless the Family meets the requirements for entry into a Homeless Child Care Contract or unless EEC releases targeted funding.
  - This service need carries a two year limit. Parents authorized with a service need of homelessness prior to March 1, 2019 will begin the count towards the 2 year limit at the Parent’s next Authorization.

- **Homeless Child Care Contract slots can only be used for Homeless Families who are receiving services through a DHCD or DCF shelter.**
Attendance
Policy Guide Chapter 10
Chapter 10.2: Unexplained Absences

- **What is an Unexplained Absence:** when a Child does not attend on a scheduled day without any contact from the Parent.
  - If you are able to communicate with a Parent on a day the Child does not attend, even if the communication is initiated by you, the Absence may be considered Explained.
  - If you attempt outreach to a Parent but receive no response, then the Absence shall be considered Unexplained.
  - If you have communication with the Parent during a series of Unexplained Absences and the Parent explains why the Child has been Absent on prior Days, the day on which the Parent makes contact may be marked as an Explained Absence. However, all prior Day(s) must remain marked as Unexplained Absence(s).

- **Excessive Unexplained Absence** is defined as more than 3 consecutive Unexplained Absences. Holidays, closure days, or any day the program is not open in the middle of consecutive Unexplained Absences will not reset the count.

- **What to do when a Child has Excessive Unexplained Absences:**
  - Upon the first occurrence of Excessive Unexplained Absences during a 12 month Authorization (or 12 week Provisional), you must issue the Family an Excessive Unexplained Absence Warning Notice form.
  - Upon the second occurrence of Excessive Unexplained Absences during a 12 month Authorization (or 12 week Provisional), you may issue a Notice of Termination for the Child.
    - If you choose to not terminate for Excessive Unexplained Absences, EEC will not pay for any additional occurrences of Excessive Unexplained Absences for the Child (EEC will pay for three consecutive unexplained, but not the fourth or more days).
    - Parents may not be charged for Excessive Unexplained Absences that are not paid by EEC unless the Parent has already exceeded 45 unattended days and meets the requirements of Policy Guide Chapter 10.3.3.

- Number of occurrences of Excessive Unexplained Absences will reset each time a new 12 month Authorization is issued to the family.
Chapter 10.3: Explained Absences

- Explained Absences occur when a Child does not attend and the Parent has been in communication you. There is no longer a specific list for explained absences and reasons include, but not limited to:
  - Child Illness
  - Death in the Family
  - Emergency Circumstances
  - Religious Holidays
  - Vacation
  - Other reasons as explained by the Parent

- Excessive Absences occur when a Child has had more than 45 non-attended days, including any Unexplained Absences, within a 12 month Authorization period, or more than 15 non-attended days during an initial 12 week Provisional Authorization period.
  - Children may receive waivers to the Absence limit in accordance with Policy Guide Chapter 10.5.1.
  - Children enrolled through DCF-Related and DTA-Related Child Care may be exempt from the excessive absence limit as detailed in Policy Guide Chapter 10.4.

- Absence counts remain with a Child during the course of a 12 month Authorization or 12 week Provisional Authorization, even if the Child changes Child Care Educator/Provider.

- Absence counts will reset each time a new 12 month Authorization is issued to the Family in accordance with EEC’s Authorization and Reauthorization policies.
Chapter 10.3.2: Notifications for Absences

- Subsidy Administrators or Child Care Educators/Providers must notify Parent(s) who are approaching the Excessive Absence limit.

- Notifications must be issued to the Parent promptly after a Child has reached Absence day 30 and day Absence 40 using the Excessive Absence Warning Notice. The purpose of the notification is to remind the Parent(s) that they will be financially responsible for all unattended days over the 45 day limit. During a Provisional Authorization, Parent(s) must be notified when their Child’s Absence count reaches Absence day 10.

