

## Early Learning and Care Division (ELCD) Responses to CAPPA - 2

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| <p><b>1. Does CDE fiscal have a plan to ensure agencies apportionments keep coming if they are impacted with severe staffing shortages as we anticipate while we may be impacted we will continue to need to make provider payments?</b></p>  | <p><i>Apportionments are based on reported data received by each contractor. If a contractor is impacted in such a way that they cannot report data, they should contact CDNFS to make them aware of the situation. CDNFS will work individual agencies to ensure that apportionments are sufficient to cover provider payments.</i></p>  |
| <p><b>2. Will CDE relax or push back due dates for reports (801A, 801B, self-review etc) if agencies are severely impacted by staffing shortages? All our resources will be going to ensure providers are paid.</b></p>   | <p><i>The CDD-801A and CDD-801B reports are due the 20<sup>th</sup> of each month, however, the report is not locked until 90 days after the due date. This provides agencies additional time to review and update information submitted. For further questions, please contact the CDMIS office by email at <a href="mailto:CDMIS@cde.ca.gov">CDMIS@cde.ca.gov</a></i></p> <p><i>The State Superintendent of Public Instruction (SSPI) will work in collaboration with the Administration for Children and Families regarding reporting flexibilities.</i></p> |
| <p><b>3. In a crisis situation, would an agency extend 12 month eligibility so parent don't have to come in to recertify (and reduces workload for APPs who may be operating with severely reduced staff)? Suggestion: Extend for the duration of the state of emergency plus 3 months.</b></p> | <p><i>Currently statute requires that families be certified for no less than 12 months.</i></p> <p><i>Pursuant to Budget Act of 2017 Implementation FAQs <a href="https://www.cde.ca.gov/sp/cd/ci/budgetactfaq2017.asp">https://www.cde.ca.gov/sp/cd/ci/budgetactfaq2017.asp</a> <b>Question 25.</b> At this time, the Implementation Guidance does not address the timing for recertifying families.</i></p>   |

**Would agencies be allowed flexibility (or held harmless) in adjusting board approved policies to accommodate parents or to deal with a seriously reduced work force:**

**4. Extending timelines for processing changes?**

*Please clarify what changes are being referred to.*

**5. Timelines for making provider payments?**

*The Code of Federal Regulations, Title 45, requires reimbursement to providers within 21 days of receipt of invoice. ELCD contracted agencies should have a plan for reimbursing providers in the event of an emergency.*

**6. Regulations**

*Please clarify what this means.*

**7. Allow in home exempt care even if we can't meet min wage requirements?**

*This will require further review and/or research.*

**8. If recertifying a family... the ability to approve a parent's services based on what they normally work and not on any reduced hours due outbreak.**

*Contractors must recertify based on the family's current need in accordance with 5 CCR Section 18103 included in the 12-Month Eligibility Implementation Guidance in Management Bulletin (MB) 17-14. A family may request an increase to their certified hours of need once they return to a full schedule.*

**9. Agencies are making contingency plans to allow/accommodate staff to work remotely, will it be acceptable to issue NOA's and**

*Yes, in accordance with EC sections 8227.3 and 8262.1 and 8262.2 contractors may maintain records electronically and are authorized to convert records from a paper format to an electronic format. Please refer to Management Bulletin 16-02 <https://www.cde.ca.gov/sp/cd/ci/mb1602.asp> for additional guidance.*

**Certificates electronically as it is not likely or feasible that remote workers will have full access to printers or postage for any notices?**

**10. If an agency/contractor has to close to due to the declared State-of-Emergency how should the payment to providers process be managed. We all have policies around getting payments to providers in a timely manner, but if there is not any staff to do that work (such may be the case at a County Office of Education), how does that play out?**

*The Code of Federal Regulations, Title 45, requires reimbursement to providers within 21 days of receipt of invoice. ELCD contracted agencies should have a plan for reimbursing providers in the event of an emergency.*

**11. In regards to the monthly reporting due to CDE, during a declared State of Emergency, will there allowances for late or delayed reports**

*The State Superintendent of Public Instruction (SSPI) will work with the Governor's Office to issue an Executive Order that will provide further guidance on this issue.*

**12. As school districts close throughout the state, will CDE allow for full-time child care reimbursement for school aged kids to go the parent's existing part-time child care provider during this State of Emergency?**

*Parents may request an increase to their certified schedule at any time. In accordance with 5 CCR Section 18084.2, included in the 12-Month Eligibility Implementation Guidance in Management Bulletin (MB) 17-14 contractors must approve services based on the families need for child care at the time of the request.*

