

FRONT END DETECTION SYSTEM (FEDS) PLAN OF OPERATION

If an application has one or more of the indicators checked below on the district's approved FEDS plan, and the eligibility worker is not confident that an indicator has been explained or supported adequately, the application must be referred for a FEDS investigation. The wording of each indicator must appear exactly on the FEDS plan as well as the FEDS referral process/form.

Section 1 – State Mandated Indicators

All district plans must include these indicators:

- Financial obligations are current, but stated expenses exceed income *without a reasonable explanation***
- Working off the books (currently or previously)**
- Supported by loans or gifts from family/friends**
- Application is inconsistent with prior case information**
- Prior history of denial, case closing, or overpayment *resulting from an investigation.***

Section 2 – State-Approved Optional Indicators

This section may be left blank if a county chooses not to select any of these optional indicators for its FEDS process. If the district chooses to include any or all of these optional indicators in its plan, eligibility workers must also refer to FEDS any applications with these indicators:

- No absent parent information or information is inconsistent with application**
- No documentation to verify identity or documentation of identity is questionable**
- Landlord does not verify HH composition or provides information inconsistent with application [not used for MA]**
- Self-employed but *without adequate business records* to support financial assertions**
- Alien with questionable or no documentation to substantiate immigration status [used only for MA]**
- Documents or information provided are inconsistent with application, such as different name used for signature or invalid SSN [used only for MA]**
- P.O. Box is used as a mailing address *without a reasonable explanation*, e.g., high crime area**
- Primary tenant with no utility bills (e.g., phone or electric) in his/her name**
- Children under the age of six with no birth certificates available**
- Unsure of own address [not used for MA]**
- Income varies without reasonable business records to support financial assertions"(only used for Child Care**

Section 3 – State-Approved County-Specific Indicators

Eligibility workers are not allowed to refer cases based on an “other” box that they fill in for each FEDS referral. Indicators listed and checked here must be pre-approved by the State and must be pre-filled on the district’s FEDS referral process/form. This section may be left blank if a district chooses not to create any county-specific indicators for their FEDS process. Once the State approves this indicator, eligibility workers must also refer to FEDS any applications with these indicators:

() County-Specific Indicator: None

Section 4 – Description of FEDS Process - Please describe your FEDS process:

a. Specify what program areas will use FEDS:

TA FS Medicaid CC HEAP Other (specify)

b. Describe how an application will be referred by the eligibility worker to the investigative unit. Include if this is a manual, e-mail or automated process, and if there is eligibility supervisory review. OTDA strongly encourages eligibility supervisory review.

The FEDS referral check-off form is reviewed for every Family Assistance, Safety Net Assistance, Medicaid Assistance, Food Stamp Assistance and Day Care Subsidy Applications. The FEDS indicator review occurs during the initial screening of each applicant. If the initial screener indicates that one or more potential FEDS indicators are present, a referral for a FEDS review is mandatory.

The FEDS referral is attached to a copy of the application for services completed during the initial screening for applicants applying for assistance. The application and FEDS referral is sent by courier directly to the Head Examiner of the Special Investigation Unit (SIU) who logs in the referral and assigns the application for assessment and FEDS review. The Unit of origin maintains the original application and FEDS referral.

FEDS referrals will be made for Medical Assistance cases based upon the following indicators: Expenses exceed income, consumer working off the books (currently), self-employed without adequate business records to support financial assertions, an individual with no documentation to verify his/her identity or the identification is suspect and documents provided are inconsistent with applicant, such as different name used for signature or invalid SSN. No other indicators, including those mentioned on the first page of this FEDS Plan, will be used to conduct a FEDS on a Medical Assistance applicant. Each of these indicators have been approved by the New York State Department of Health, see attached. The MA examiner will complete the FEDS referral check-off form and forward the FEDS referral with the application to our SIU. Our SIU units are co-located to maximize communication between our investigative staff and eligibility workers. The Grade 13 supervisor in SIU reviews the referral and assigns the case to a special investigator.

FEDS referrals for Day Care Subsidy cases will be referred consistent with the indicators mentioned above, with one exception, SSN. Our Day Care Subsidy Unit will initiate a FEDS referral in a manner consistent with the process described above. The referral will be reviewed by the Supervisor of the Day Care Unit and subsequently submitted to SIU for a FEDS review.

- c. Describe how the investigative unit logs and tracks the referral, as well as how it processes it (i.e., home visit, collateral contact, office interview, etc.).