- After a Child has reached the 45th Absence, or 15 Absences during an initial 12 week Provisional Authorization period, the Parent(s) must be notified using the Excessive Absence Notification Form and must return a signed form acknowledging that the Parent is willing to remain in care beyond 45 days and will pay for all additional Absences. *Failure to sign the form does not excuse a Parent from paying for additional Absences since the Parent will have signed the Attendance Notification Agreement at the last Authorization/Reauthorization.*

- Subsidy Administrators or Child Care Educators/Providers may use CCFA to track Absences if attendance is entered in the system timely, but CCFA will not generate notifications automatically and some Absence counts in the system do not update until ledgers are generated at billing. **The Subsidy Administrator or Child Care Educator/Provider must maintain a system for tracking Absences outside of CCFA so that Parent(s) are notified promptly after 30, 40, and 45 Absences.**
Chapter 10.3.3: Payment for Excessive Absences

- Unless Child is exempted under Policy Guide Chapter 10.4 or receives a waiver under Policy Guide Chapter 10.5.1, EEC will not pay for additional Absences once a Child has reached the Excessive Absence limit. EEC will continue to pay for all attended days and all paid closure days.

- The Parent shall be responsible for payment of Absences exceeding 45 Days at the daily reimbursement rate paid by the Commonwealth:
  - This payment shall include any transportation rate normally paid by EEC.
  - This payment shall NOT include any daily add-on rate, QRIS bonus, or FCC System Admin fee.
  - This payment is in addition to the Parent(s)’ normal Parent Fee established under Policy Guide Chapter 11.

  - Example: If the total amount paid to the provider for the Child is $50 and the Parent’s normal Parent Fee is $10, EEC pays $40 for the Child. The amount billed to the Parent for an Excessive Absence Day would be a total of $50 – the normal Parent Fee plus EEC’s portion.
  - Child Care Educator/Provider shall not charge the Parent the rate charged to published private pay Families unless the published private rate is lower than the EEC daily rate.

    - Example 1: Published private rate is $75 and the EEC daily rate is $59.24. The Parent is required to pay $59.24 for any Absence days over 45.
    - Example 2: Published private rate is $55 and the EEC daily rate is $59.24. The Parent is required to pay $55 for any Absence days over 45.

- Excessive Absence Billing Options for Child Care Educators/Providers:
  - If a Child Care Educator/Provider chooses to not charge a Parent for excessive absence days, the Child Care Educator/Provider does so with the recognition that they may not seek payment from EEC for the Excessive Absence Days and they shall not seek payment for that day by the Parent in the future.
  - Child Care Educator/Provider must make note of the decision to waive payment for the Excessive Absence Days in the Parent(s)’ file.
  - A Child Care Educator/Provider choosing to not charge a Parent for particular Excessive Absence Days does not prohibit the Child Care Educator/Provider from seeking payment for future Excessive Absence Days. Detailed notes must be kept in the Parent(s)’ file.
Chapter 10.4.1: DCF-Related Child Care

- **Process for Unexplained Absences:**
  - Children in DCF-Related Child Care are NOT automatically exempt from the Unexplained absence limit.
  - You must send the Excessive Absence Warning and any Notice of Termination to the DCF Social Worker, Supervisor, and Child Care Coordinator via email.
  - If DCF wishes DCF-Related Child Care to continue beyond the termination date, DCF must email the Subsidy Administrator Reauthorizing the Child. A new Referral form is not needed, only the email confirmation. Once received, the Child will resume under the prior Authorization. A new 12 month Authorization should not be issued.
  - If the Child is enrolled through DCF-Transitional Child Care, DCF is unable to provide approval to continue care after unexplained absences since they are no longer in communication with the family. Therefore, the termination proceeds.

- **Process for Explained Absences:**
  - You must keep DCF informed of excessive absences, and any other attendance issues, for Children receiving DCF-Related Child Care.
  - Notifications issued to the Parent under Policy Guide Chapter 10.3.2 shall also be sent to the DCF Social Worker, Supervisor, and Child Care Coordinator via email.
  - Upon a Child reaching the excessive absence limit, the Subsidy Administrator should seek email confirmation from DCF that Child care is appropriate to continue. This email confirmation shall be considered to be the Reauthorization by DCF required under 606 CMR 10.03(1)(i)(2).
  - DCF does not need to be kept informed and does not need to email confirmation of continued care for Children receiving DCF Transitional Child Care. All other EEC attendance policies apply to Children authorized for DCF-Related Child Care, including the requirement that Children will not be Authorized for early education and care on days they are regularly scheduled to be absent, unless exempted under Policy Guide Chapter 10.5.2.

