

Family Eligibility and Fee Determination

TA Session Frequently Asked Questions

This FAQ is issued in response to questions raised at the 2017-2018 Technical Assistance sessions on the topic of Family Eligibility and Fee Determination. The responses included below reflect the content of the General Policy the OEC is in the process of updating to align, as much as possible, fee determination under all OEC funding streams, and will help program administrators apply OEC and program policies consistently.

The guidance in the General Policy document will provide a common definition for included and excluded income, as well as information on the charging of fees associated with operating the program (late pick up fees, late payment fees, registration, etc.). Please be prepared to re-align your program's policies with the updated guidance which will be issued along with an updated fee scale in early 2019.

Policy

Q - What should be included in a hardship policy?

A - A hardship policy should outline procedures for a fee waiver so that the program establishes a standard that is applied equitably and consistently. The policy should address failure to pay, process for the temporary reduction in assessed fees, timeline applied, and the process for appealing a fee determination. When the policy is applied, all of these elements should be documented in the family's file.

Q - How does the OEC define family size?

A - Each funding stream should apply the appropriate definition of family, as outlined in the CDC contract or GP for SR. For families who do not meet this definition and for whom a question of family size remains, the tax return remains the best source for number in family. Recognizing that there may be situations where the tax return does not present the most current information on family size, OEC allows flexibility for families to identify in a legally documentable form that there are additional or fewer dependents in the household.

Q - Is a child in DCF care still considered a family of one?

A - Yes.

Other questions regarding family size may be directed to the OEC Grants and Contracts Managers (Melissa Camacho for School Readiness; Annette Carbone for Child Day Care and Smart Start).

Documentation

Q - What if a child's birth certificate is in a language other than English?

A - The birth certificate must be translated into English. This is reiterated in the FY 19 CDC contract 1.B.4.a.

Q - What if a family does not have IRS documents to use for income verification?

A - The IRS tax return is the primary source for determining family income. OEC recognizes that not all families will have a tax return from the previous year, that family circumstances change during the year, and that other sources (pay stubs, letters of attestation from disinterested parties) may provide more current information. General Policy B -02 will provide details on how to use pay stubs, notarized letters from employers and other documents to determine family fees.

Q - What if a family identifies that the tax return does not represent their current financial situation?

A - If a family notifies the program (at enrollment or any time during the program year) that the tax return does not represent their financial situation, the program may use the four most recent, consecutive paystubs (from one or more employers) and take an average. Another option would be to obtain a letter(s) from the employer(s) to obtain their information on the average number of hours worked per week and their hourly wage.

Q - What documentation should be maintained when a hardship reduction is provided to a family?

A - The program should document that it determined the family fee to be charged according to the OEC fee scale. If there is a reduction in what is actually collected, the program should apply its hardship policy and any reduction in amount collected should be documented as fee waived.

Q - Is it necessary for the program to ask for Social Security numbers?

A - The OEC does not require that you collect the social security number for children or family members.

Q - How should a program protect confidential information?

A - Programs are required to protect confidential information under FERPA (Family Educational Rights and Privacy Act, 20 U.S.C. Sec. 1232g) and policies for School Readiness and Child Day Care programs. ALL confidential information (any name, number or other information that may be used, alone or in conjunction with any other information, to identify a specific individual) must be appropriately safeguarded with access limited only to those who must utilize that information.

Income

Q - Why is income from rental property or other business ventures included?

A - This income is included because it is a direct form of support to the family.

Q – Can a Profit/Loss Statement be used to determine income for someone who is self-employed?

A – While a Profit/Loss Statement serves to substantiate self-employment, it does not take into account other income the household may be earning. The tax return cover page must also be obtained. Income for the household will be determined by what is listed under “Line 22 Total Income” (rather than Adjusted Gross Income).

Q – Are child support payments considered as part of a household’s income?

A – No, child support payments are not included as part of a household’s income; however, alimony payments are considered a source of income. Clarification can be provided through divorce settlement documents.

Q - What if a family reports no income?

A – After a reasonable attempt to verify this, a family reporting to be without income would be charged the lowest fee on the fee scale, and the corresponding lowest fee. The program may apply their

hardship policy if the family requests relief from paying the weekly fee. Child Day Care program enrollment must include 80% of families who are earning income through employment.

Q - If a family is living with a relative or another family, how is income determined?

A - For families that are sharing living quarters, it is critical that consideration be given to whether the family meets the McKinney-Vento Act definition of homeless which includes “individuals who lack a fixed, regular, and adequate nighttime residence¹”. Consult your community McKinney-Vento liaison (<https://portal.ct.gov/SDE/Homeless/Homeless-Education/How-To#schooldistricts>) or School Readiness liaison for information.

Q - Is it appropriate to consider income that does not appear on a tax return?

A - If a family volunteers information about additional income that would be taken into consideration when determining family eligibility or fees according to the definition of included family income.

Q - If a program is funded only for full-time spaces and the family receives a Care 4 Kids certificate for half time, how is the family fee determined?

A - If the OEC funds the program for full-time spaces, it is expected that families are enrolled in the space to meet this requirement and that the corresponding fee be charged.

Q - Are families required to apply for Care4Kids?

A – While it can be strongly encouraged, a family cannot be required to apply for Care 4 Kids. Care4Kids staff can provide support to assist families with applying. Although families may have many reasons for choosing not to apply, programs can provide families with information on the full cost of care, and the portion of that cost that a Care4Kids certificate contributes to the fiscal operations of the program.

Miscellaneous

Q - What child care management software are programs using to support their fiscal operations?

A - The response of the group included: ChildPlus (majority), Easy Care, ProCare, Power School (public school).

¹ Subtitle VII-B of the McKinney-Vento Homeless Assistance Act (42 USC §§11431-11435), reauthorized in 2001 by Title X, Part C of the No Child Left Behind Act (subsequently referred to in this brief as the McKinney-Vento Act)