The Head Examiner (SIU Director) with clerical support will log the referral in the SIU Unit. The SIU Director is responsible for logging, assigning and tracking the referral. All investigations will begin within seventy-two hours of receipt of the referral.

FEDS investigations are the responsibility of the Special Investigations Unit under the supervision of the Special Investigators Supervisor and Head Social Welfare Examiner. Orange County is currently involved with the Family Assistance and Safety Net Assistance Case Management Project. This project conducts in home assessments for all FA and SNA applicants. Case managers from this project will refer consumer applying for assistance for a FEDS investigation when a home visit reveals the presence of a FEDS indicator. Prior to forwarding a referral for a FEDS, the case manager from each project must have the case reviewed with the social welfare examiner assigned to manage their work on behalf of the consumer.

Potential FA and SNA consumers are screened in our offices located throughout Orange County. This initial screening will include the completion and collection of the application for assistance. As consumers are screened, the eligibility worker will schedule the initial home visit to conduct the eligibility assessment. This home visit is provided by one of the case managers from the Family Assistance and Safety Net Assistance Case Management Project.

Our FEDS process will focus on insuring that the consumer lives where they have reported, that the individuals in the household are represented on the application and the needs as identified on the application are valid. Additionally, this process will also include an improved assessment of the consumers needs by deploying a college education level case manager to assess the needs of the family beyond the traditional boundaries of income maintenance.

- d. Specify the targeted time frames for reporting investigative results back to the eligibility worker for final determination.

The bottom of the FEDS referral form has a section for case disposition. The eligibility worker will complete this section and have the referral returned to the SIU Director for processing. The original FEDS referral will be maintained by the SIU while a copy of the referral will be maintained in the consumer's case record. The results of each FEDS are reported back to the eligibility worker within 15 days of the receipt. This will allow time for information to be clarified if required by the eligibility worker.

Additionally, since the case managers who conduct the assessment and FEDS process will remain involved with the family or individual until the

case is opened and assigned for undercare examiner services. Information regarding the disposition of the application process will be available through the social welfare examiner assigned to the case.

- e. If your district contracts out for investigations, such as with a local sheriff's department, explain this process and staffing and identify the contractor.

This District does not currently contract out for investigations; however, we are currently operating an advanced case management program for TANF applicants. This service provides in-home assessments, diversion, substance abuse, mental health and other forms of human service interventions. Our case management teams work together with out eligibility staff and SIU investigators to insure compliance with our FEDS process is maintained. On occasion, a contracted case manager during a meeting with the eligibility worker assigned to a case will request a FEDS based upon one of the approved indicators. On these occasions, this Department requires the eligibility worker to review and approve the FEDS referral prior to transmission to SIU. This process applies only to FA and SNA Public Assistance cases. For all other programs, MA, FS, HEAP and childcare, the eligibility worker sends the FEDS referrals directly to our SIU Unit. All investigations will begin within seventy-two hours of receipt of the referral. The FEDS process for these programs will focus on insuring that the consumer lives where reported, that the individuals in the household and their income are represented on the application, and the needs as identified on the application are valid by using collateral contacts as well as home visits where necessary.

- f. Describe how and when the investigative unit is informed of the final action taken on the application, for inclusion in the FEDS monthly report.

The SIU Director with clerical support will be responsible for insuring that the FEDS report is submitted within the timeframes established by OTDA, DOH, OCFS and OCDSS. The contracted case manager or special investigator will insure that any information required will be provided directly to the SIU Director by the last day of the month. The information will be compiled and reported to the OTDA Program Integrity Unit by the 10th day of the following month.

Monthly reports regarding the results of our local FEDS process will be developed through a process of insuring that Family Assistance, Safety Net Assistance, Medicaid and Family Health Plus referrals can be clearly identified. These results are typically compared and used to measure the success and/or failure of our local FEDS process. All information collected, measured and used to make future determinations regarding the use of FEDS will be reported by SIU to the appropriate departments within OTDA and DOH.