- **All other EEC attendance policies apply to Children Authorized for DCF-Related Child Care, including the requirement that Children will not be Authorized for early education and care on days they are regularly scheduled to be absent, unless exempted under Policy Guide Chapter 10.5.2.**
Chapter 10.4.2: DTA-Related Child Care

• Families with active TAFDC Referrals for DTA-Related Child Care under Policy Guide Chapter 6 shall be exempt from the 45 Day Absence total through the end of their Authorization period.
  – This exemption does not apply to Parent(s) authorized for DTA-Transitional Child Care or DTA-Post-Transitional Child Care.

• Children in DTA-Related Child Care are NOT exempt from the Unexplained Absence limit described in Policy Guide Chapter 10.2. Subsidy Administrators shall follow the process detailed in Policy Guide Chapter 10.2 for situations of Excessive Unexplained Absences for DTA-Related Child Care.

• The Child Care Educator/Provider or Subsidy Administrator shall make every effort to discuss excessive absences with the Parent and remind the Parent that the Absence exemption will no longer exist once the Child’s DTA-Related Authorization ends.

• All other EEC attendance policies apply to Children authorized for DTA-Related Child Care, including the requirement that Children will not be Authorized for early education and care on days they are regularly scheduled to be absent.
Chapter 10.5: Attendance Waivers

• Medical Waivers (Chapter 10.5.1):
  – Children who have a medical condition, temporary or permanent, may apply for a waiver to the excessive absence limit.
  – Waivers must be approved no less than on an annual basis, corresponding with a Parent(s) Authorization/Reauthorization and will follow the Child during the Authorization, even if the Child changes programs.
  – Waivers may be used for chronic conditions or for a condition that is short term in nature.
  – Waivers may be used in lieu of an Approved Break in Care for medical conditions lasting 3 weeks (15 billable days) or less.
  – Waivers must be approved by two staff members at a Subsidy Administrator, with one staff member at a supervisory level.
  – Waivers will only exist during the period of time specified by the medical professional.
  – Waiver applications must be on the Excessive Absence Medical Waiver form and include a letter from a medical professional.

• Schedule Waivers (Chapter 10.5.2):
  – EEC is creating a process for limited waivers to the regulation that Children will not be Authorized for early education and care on days they are regularly scheduled to be absent (i.e., every Friday, homework clubs, etc.).
  – Waivers to schedule are limited to Children enrolled through DCF-Related Child Care, including DCF-Related Transitional Child Care. Children in other programs may be considered for the waiver in extenuating circumstances.
  – Waivers are only limited to a maximum of 2 days per week, cannot be backdated, and must be approved in writing by EEC.
  – Exemptions in other programs, such as for speech therapy or mental health appointments must be addressed through the Medical Waiver under section 9.5.1.
Attendance: What happens March 1st?

- In order to allow the Absence count for all Children from prior to March 1st to not count towards the 45 day limit without removing attendance records, EEC has created a solution for CCFA.

- This solution is not as simple as “setting everyone to 0”, so the following will occur:
  - All Authorizations and placements in CCFA will be split in two with one ending on 2/28/19 and a new Authorization/placement starting on 3/1/19.
  - DCF and DTA (active TAFDC only) Authorizations will not be split.
  - This will look similar to the process EEC undertook when collection of DTA-Transitional and DTA Post-Transitional Parent Fees were halted.
  - If you are entering a new Authorization in the coming weeks that start before 3/1/19, you can assist this process by creating two Authorizations yourself with identical information.
  - A side benefit is that if you need to enter a Temporary or Non-Temporary Change for someone Authorized prior to 10/1/18, you no longer need to split the Authorization yourself.

- EEC will be bringing down CCFA on 2/28/19 to complete this process. We advise that you do not meet with subsidy clients on that day.

- All Parents must sign the new Attendance Notification Agreement.
Parent Fees
Policy Guide Chapter 11
Parent Fee Changes

• Changes to Parent Fees (Increase or Reductions)
  – Changes in Parent Fees take effect the business day following the day all documentation is received, even if it is an increase in the fee.
  – Changes in Parent Fees are not permitted during a 12 week Provisional Authorization.

