

**Alternative Payment  
Monitoring Unit  
Information Session**

Presenters: Vanessa Saunders, Manager  
Sandy Patitucci, Consultant

CALIFORNIA DEPARTMENT OF EDUCATION  
Tom Torlakson, State Superintendent of Public Instruction

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**AGENDA**

- Alternative Payment Monitoring Unit Staff
- State Improper Payments Report Summary
- APMU Process Overview
- APMU Review Guide Overview
- Questions

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**APMU STAFF**

Alternative Payment Monitoring Unit

- Vanessa Saunders, Manager
  - Esmeralda Ramirez, Analyst
  - Jumaane Cowan, Analyst
  - Miguel Zuloaga, Analyst
  - Amber Jones, Analyst
  - Michelle Clavecilla, Analyst

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## FEDERAL REVIEW SUMMARY

Error Rate Reviews are Required by Federal Regulations

- Federal target for each state is 10%
- States above 10% have to do a statewide error reduction plan
- States too far above 10% receive a visit from federal auditors

**California's current State Error Rate is 5.82**

California's system for meeting these federal targets is to conduct reviews of alternative payment and full-day child care programs, estimate errors, and implement error rate reduction plans where needed.

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## State Improper Payments Report Summary

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## COMMON ERRORS BASED ON FISCAL YEAR (FY) 2014 STATE IMPROPER PAYMENTS REPORT

- Recertification not completed within 12 months.
- Inadequate documentation to determine need for services.
- Incorrect Regional Market Rate ceiling being chosen based on certified need.
- Incorrect calculation of the monthly subsidy based on days and hours used.

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## APMU Review Guide Overview

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## APMU REVIEW PROCESS

**When a contractor is selected for a APMU Review the following will occur:**

- Pre-notification of review
- Review process
- Conclusion of the review
- Post Review

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## APMU Process Overview

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## APMU REVIEW PROCESS

**Pre-notification**

- Four weeks before the review a call will be made to the agency to ensure that the APMU staff has:
  - Current contact information
  - To request the most current Parent and Provider Written Material(s)
  - Inquire about the contractors family fee process

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## APMU REVIEW PROCESS

- A notification letter will be sent out at least three (3) weeks before the review and will provide the following information
  - Week of the review
  - Date and time of the Entrance Meeting
  - Month that will be reviewed
  - Provide information on how to prepare for the review
  - Request a staff person be present during the review
- A list of family files to be reviewed will be sent out one (1) week before the review

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## APMU REVIEW PROCESS

**During the week of the APMU review**

- Conduct an entrance meeting
- Review family data files for administrative errors in the areas of:
  - Eligibility
  - Need
  - Family Fee
  - Provider Reimbursement
- Answer questions
- Provide technical assistance

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## APMU REVIEW PROCESS

**Conclude the APMU review with:**

- Pre-exit Meeting
  - At the end of each day or the day before the Exit Meeting
  - Summarize the findings to date
- Exit Meeting
  - Summary of Findings
  - Error Calculations Report
  - Data Input form for any file cited with an error, the form contains the citation with detailed error notes and when applicable copies of the documents from the file that support the error citation

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## ALTERNATIVE PAYMENT MONITORING UNIT (APMU) REVIEW GUIDE

*Alternative Payment Review Guide*



**Early Education and Support Division**  
September 2006

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## Introduction and Overview

Purpose of training session today:

1. To clearly describe standards and procedures for doing a review – to make our process transparent.
2. To empower contractors to do their own reviews – replicate what we do.
3. To distinguish between errors:
  - material error (federal term is "improper payment") and
  - file error (federal = administrative error)
4. To provide some guidance on best practices – to make implementation of regulations easier when we can.

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## 801A MONTHLY POPULATION REPORT APMU 1.1

The report should include all children that have **received** any amount of EESD subsidized child care and development services during the report month.

- Revise the report as soon as possible if discrepancies are found.