- g. Attach copies of:
- Any letter used to inform an applicant of a FEDS interview or home visit (attached)
 - Any letter used to inform an applicant that they may be investigated for FEDS (none)
 - The FEDS referral form (attached)

- Any other FEDS form that passes between eligibility and investigations, such as a report of investigation. (none)

This Plan was completed by (please print): Janette Hendrick

Title: Head Social Welfare Examiner, SIU

Email Address: JHendrick@co.orange.ny.us Phone: 845-291-4374

ORANGE COUNTY
FRONT END DETECTION REFERRAL

SECTION I

Check appropriate programs: **CHILD CARE ONLY** () Date of Referral: _____

Applicant Name: _____ Date of Birth _____ Date of Application _____

Address: _____ Case # _____

Applicant's SSN: _____ Sex: _____ Language _____

Reason for Referral: *(Copy of application is required and any other pertinent info.- cert comments;118; etc.)*

- () PRIOR HISTORY OF DENIAL, CASE CLOSING OR OVERPAYMENTS RESULTING FROM AN INVESTIGATION
- () NO DOCUMENTATION TO VERIFY IDENTITY OR DOCUMENTATION IS QUESTIONABLE
- () APPLICATION IS INCONSISTENT WITH PRIOR CASE
- () NO ABSENT PARENT INFORMATION OR INFORMATION IS INCONSISTENT WITH APPLICATION
- () UNSURE OF OWN ADDRESS
- () SELF-EMPLOYED BUT *WITHOUT ADEQUATE RECORDS* TO SUPPORT FINANCIAL ASSERTIONS
- () WORKING OFF BOOKS *(Currently or Previously)*
- () INCOME VARIES WITHOUT REASONABLE BUSINESS RECORDS TO SUPPORT FINANCIAL ASSERTIONS

HAS ANY ASSISTANCE (OTHER THAN EXPEDITED FS) BEEN ISSUED? _____

Comments: _____

Eligibility Worker _____ Date _____

SECTION II

SIU Findings: _____

Investigator _____ Date _____

STATISTICAL INFORMATION

SECTION III

Case Disposition

- () APP-APPROVED
- () APP-DENIED-FEDS-RELATED
- () APP-DENIED-NON-FEDS-RELATED
- () APP-WITHDRAW-FEDS-RELATED
- () APP-WITHDRAWN-NON-FEDS RELATED
- () GRANT REDUCTION-FEDS RELATED
- () GRANT

Return to SIU as soon as eligibility determination is made by worker, but notify SIU if status changes. FEDS-RELATED

Eligibility Worker _____ Date _____ SIU Supervisor _____ Date _____

**APPENDIX G-1
CHILD CARE SECTION
DATED 2007-2009**

County: Orange

Code: 33

I. Administration (Required Section)

Describe how your district is organized to administer the child care program including any functions that are subcontracted to an outside agency.

1. Identify the unit that has primary responsibility for the administration of child care for:

Public Assistance Families: **Child Care Subsidy Unit**

Transitioning Families: **Child Care Subsidy Unit**

Income Eligible Families: **Child Care Subsidy Unit**

Title XX: **Protective/Preventive Units in Children's Services**

2. Indicate the use of New York State Child Care Block Grant (NYSCCBG) Funds.

Total NYSCCBG Amount: \$7,854,195

A. Subsidy	\$6,476,720
B. Other program costs (excluding subsidy)	\$420,711
C. Administrative costs	\$956,764

3. Does your district have a contract or formal agreement with another organization to perform any of the following functions?

<u>Function:</u>	<u>Organization:</u>	<u>Amount of Contract:</u>
<input type="checkbox"/> Eligibility screening		
X Screening of legally-exempt providers	Child Care Council of Orange County	\$108,711
X Assistance in locating care	Child Care Council of Orange County	\$168,800
X Child Care Information Systems	ControlTec (Kinder Track, Kinder Attend)	\$13,200
X Other	Transportation	\$130,000

APPENDIX G-2

II. Other Eligible Families if Funds are Available (Required Section)

Listed below are optional categories of eligible families that your district can include as part of its ICP. Select any categories your district wants to serve and describe any limitations associated with the category.