• Reduction in Income:
  – When a Parent reports a reduction in income, the Parent may request a reevaluation of their Parent Fee, but must present documentation and the Subsidy Administrator must enter the Parent’s revised income into CCFA and the system will recalculate the new Parent Fee.
  – Documentation required:
    • Completed Household Income statement;
    • If income is employment related, last four paystubs showing reduced income.
    • If reduction is due to Maternity/Paternity leave, letter from the employer outlining income to be received during the Parent’s leave.
    • If reduction in income is due to a different Temporary Change, documentation from the employer outlining income to be received during the Parent’s leave.
    • If income is child support or other unearned income source, Parent must provide the same documentation required in Policy Guide Chapter 4.1.

• Increases in Income: Parent fee changes after an increase in income only occur when a Parent previously had the fee lowered. The income must be entered into CCFA and the system will calculate the fee.
Collection of Parent Fees and Provider Responsibilities:

- Educators/Providers are responsible for collecting Parent Fees in a timely fashion, and must take appropriate action if Parents fail to pay fees as required.
- **Educators/Providers who allow Parents to accrue balances in excess of the value of three weeks’ Parent Fee may be responsible for the balance.**
- Child Care Educators/Providers who enter into a Repayment Agreement with the Parent following the guidelines in Policy Guide Chapter 11.6.3 may maintain a balance in excess of the value of three weeks’ Parent Fees, subject to the limitations detailed in Policy Guide Chapter 11.6.3.
- Three week balance limit is related to the value of outstanding Parent Fees only, not other fees such as fees for excessive absences, late pick-up, etc.

Provider Actions for Late Payment or Non-Payment of Fees:

- Upon the first non-payment of fees, Child Care Educator/Provider or Subsidy Administrator should issue the Parent a Non-Payment of Parent Fees Warning Notice.
- If Parent pays balance after receipt of the Non-Payment of Parent Fees Warning Notice (prior to next Parent Fee due date) no further action is needed.
- If Parent fails to respond to the Non-Payment of Parent Fees Warning Notice, including paying balance prior to next Parent Fee Due date and maintaining subsequent week’s fees, Child Care Educator/Provider or Subsidy Administrator may issue a Notice of Termination.
- **Termination notices should not be issued if you are allowing the Parent to have a repayment agreement.**
**Parent Fee Changes**

**Resolution of Parent Fee Balances:**
- If the Parent resolves the outstanding Parent Fee balance prior to the end date of the termination notice, the original end date of the Authorization shall be restored.
- If the Parent resolves the outstanding Parent Fee balance within 30 days of the last day of care, the Parent may resume the subsidy.
- **Even if the Parent resolves the fee balance, the termination shall still count as an IPV and as one instance on Non-Payment for the purpose of applying Sanctions under Policy Guide Chapter 15.**

**Repayment Agreements:**
- Child Care Educators/Providers may offer repayment agreements to Parents. A written policy must be in place for the issuance of repayment agreements that follows all of the guidelines in Policy Guide Chapter 11.6.4, including:
  - All Repayment Agreements must be in writing, signed by both parties, and include all the information required under Chapter 11.6.4.
  - Value of repayment agreements should not exceed 3 weeks’ worth of Parent Fees and, if they do, it is at the Child Care Educator/Provider’s own risk.
  - The repayment agreement shall take the place of a Non-Payment of Parent Fees Warning Notice.
  - If a Parent fails to maintain a repayment agreement, the Child Care Educator/Provider must follow EEC regulations and polices and shall not give a Parent an immediate termination.
  - If a Parent leaves the program with an outstanding repayment agreement, the Child Care Educator/Provider can seek three weeks’ worth of back owed Parent Fees plus the value of any repayment agreement.
- Child Care Educators/Providers are not required to offer repayment agreements but when plans are offered, the agreement must follow the Child Care Educators/Providers written policy.
Child Care Financial Assistance System (CCFA)
Master and Sub Authorization

- Master authorization captures Type, FT/PT, start and end dates, base co-pay.
  - This information informs all sub-authorizations added under the master.

- Sub Authorization captures eligibility detail.
  - Temporary and Non-Temporary Changes reported by the Family are entered into CCFA from the sub-authorization.

- Reauthorizations are only done at the end of a master authorization.
  - The “Add Authorization” action item creates another master and sub-authorization.

- Temporary and Non-temporary Changes are only done on sub-authorizations under a 12-month master.