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## CERTIFICATION AND RECERTIFICATION APMU 2.1

	Certification and Recertification (Application for Services)	Findings
<b>APMU 2.1</b>	Is the Application for Services present (5 CCR, Section 18083)?	<b>Material:</b> If the Application for Services is not present in the family data file an error will be determined in eligibility. The error will equal the cost of services provided for the sample month or the portion of the month in which there was insufficient documentation, whichever is less.
<b>APMU 2.2</b>	Is the Application for Services complete (5 CCR, Section 18082[b])? Was the application completed prior to serving the child (5 CCR, Section 18082[b])?	<b>Material:</b> If services are provided prior to the Application for Services being completed and <b>not</b> all supporting documentation is in the family data file, an error will be determined as in 2.1. <b>File:</b> If the Application for Services is incomplete, however the supporting documentation is present in the family data file, an error will be determined in eligibility.
<b>APMU 2.3</b>	If applicable, did the recertification occur within 12 months (5 CCR, Section 18103)?	<b>Material:</b> If the recertification date on the Application for Services exceeds the 12 month (3 months at risk) after the date of prior certification, an error will be determined in eligibility. The error amount will be determined as in 2.1. <b>File:</b> If the recertification date on the Application for Services exceeds 12 months (3 months at risk) after the date of the prior certification, however the certification is completed before the review month, an error will be determined in eligibility.

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## CERTIFICATION AND RECERTIFICATION APMU 2.3

**At-Risk**

- Cannot be re-certified as at-risk for an additional 3 months.
- If they continue in child development services, they must be certified in another eligibility category (CPS?) prior to the 3 months ending.

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## CalWORKs CONTRACT ELGIBILITY

<p><b>CalWORKs Stage 2</b> <b>APMU 3.1</b></p> <ul style="list-style-type: none"> <li>• Entry – when the CWD determines the parent is stable.</li> <li>• Service – as long as the parent remains eligible and has need.</li> <li>• Exit – during the 24<sup>th</sup> consecutive month that the parent is not receiving cash aid.</li> </ul>	<p><b>CalWORKs Stage 3</b> <b>APMU 3.4</b></p> <ul style="list-style-type: none"> <li>• Entry – during the 24<sup>th</sup> consecutive month the parent not receiving cash aid (letter to parent).</li> <li>• Service- the parent must remain eligible and have need.</li> <li>• Exit – when funds are insufficient and parent is high income or when parent is not eligible.</li> </ul>
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## ELIGIBILITY APMU 4

For a family to receive services, they must be deemed eligible in one (1) of the categories of eligibility:

**CHILD:**

- Child Protective Services (CPS)
- At Risk

**CHILD/FAMILY:**

- Exceptional need (13-21 years of age)

**FAMILY:**

- Income eligibility
- Current aid recipient
- Homelessness

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## CHILD ELIGIBILITY CPS APMU 4.1

Child Eligibility – CPS	Findings
<p><b>APMU 4.1</b></p> <p>Does the child have a written referral from the local county welfare department dated within six (6) months immediately preceding the date of Application for Services (5 CCR, Section 18092)?</p> <p>Does the statement include child care and development services are a necessary component of the CPS plan (5 CCR, Section 18092(a))?</p> <p>Does the written referral include the probable duration (5 CCR, Section 18092(c))?</p> <p>Does the written referral include the name, address, telephone number, and the signature of the legally qualified professional (5 CCR, Section 18092(d))?</p>	<p><b>Material:</b> If the CPS referral is not dated within six (6) months immediately preceding the date of the Application for Services, an error will be determined in eligibility.</p> <p><b>Material:</b> If the CPS Plan does not include a statement indicating child care and development services are a necessary component of the CPS plan, an error will be determined in eligibility.</p> <p><b>Material:</b> If the written referral is missing or incomplete, a material error will be determined in eligibility.</p> <p><b>The above material errors will equal the cost of services provided for the sample month or the portion of the month in which there was insufficient documentation, whichever is less.</b></p>

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## CHILD ELIGIBILITY AT RISK