Optional Categories	Option	Limitations
1. Public Assistance (PA) families participating in an approved activity in addition to their required work activity.	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	
2. PA families or families with income up to 200% of the State Income Standard when the caretaker is:		
a) participating in an approved substance abuse treatment program	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	TANF only – On monthly basis, the parent must provide a written document confirming attendance in an approved substance abuse treatment program.
b) homeless	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	
c) a victim of domestic violence	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	
d) in an emergency situation of short duration	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	
3. Families with an open child protective services case when child care is needed to protect the child.	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	
4. Families with income up to 200% of the State Income Standard when child care services are needed because the child's caretaker:		
a) is physically or mentally incapacitated	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	
b) has family duties away from home	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	

5. Families with income up to 200% of the State Income Standard when child care services are needed for the child's caretaker to actively seek employment for a period up to 6 months.	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	
6. PA families where a sanctioned parent is participating in unsubsidized employment, earning wages at a level equal to or greater than the minimum amount under law.	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	
7. Families with income up to 200% of the State Income Standard when child care services are needed for the child's caretaker to participate in:		
a) a public or private educational facility providing a standard high school curriculum offered by or approved by the local school district	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	Will pay for high school diploma
b) an education program that prepares an individual to obtain a NYS High School equivalency diploma	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	GED
c) a program providing basic remedial education in the areas of reading, writing, mathematics, and oral communications for individuals functioning below the ninth month of the eighth grade level	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	
d) a program providing literacy training designed to help individuals improve their ability to read and write;	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	
e) English as a second language (ESL) instructional program designed to develop skills in listening, speaking, reading and writing the English language for individuals whose primary language is other than English	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	
f) a two year full-time degree granting program at a community college, a two year college, or an undergraduate college with a specific vocational goal leading to an associate degree or certificate of completion	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	Will only pay for an AAS Degree

<p>g) a training program, which has a specific occupational goal and is conducted by an institution licensed or approved by the State Education Department other than a college or university</p>	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	<p>Limited to 6 weeks</p>
<p>h) a prevocational skill training program such as, a basic education and literacy training program</p>	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	<p>Limited to 6 weeks</p>
<p>i) a demonstration project designed for vocational training or other project approved by the Department of Labor.</p> <p>The parent/caretaker must complete the selected programs listed under number seven within 30 consecutive calendar months. The parent/caretaker cannot enroll in more than one program.</p>	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	<p>Vocational training and/or undergraduate degree programs must present a clear means towards employment upon completion.</p>
<p>8. PA recipients and low income families with incomes up to 200% of the State Income Standard who are satisfactorily participating in a two-year program other than one with a specific vocational sequence (leading to an associates degree or certificate of completion and that is reasonably expected to lead to an improvement in the parent/caretaker's earning capacity) as long as the parent(s) or caretaker is also working at least 17 ½ hours per week. The parent/caretaker must demonstrate his or her ability to successfully complete the course of study.</p>	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	
<p>9. PA recipients and low income families with incomes up to 200% of the State Income Standard who are satisfactorily participating in a four-year college or university program (leading to a bachelor degree and that is reasonably expected to lead to an improvement in the parent/caretaker's earning capacity) as long as the parent(s) or caretaker is also working at least 17 ½ hours per week. The parent/caretaker must demonstrate his or her ability to successfully complete the course of study.</p>	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	

APPENDIX G-3

III. Reasonable Distance, Very Low Income, Definition of Engaged In Work For Child Care In Lieu of Temporary Assistance, Family Share, Case Closings and Openings, and Fraud and Abuse Control Activities (Required Section)

Reasonable Distance

Your district is required to define reasonable distance based on community standards for determining accessible child care.

The following defines "reasonable distance":

The following defines "reasonable distance": A TANF recipient in our County would be expected to travel from home to work activity site with a stop at a day care provider along the way within a one hour commute. It takes approximately one hour to travel from one end of our County to another. Also, some of our training sites are located in the middle of the County, which is approximately a 45-minute commute.

Describe any steps/consultations made to arrive at your definition:

This definition was discussed and agreed upon by our Welfare reform Committee. This Committee consists of our Deputy Commissioner, Director of Temporary Assistance, Case Supervisor of Child Care Subsidy, Deputy Director of ETA, and the Welfare to Work Coordinator of ETA. The Committee meets on a weekly basis and has since the inception of Welfare reform.

Very Low Income

Very Low Income is defined by each district and is used in determining priorities for child care benefits.

Very Low Income is defined as **200%** of the State Income Standard.

Definition of Engaged In Work For Child Care In Lieu of Temporary Assistance

The minimum number of hours for Federal Fiscal Year 2006 are:

- **20 hours for a single parent with a child under the age of six years old**
- 30 hours for a single parent whose children are six years of age and older
- in two parent families the parents must be working a combined total of 55 hours with at least one parent working 30 or more hours.

If a district proposes a higher minimum number of required hours of work describe the requirement below.