- Actions
  - Terminating a placement never brings in the end date of the master authorization.
  - Changing the Authorization end date on the sub-authorization will bring in the end date of the master if there is only one sub-authorization under that master.
Forthcoming Changes – March 1

- Users will be able to select between “temporary” and “non-temporary changes” on sub-authorizations.
- DTA Authorizations will have a “Non-Temporary Change” functionality.
- DTA-T and DHCD Referrals will have “Temporary” and “Non-Temporary” change functionality.
- CCRR users will be able to place DTA-T and DTA-PT sub-authorizations under the same master authorization.
- Master authorizations will have an action drop down menu with a “change end date” option.
• Adding income to Authorizations now captures frequency and individual paystub details
  – Ex. a weekly pay stub requires 4 entries and 4 document validations
  – CCFA will calculate the monthly amount for each stub entered and then average the monthly amounts to calculate the “average monthly amount” for that income entry.

• Forthcoming changes – March 1
  – Validations to enforce a frequency to stub entry match (ex. bi-monthly = 2 stub entries)
  – Entering “check date” and validations on the date entered
  – Income detail will appear on the Application and Fee Agreement
All documentation must be received in full prior to the Reauthorization of a Family. Parents MAY NOT be granted short term Authorizations in order to complete documentation. The earliest Subsidy can start would be the following business day.

Two week notice for partial documentation is prohibited.
New Financial Assistance Forms
Financial Assistance Forms

- EEC has replaced all forms for Subsidy Management and will post all forms on the EEC website on March 1, 2019: https://www.mass.gov/lists/forms-for-managing-financial-assistance

- These new forms replace all prior versions and should be the only forms used by Subsidy Administrators effective March 1, 2019.

- All Subsidy Administrators must review the new forms with the Parent in full prior to completing any eligibility authorizations.

- All Subsidy Administrators must destroy any blank forms that do not have “Effective Date March 1, 2019” on the bottom.

- Questions about specific forms should be sent to the EEC Financial Assistance Unit at EECSubsidyManagement@mass.gov
Audit Compliance and Resolution Updates
Audit Unit Reminders

- **Internal Control and Policy Updates**
  - Sound protocols that align with all EEC regulations and polices
  - Segregation of Duties

- **Income Calculations**
  - Financial Assistance Procedures Manual Chapter 4 details how to calculate earned and unearned income.
    - CCFA Income Module will calculate; must enter the correct amounts.
      - Refer to Chapter 4.2 Financial Eligibility for guidance on Relevant Income, Income Sources, and Excluded Income.

*Income Calculation examples:*
- Inconsistent Child Support-this is the process that should be used when Parent receives payments on an irregular basis.
- For Child Support through DOR, Parent(s) must submit the required documentation:
  - A print out from DOR system showing amount awarded; AND
  - A print out from the DOR’s system showing payments.
- Calculation of Child Support Payments:
  - Example 1: In February, Parent A received payments of $120 on 2/11/19; $75 on 2/25/19; and $60 on 2/27/19. Values are added together for a total of $255. $255 is divided by 4 to equal $63.75. $63.75 shall be entered into CCFA as a weekly amount.
  - Note: Calculated weekly amount should be entered in CCFA as weekly and CCFA will multiple by 4.33 to calculate the correct monthly amount.
Mitigate income miscalculation errors and/or recoupment:
- implement a review procedure (i.e., a two-person review process) for all files to ensure compliance with all of EEC’s regulations.
- Income Miscalculation of a Parent’s income, is considered a Provider Improper Payment and will need to be corrected.

There are two types of Income Miscalculation errors:
- When the Parent’s income is understated, Subsidy Administrators are responsible for the recoupment value for the entire Authorization as this error results in an overpayment. Reimbursement is due to EEC.
- When the Parent’s income is overstated, Subsidy Administrators are responsible for the recoupment value for the entire Authorization as this error results in an underpayment. Reimbursement is due to the Parent.

