
Care 4 Kids Program



Program Operations TRANSMITTAL

Transmittal Number: C4K-POL-19- 04

Date: September 18, 2019

To: Sherri Sutera, Program Director
Care 4 Kids Program

From: Harriet Feldlaufer, Director of Early Care and Education
Office of Early Childhood

CC: Distribution List

Subject: **Grace Period for Families Experiencing Homelessness**



Program Issue: Current procedures do not include a 90-day grace period for families experiencing homelessness to submit application or redetermination documents, which is required by federal law.

Background: The Child Care and Development Block Grant (CCDBG) Act of 2014 Pub. L. 113-186 and 45 CFR § 98.51 requires lead agencies to establish a grace period that allows children experiencing homelessness a reasonable time to obtain required Care 4 Kids documents necessary for program eligibility.

To comply with the CCDBG law, the OEC will provide a 90-day grace period for all families experiencing homelessness as defined in the McKinney-Vento Homeless Education Assistance Improvements Act of 2001, 42 U.S.C. 11434a. These families can be determined eligible and a certificate issued without the necessary required documents as defined in the Care 4 Kids regulations 17b-749.

Directive: Effective September 30, 2019, this change will apply to all children and youths experiencing homelessness as defined in the McKinney-Vento Homeless Education Assistance Improvements Act of 2001, 42 U.S.C. 11434a. The definition states:

“...The term ‘homeless children and youths’

(A) means individuals who lack a fixed, regular, and adequate nighttime residence (within the meaning of section 11302 (a) (1)); and

(B) includes--

(i) children and youths who are sharing the housing of other persons due to loss of housing, economic hardship, or a similar reason; are living in motels, hotels, trailer parks, or camping grounds due to the lack of alternative adequate accommodations; are living in emergency or transitional shelters; or are abandoned in hospitals;

(ii) children and youths who have a primary nighttime residence that is a public or private place not designed for or ordinarily used as a regular sleeping accommodation for human beings (within the meaning of section 11302 (a) (2) (C));

(iii) children and youths who are living in cars, parks, public spaces, abandoned buildings, substandard housing, bus or train stations, or similar settings; and

(iv) migratory children (as such term is defined in section 6399 of title 20) who qualify as homeless for the purposes of this subtitle because the children are living in circumstances described in clauses (i) through (iii).”

All eligible families with children and/or youths experiencing homelessness as defined above will be granted a 90-day grace period to obtain required Care 4 Kids documents necessary for program eligibility.

At the end of the 90-day grace period all documents must be received by Care 4 Kids to continue program eligibility.

Procedure

Confirmed homeless status:

1. Application/ redetermination received and family has indicated 'yes' to either of the two housing questions. Dedicated C4K case manager will place two outbound calls to all available phone numbers.
2. When a parent is reached, the case manager will use the OEC approved screening tool to determine if the family meets the definition of homelessness as defined above.
3. If no documentation is provided with the application/redetermination then the case manager confirms program eligibility requirements by family's self-declaration of the following:
 - participation in an approved work and/or training activity,
 - income,
 - need for care, work schedule,
 - child's citizenship,
 - child immunization,
 - and child's date of birth
4. If through the self-declaration process a family is determined ineligible, the case manager will deny the case.
5. If the family is determined eligible based on the self-declaration process, case manager will generate a missing information notice (MIN) with a 90-day due date. If verifications have not been received, at the end of the 60th day the case manager will send a 30 day MIN.
6. If a Parent Provider Agreement (PPA) is received and complete, and family meets all other program eligibility requirements, a 12-month certificate is issued.
7. If family has not submitted documentation at the end of the 90-day grace period then certificate should be terminated. Good faith policy will not apply to these cases, all outstanding documentation must be received within the 90 day grace period.
8. If after full review of all eligibility information, the family is determined ineligible, benefits will not be recouped.

Unable to determine homeless status

1. Application/ redetermination received and family has indicated 'yes' to the housing questions. Dedicated C4K case manager will place two outbound calls to all available phone numbers.
2. If unable to reach the family, the family will not be determined homeless and case will be processed accordingly.
3. If able to reach family and after using the questionnaire the family does not meet the definition of homeless the case will be processed accordingly.

Questions concerning this transmittal can be referred to Office of Early Childhood at 860-500-4421.

HF:ct