- hours for a single parent with a child under the age of six years old
- hours for a single parent whose children are six years of age and older
- in two parent families the parents must be working a combined total of 55hours with at least one parent working or more hours.

Family Share

Family share is the weekly amount paid towards the costs of the child care services by the child’s parent or caretaker. In establishing family share, your district must select a percentage from 10% to 35% to use in calculating the family share. The family share of child care is calculated by applying the family share percentage against the amount of the family’s annual gross income that is in excess of the State Income Standard divided by 52.

Family Share Percentage selected by our district **35%**.

Case Closings (select one or two)

1. The district must describe below how priority is given to federally mandated priorities and describe local priorities. If all NYSCCBG funds are committed, the district will discontinue funding to those families that have lower priorities in order to serve families with higher priorities. Described below is how the district will select cases to be closed in the event that there are insufficient or no funds available.

Cases will be closed from highest to lowest income. Families that have children with special needs will be closed last.

2. The district has not established priorities beyond the federally-mandated priorities. If all NYSCCBG funds are committed, case closings for families which are not eligible under a child care guarantee and are not a federally-mandated priority must be based on the length of time in receipt of services. The length of time used to close cases may be based either on the shortest or longest time receiving child care services but must be consistent for all families. The district has chosen to close cases based on:

- shortest time receiving child care services
- longest time receiving child care services

Case Openings

The district must describe below how priority is given to federally mandated priorities and how the district will select cases to be opened in the event that there are insufficient funds available.

Applicants will be placed on a waiting list.

Cases on the waiting list and new applicants will be opened in the following order:

- **Families that have children who have special needs**
- **Families whose income falls within 100%-150% of the State Income Standard (SIS)**
- **Families whose income falls with 151%-200% of the SIS**

Within categories listed above those families with the lowest income and that have been on the waiting list the longest will be opened first.

Fraud and Abuse Control Activities

The district must identify below the criteria it will use to determine which child care subsidy applications suggest a higher than acceptable risk for fraudulent or erroneous child care subsidy payment and procedures for referring such applications to the district's front end detection system.

See Attached Feds Plan

The district must describe below its sampling methodology used to determine which cases it will seek verification of an applicant or recipient's continued need for child care including, as applicable, verification of participation in employment, education or other required activities.

Orange County verifies the continued need for child care by conducting re-certifications every six months of 100% of service cases. The unit requests pay stub info and submission of employer worksheets.

The district must describe below its sampling methodology used to determine which child care providers of subsidized child care services they will review for the purpose of comparing the child care providers attendance forms for children receiving subsidized child care services and any child and adult care food program inspection forms to verify that child care was actually provided on the days listed on the attendance forms.

Based on the number of providers in CACFP (Oct 06), Orange County has a total of 62 cases to include in our reviewing process. The 62 cases are comprised of 17 family day care (FDCH); 42 group family day care (GRDC); two Legally exempt day care (LE) and one Military. Our number does not include any day care centers (DCC).

Orange County will compare the caregiver's attendance forms with any child and adult care food program inspection forms to verify that child care was actually provided on the days listed. Based on our universe size of 62, we will use a sample size of 52. Therefore, we will review five (5) cases per month.

Orange County has asked an employee of the Child Care Council to conduct a random sample of those providers in CACFP. The Child Care Council staff will cross reference the local district subsidy attendance sheets with the child and adult care food program inspection forms to determine if the children on the subsidy attendance forms were seen at the time of the CACFP inspection. Should there be any questionable information discovered, the Child Care Council representative would notify the worker in the Child Care Unit. If the worker believes that further investigation is warranted a referral would be made to our fraud unit.

APPENDIX G-4

IV. District Options (Required Section)

Districts have certain flexibility to administer the child care subsidy program to meet local needs. Check which options that your district wishes to include in your county plan. Complete attachments for any area(s) checked.