CCFA Adjustments
- IF the fix occurs within 14 calendar Days of the start of the Authorization, then the provider can “edit” the Authorization and make the appropriate changes to the income.
  - If the Parent Fee increases, then the Parent will begin to make payments 14 calendar Days after the fix.
  - If Parent fee Decreases, then Parent Fee assignment will take place immediately.
- IF the fix occurs outside the 14-day window, then the provider needs to void the placement(s), delete the Authorization, re-create the Authorization with the correct income, and submit a help desk ticket requesting an override of the Authorization.
  - If the Parent Fee increases, then the Parent will begin to make payments in the following service month after the fix.
  - If Parent Fee decreases, then Parent Fee assignment will take place immediately.
Best Practices

• Meeting with the parent
  – Ensure you ask all questions that pertain to the eligibility requirements.
  – Don’t wait for the Parent to relay information to you.

• Educating the parents
  – Review all the forms carefully with the Parent
  – Ensure the Parent understands the Subsidy eligibility requirements.

• Creating a file
  – Parent file structure; suggest a use of a trifold folder format.
  – Every file should have a checklist for the purposes of ensuring all required documentation is submitted. Additionally, the use of a checklist provides structure for secondary review.
  – Documents sent electronically must be legible. Picture copies should not be accepted. If Parents need to send documents electronically and do not have a scanner available, they should use a scanner function on their phone.
    • Example of scanner applications: CamScanner (Android); Scanner for Me (iPhone); PDF document scan (iPhone)
  – Wet vs Dry Signatures
    • EEC’s definition of a Wet Ink Signature is a signature created when a person physically signs a document. Signatures on documents via email or fax are considered Dry Signatures.
    • Documents at Authorization or Reauthorization:
      – It is EEC’s expectation that as many documents as possible will have a Wet Ink Signature, particularly if it is a document or form that the Parent completed during the Parent’s appointment. Documents or forms that do not have a Wet Ink Signature must have a Dry Signature.
      – The Subsidy Administrator must have a Wet Ink Signature on the Financial Assistance Agreement.

• Case Notes
  – Creation of a narrative that details interaction with a Parent. These interactions include in person or phone, Email communication between the Parent and the Child Care Provider/Educator should be included in the Parent file.
  – Information entered into CCFA Notes Section include but not limited to the following:
    • Parent Fee balance
    • Dual Household; document the other FID
Department of Transportation (DOT) has implemented changes to the 7D Licensing process as well as 7D vehicles.

**October 1, 2018**

*7D Training Changes*

- New applicants must successfully complete two hours of pre-service training before applying for a 7D certificate.

*7D Vehicle Changes*

- All tires must have a minimum tread depth of 4/32”.
- All vehicles need additional safety equipment:
  - Body fluid clean up kit
  - Seat belt cutter
  - Fire/evacuation blanket for wheelchair vehicles only
- Both sides of all 7D vehicles must have company name, city, and state visibly displayed.
Transportation~RMV Regulation Updates

**October 1, 2019**

*7D Training Changes*

- Eight hours of in-service training must be completed for all 7D renewal applicants.

*7D Vehicle Changes*

- All vehicles must have an interior school bus light indicator.
- All vehicles must have an audible backup alarm.

**October 1, 2020**

*7D Vehicle Changes*

- All vehicles must have a child reminder system.
- Size of vehicle can not exceed seating capacity for 10 passengers.
Question & Answer
All POLICY QUESTIONS, including questions on how to apply policy to a specific Family, should be sent to the Financial Assistance Unit at: EECSubsidyManagement@mass.gov.

– Questions will be responded to as quickly as possible. EEC requests that you send each question/issue only once and that you do not email or call individual members of the Financial Assistance Unit with the same question/issue.
– To help us respond faster, please use a Standard Subject Line when sending emails:
  • FID
  • Authorization end date
  • Subject matter/Chapter from 2019 Financial Assistance Policy Guide
– Please include as much detail as possible and attach any supporting documentation to avoid back and forth before we can provide an answer.

ALL CCFA ISSUES, including requests for assistance with entries and requests for overrides, must be submitted through the Help Desk: https://massgov.service-now.com/eec

– DO NOT SEND POLICY QUESTIONS TO THE HELP DESK.
– Help Desk tickets will be responded to as quickly as possible. EEC requests that you submit only one ticket per issue.

Always make sure to include the FID and Family Name when submitting questions and Help Desk tickets!
In Conclusion.....

We hope this session was helpful and met your needs.

A Training Evaluation survey will be sent via email.

Thank you for your continued service on behalf of families and children of the Commonwealth!!