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# Care 4 Kids Program



## Program Policy TRANSMITTAL

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Transmittal Number: C4K-POL-21-03

Date: March 17, 2021

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**To:** Sherri Sutera, Program Director  
Care 4 Kids (C4K)

**From:** Beth Bye, Commissioner  
Office of Early Childhood 

**CC:** Distribution List

**Subject:** **Determining Level of Care**

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**Program Issue:** Every three years the Office of Early Childhood (OEC) is required to complete an Error Rate Review to determine Connecticut's payment error rate. The OEC Error Rate Review completed in June 2019 found a high number of payment errors related to income calculations process. Many of these errors were related to the Care 4 Kids (C4K) business processes regarding multi-step verification processes that delay the issuance of certificates and cause payment errors.

**Background:** C4K currently uses a laborious process to determine care level for families receiving child care benefits that involves over-verification by the parent to support the information contained in their application. Chapter 45 of the Code of Federal Regulations (CFR) does not specify how the lead agency shall determine care level or even that there should be a comparison between the hours worked on income documentation to the activity schedule of the parent.

45 CFR § 98.21 (f) provides "Lead Agencies must take into consideration children's development and learning to promote continuity of care when authorizing child care services."

45 CFR § 98.21 (g) provides "Lead Agencies are not required to limit authorized child care services strictly based on the work, training, or education schedule of the parent(s) or the number of hours the parent(s) spend in work, training, or educational activities."

Regulations of Connecticut State Agencies (RCSA) § 17b-749-04 (e) (4) provides "Parents shall maintain continuous involvement in an approved work or employment services activity. Assistance shall be available only during the hours the parent or family member is participating in an activity listed in subdivision (2) of this subsection."

RCSA § 17b-749-13 (b) (1) provides "The CCAP administrator shall calculate the number of hours of care that are needed for each eligible child. The number of hours of care authorized shall be based on all of the following factors and shall be limited to not more than twelve hours in a twenty-four hour period: (A) hours of the work or employment services activity; (B) the availability of a parent who is living with the child to provide care; (C) the hours the child is in school; (D) travel time to and from the approved activity; (E) and the hours of care specified on the child care agreement form."

RCSA § 17b-749-13 (b) (2) provides "Care shall not be authorized during the hours the child is in school, an academic or home schooling program, when a parent living in the home is available and capable of providing care or outside the activity schedule, including travel and lunch time."

RCSA § 17b-749-13 (b) (3) provides “The time needed to commute to and from the activity shall be taken into consideration when determining the actual number of hours of care that is needed. Travel time shall be limited to a maximum of one hour per day, unless the parent verifies that additional time is needed.”

RCSA 17b-749-13 (b) (10) provides “The number of hours authorized shall not exceed the number of hours specified on the child care agreement form.”

RCSA sections cited above are all contradictive in nature. RCSA § 17b-749-13 (b) (1) is specific that all factors shall be taken into account when determining the authorized hours of care for each eligible child. The purpose of this transmittal is to provide clarification as to how authorized hours of care shall be determined and to streamline processes for both families requesting child care assistance and C4K staff while still operating within the confines of the CFR and RCSA.

### **Policy Directive:**

#### **A. Determining the Level of Care**

- Effective April 1, 2021, in determining the level of care, C4K shall utilize and compare the self-attested activity schedule and the hours listed on the income documentation to determine the care level for the family.
- C4K shall compare the self-attested activity schedule listed on the application or redetermination and the total hours worked listed on the income documentation or employment letter. If the self-attested activity schedule is **within 15 hours weekly** of the total hours listed on the income documentation or employer letter, the family shall be approved for the higher number of hours. No additional verification is needed if the discrepancy is between 1 and 15 hours. If the discrepancy is more than 15 hours, the worker shall place an outbound call to the parent first, followed by the employer if the parent is not reachable, to verify the average number of hours worked per week. The phone call and the verification of hours shall be captured in the case notes.

Example: If the income documentation or employer letter indicates a total of 15 hours weekly and the self-attested activity schedule totals 29 hours weekly, the parent shall be approved for 29 hours of care.

If a parent provides information on the application/redetermination for non-approved activity (i.e. higher education or activity not approved by JFES) this non-approved activity should be excluded.

#### **B. Travel Time**

Effective April 1, 2021, travel time shall be determined in increments of 30 minutes.

- If a parent indicates 0 minutes of daily, roundtrip travel on the application or redetermination, or if the child care location is the same location as the approved activity, no travel time shall be provided.
- If a parent indicates an amount between 1 and 30 minutes of daily, roundtrip travel on the application or redetermination, the parent shall be provided 30 minutes of travel time;
- If a parent indicates an amount between 31 and 60 minutes of daily, roundtrip travel on the application or redetermination, the parent shall be provided 60 minutes of travel time;
- If a parent indicates they need more than 61 minutes of daily, roundtrip travel on the application or redetermination, C4K shall make an outbound call to the parent to verify the reason for needing

more than 60 minutes of travel time. The phone call and the parent's reasoning shall be captured in the case notes.

- If 61-90 minutes of daily, roundtrip travel is needed, 90 minutes shall be provided;
- The same pattern shall be applied to any parent requiring more than 91 minutes of travel time.
- If C4K is unable to reach a parent to verify more than 61 minutes of daily, roundtrip travel is needed, C4K shall approve 60 minutes of travel time without additional verification.

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

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