1. Our district has identified local priorities in addition to the federal priorities (complete Appendix G-5).
2. Our district has chosen to establish funding set-asides for NYSCCBG (complete Appendix G-6).
3. Our district is using Title XX funds for the provision of child care services (complete Appendix G-7).
4. Our district has chosen to establish additional local standards for child care providers (complete Appendix G-8).
5. Our district has chosen to make payments to child care providers for absences (complete Appendix G-9).
6. Our district has chosen to make payments to child care providers for program closures (complete Appendix G-10).
7. Our district has chosen to pay for transportation to and from a child care provider (complete Appendix G-11).
8. Our district has chosen to pay up to a 15% higher than the applicable market rates for regulated child care services that have been accredited by a nationally recognized child care organization (complete Appendix G-11).
9. Our district has chosen to pay up to 15% higher than the applicable market rates for non-traditional hours (complete Appendix G-11).
10. Our district has chosen to pay for child care services while a caretaker who works the second or third shift sleeps (complete Appendix G-11).
11. Our district has chosen to make payments to child care providers who provide child care services, which exceed 24 consecutive hours (complete Appendix G-12).
12. Our district has chosen to include 18, 19 or 20 year olds in the Child Care Services Unit (complete Appendix G-12).

APPENDIX G-4 (continued)

- 13. Our district is seeking a waiver from one or more regulatory provisions. Such waivers are limited to those regulatory standards that are not specifically included in law (complete Appendix G- 12).
- 14. Our district has chosen to pay for breaks in activity for low income families (non public assistance families, complete Appendix G-12).
- 15. Our district has chosen to use local equivalent forms such as, but not limited to, child care application, client notification and/or legally exempt enrollment forms (attach copies of the local equivalent forms your district uses).

Any previous approvals for local equivalent forms will not be carried forward into this county plan. Therefore, any local equivalent forms a district wishes to establish or renew must be included in this plan and will be subject to review and approval by OCFS.

**APPENDIX G-5
PRIORITY POPULATIONS-ADDITIONAL LOCAL PRIORITIES**

In addition to the federal priorities of very low income families and families with children who have special needs, the following additional local priorities have been selected:

Category: Rank:

Description:

Category: Rank:

Description:

Category: Rank:

Description:

Category: Rank:

Description:

Category: Rank:

Description:

**APPENDIX G-6
FUNDING SET-ASIDES**

Total NYSCCBG Block Grant Amount Including Local Funds	
Category:	\$
Category:	\$
Category:	\$
Category:	\$
Category:	\$
Category:	\$
Category:	\$
Total set asides	\$

Describe for each category the rationale behind specific set-aside amounts out of the NYSCCBG (e.g. estimated number of children, etc.).

Category:

Category:

Category:

Category:

Category:

APPENDIX G-6 (continued)

The following amounts are set aside for specific priorities out of the Title XX block grant:

Category:	\$
Category:	\$
Category:	\$
Total set asides (Title XX)	\$

Describe for each category the rationale behind specific set aside amounts out of the Title XX block grant (e.g. estimated number of children, etc.).

Category:

Category:

Category:

Category:

APPENDIX G-8
ADDITIONAL LOCAL STANDARDS FOR CHILD CARE PROVIDERS

The district may propose local standards in addition to the State standards for providers who will receive child care subsidies.

1. Described below are the additional local standards that will be required of providers as well as which providers must comply with each additional standard.

Providers of legally exempt child care and all household members 18 years of age and older will be asked to sign a release which will allow our Department to conduct a local child welfare database check.

The Enrollment Agency (EA) will notify our department when the legally exempt provider has been temporarily enrolled and whether or not the provider signed the release.

If a legally exempt provider or household member refuses to sign the release which would allow our Department to conduct a local child welfare database check, our Department will inform the parent/caretaker of the refusal so that they can consider the refusal when they make a decision to select the provider. In these situations, parents will be reminded of their right to choose another provider and will be given information about how to locate other providers.

When a local child welfare database check reveals that a legally exempt provider and/or household member(s) 18 years of age and older are the indicated subject of a child abuse or maltreatment report the provider will be required to submit to our Department a written statement providing information concerning the indicated report(s). This statement must be signed by the parent/caretaker acknowledging receipt of this information and confirming the parent/caretaker's wish to use this child care provider.

If the information regarding the indicated child protective report(s) does not correlate with the information obtained from the local data base check our Department will notify the provider that they have five calendar days to clarify the discrepancies in the information submitted to the Department and parent/caretaker. Within that five calendar day period the provider must submit information to our Department and the parent/caretaker that either correlates with the information obtained by our Department's local database check or the provider submits information to our Department which documents that the information obtained from the local database check is inaccurate. If the provider fails to clarify the discrepancies our Department will notify the EA that the additional local standard has not been met and no additional payments will be authorized.

If the information regarding the indicated child protective report correlates with the information obtained by the local child welfare database check, there are no other health or safety concerns, and the parent/caretaker still chooses to use the provider, the EA will be notified that the additional local standard has been met. In some cases, our district will need to inform the parent that the parent's decision to place their child in the care of this provider would place their child at risk. As mandated reporters, our Department is obligated to make a report of suspected child abuse or maltreatment if placing the child in the care of a provider would place the child in imminent danger of impairment and the parent/caretaker nevertheless places the child in that provider's care. Parents will be informed of their right to chose an alternative provider and be given information about how to locate other providers.

If a local child welfare database check reveals that the provider has an active or open preventive case the preventive caseworker will assess if the provision of child care by the provider/preventive services recipient would cause additional stress in the family thereby increasing the likelihood of the provider's own children going into foster care. If the preventive caseworker determines that providing child care services would cause additional stress on the provider/preventive services recipient thereby increasing the likelihood of the provider's own children going into foster care our Department will not notify the EA the additional local standard has not been met. Conversely, if the preventive caseworker determines that providing child care services would not cause additional stress on the provider/preventive services recipient our Department will notify the EA that the additional local standard has been met.

2. Described below are the methods and resources that will be utilized to determine that these additional local standards are being met.

Our district will provide the release, which will allow our Department to conduct a local welfare database check, in the enrollment package instructing the provider to return the completed enrollment package including the release to the enrollment agency. Providers and all household members 18 years of age and older will be informed that signing the release is voluntary and refusal to sign the release cannot be used as a factor in determining whether or not the provider can be enrolled.

When the enrollment agency receives the enrollment package and they have temporarily enrolled the provider they will notify the district whether or not the release was signed. If the release is signed our district will initiate the local child welfare check and will use procedures also outlined in number one.

If the local welfare database check reveals an indicated child protective report the Day Care Unit staff will follow the procedures outlined in number one.

3. Described below are the procedures the district will use to notify the Legally Exempt

Caregiver Enrollment Agency as to whether or not the legally exempt provider is in compliance with the additional local standards. (Districts only need to describe this procedure if the additional local standard is applied to legally exempt child care providers.)

Once our Department has determined whether or not the additional local standard has been met using the procedures outlined in number one our department will notify the EA in writing if the additional local standard has been met or not met.

The district will maintain a file, which documents the information used to determine whether or not the additional local standard has been met.

4. Described below is the justification for each additional standard.

Each additional local standard was enacted by the Orange County Department of Social Services to insure the safety and well being of the children being served through day care providers associated with or regulated by the county and OCFS. These additional local standards provide our agency with an opportunity to be proactive in potential problem areas. We can provide parents and/or caretakers with the necessary information to make educated decisions regarding their child's day care provider. Providers are given the opportunity to submit documents to explain or change any inaccuracies obtained from the local child welfare check.

APPENDIX G-9
PAYMENT TO CHILD CARE PROVIDERS FOR ABSENCES

The following providers are eligible for payment for absences:
 (Check any that are eligible)

- Day Care Center Legally Exempt Group
 Group Family Day Care School Age Child Care
 Family Day Care

Our district will only pay for absences to providers with which the district has a contract or letter of intent. Yes No

Base period selected (check one) 3 months 6 months

Number of absences allowed during base period:

Period	Routine Limits (# of days)	Extenuating Circumstances (# of days)	Total Number of Absences Allowed (# of days)
In a month	12	3	15
Base period	24	16	40

List reasons for absences for which the district will allow payment:

- **Illness (Child's)**
- **Medical Appointment/Treatment(Child's)**

List any limitations on the above providers' eligibility for payment for absences:

Provider must submit a note explaining the reason the child was absent upon billing for absence. In addition, parent may be requested to submit medical documentation for absences over five(5) consecutive days.

Note: Legally exempt family child care and in-home child care providers are **not** eligible to receive payment for absences.

APPENDIX G-10
PAYMENT TO CHILD CARE PROVIDERS FOR PROGRAM CLOSURES

The following providers are eligible for payment for program closures:

- | | |
|---|--|
| <input checked="" type="checkbox"/> Day Care Center | <input type="checkbox"/> Legally Exempt Group |
| <input type="checkbox"/> Group Family Day Care | <input type="checkbox"/> School Age Child Care |
| <input type="checkbox"/> Family Day Care | |

Our district will only pay for program closures to providers with which the district has a contract or letter of intent. Yes X No

Enter the number of days allowed for program closures (maximum allowable program closures is five days).

Five (5) days

List the allowable program closures for which the district will provide payment.

Up to five(5) snow days

Note: Legally exempt family child care and in-home child car providers are **not** allowed to be reimbursed for program closures.

**APPENDIX G-11
TRANSPORTATION, DIFFERENTIAL PAYMENT RATES, SLEEP**

Transportation

Describe below under what circumstances and limitations if any your district will use to reimburse for transportation, what type of transportation will be reimbursed (public vs. private), and how much your district will pay (per mile or trip). Note if paying for transportation, Appendix F will need to reflect this choice.

The Orange County Department of Social Services will limit the provision of transportation to and from day care centers to those consumers deemed by the Employment and Training Agency (ETA / One Stop) to be in need to transportation for approved work related activities. Transportation services will be limited consumers who meet the following criteria:

- **For consumers who are enrolled and receiving TANF Employment services through the Employment and Training Agency.**
- **For consumers who receive prior approval from their ETA Case manager, for transportation to and from a day care facility.**
- **For consumers who require transportation assistance to and from an approved employment related activity.**
- **For ETA consumers who have recently gained employment and require transportation assistance to maintain their employment and day care.**

All transportation services provided to Childcare Consumers will be limited to three months following employment. Any request for an extension of transportation will be requested through the ETA Case Manager, who will in turn notify this Department prior to granting an extension of transportation services.

Transportation services will be provided in one manner only, through the Community Transportation Solutions Program offered by a local non-profit, Occupations, Inc. This program provides all the employment related transportation services to the ETA for employment and employment related approved activities. The current contract with the LCDSS will be expanded to include transportation to and from day care facilities as approved by the local ETA.

During the CST calendar year of 2005, approximately 11,728 trips were provided to day care consumers over the course of the program year. OCDSS will reimburse the CST Program offered through Occupations at a rate of @ \$11.08 per trip, with a capped reimbursement for the year of \$130,000.

Differential Payment Rates

Indicate below the percentage above the market rate your district has chosen.

Accredited Programs may receive a differential payment up to **15%** above market rate.

Care during non-traditional hours may be paid up to _____ % above market rate. Are you paying for this?

Limitations to the above differentials are as follows:

Payments may not exceed 15% above market rate. However, if your district wishes to establish a payment rate that is in excess of 15% above the applicable market rate must describe below why the 15% maximum is insufficient to provide access within the district to accredited programs and/or care provided during non-traditional hours.

Sleep

The following describes the standards that will be used in evaluating whether or not to pay for child care services while a parent or caretaker that works a second or third shift sleeps and any limitations pertaining to payment:

The district will authorize eight hours of child care for any consumer who is required to work a third shift. The district will require written verification from the employer confirming consumer's actual work schedule.

Indicate the number of hours allowed by your district (maximum number of hours allowed is eight). **8**

**APPENDIX G-12
CHILD CARE EXCEEDING 24 HOURS, CHILD CARE SERVICES UNIT,
WAIVERS, BREAKS IN ACTIVITIES**

Child Care Exceeding 24 Hours

Child care services may exceed 24 consecutive hours when such services are provided on a short-term emergency basis or in other cases where the caretaker's approved activity necessitates care for 24 hours on a limited basis.

Describe any limitations for payment of child care services that exceed 24 consecutive hours.

OCDSS will NOT authorize for child care services on a short term emergency basis.

Child Care Services Unit

The Child Care Service Unit is the basis upon which a district will determine which household and/or family members should be counted in determining family size and countable family income.

Our district will include the following in the Child Care Services Unit (check which ones apply).

18 year old 19 year old 20 year old

-OR-

Our district will include only the following in the Child Care Services Unit when it will benefit the family (check which ones apply).

18 year old 19 year old 20 year old

Describe the criteria your district will use to determine whether or not an 18, 19 or 20 year old is included in the Child Care Services Unit.

Waivers

Districts have the authority to request a waiver of any regulatory provision that is non-statutory. Describe and justify why your district is requesting a waiver.

Breaks in Activities

Districts may pay for child care services for low income families during breaks in activities for a period not to exceed two weeks or for a period not to exceed one month where child care arrangements would otherwise be lost and the subsequent activity is expected to begin within that period (check one).

two weeks four weeks

Districts may provide child care services while the caretaker is waiting to enter an approved activity or employment or on a break between approved activities. The following low income families are eligible for child care services during a break in activities (check any that are eligible):

entering an activity waiting to begin employment break between activities