### APMU 4.2

	Child Eligibility – At-Risk	Findings
<b>APMU 4.2</b>	<p>Is there a statement by a legally qualified professional that the child is at risk of abuse or neglect (5 CCR, Section 18092(b))?</p> <p>Does the statement include that child care and development services are needed to reduce or eliminate that risk (5 CCR, Section 18092(b))?</p> <p>Does the written referral include the probable duration (5C 8283(b)(1)(B)) and (5 CCR, Section 18092(c))?</p> <p>Does the written referral include the name, address, telephone number, and the signature of the legally qualified professional (5 CCR, Section 18092(d))?</p>	<p><b>Material:</b> If the written referral is missing or incomplete, an error will be determined in eligibility. <b>Material:</b> If the At-Risk plan does not include a statement indicating that child care and development services are needed to reduce or eliminate that risk, an error will be determined in eligibility.</p> <p><b>The above material errors will equal the cost of services provided for the sample month or the portion of the month in which there was insufficient documentation, whichever is less.</b></p>
<b>APMU 4.3</b>	<p>Were At-Risk services provided for a maximum of three (3) months (5C 8283(b)(1)(B)) and (5 CCR, Section 18092(c))?</p>	<p><b>Material:</b> If At-Risk services were provided for more than three (3) months, an error will be determined in eligibility. The error will equal the cost of services provided for the sample month or the portion of the month in which services exceed the three (3) month time frame.</p>

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## CHILD ELIGIBILITY AT-RISK CHILDREN

### APMU 4.2

- Eligibility for At-Risk children can also be established by a written statement from a County Social Worker.
- Legally qualified professional is much more common.

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## CHILD ELIGIBILITY EXCEPTIONAL NEEDS

### APMU 4.4

	Child Eligibility – Exceptional Needs	Findings
<p><b>NOTE:</b> To receive a waiver of age eligibility (13-21 of age), the family must be otherwise eligible and the child must have an active Individualized Education Program (IEP) and a letter from a legally qualified professional stating that the child is incapable of self care.</p>		
<b>APMU 4.4</b>	<p>Is the child between the ages of 13-21 years of age (5 CCR, Section 18089)?</p>	<p><b>Material:</b> If the child is not between the ages of 13-21, an error will be determined in eligibility. The error will equal the cost of services provided for the sample month or the portion of the month in which the child was <b>not</b> age eligible, whichever is less.</p>
<b>APMU 4.5</b>	<p>Is there evidence that the child has an active IEP and a statement signed by a legally qualified professional stating that the child is incapable of self care (5 CCR, Section 18089(b)(1))?</p>	<p><b>Material:</b> If there is no evidence of an active IEP, an error will be determined in eligibility. <b>Material:</b> If a statement signed by a legally qualified professional is missing or incomplete, an error will be determined in eligibility. <b>Material:</b> If the statement, signed by a legally qualified professional does not include evidence that the child is incapable of self care, an error will be determined in eligibility.</p> <p><b>The above material errors will equal the cost of services provided for the sample month or the portion of the month in which there was insufficient documentation, whichever is less.</b></p>

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## CHILD ELIGIBILITY EXCEPTIONAL NEEDS

### APMU 4.4

Child is over 13 with an IEP.  
Eligibility is a two prong test:

1. The child must have an active IEP,  
and
2. The child must have a written  
statement by a legally qualified  
professional stating the child cannot  
care for themselves if alone.

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## FAMILY ELIGIBILITY INCOME

- Employment Income  
[APMU 4.6](#)
- Self Employment Income  
[APMU 4.10](#)
- Self Declaration of Income  
[APMU 4.14](#)

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## EMPLOYMENT INCOME

### APMU 4.6

	Family Eligibility – Income Eligibility Employment Income	Findings
<b>APMU 4.6</b>	Is there a release authorizing the contractor to contact the employee(s) (5 CCR, Section 18084(a)[1][A])? <b>OR</b> A declaration signed under penalty of perjury indicating such a request for income verification would adversely affect their employment (5 CCR, Section 18086(b)[2][F])?	<b>File:</b> If either the release or declaration is not present or incomplete, an error will be determined in eligibility.
<b>APMU 4.7</b>	Are there payroll check stubs and/or other record of wages issued by the employer (5 CCR, Section 18084(a)[1][B])?	<b>Material:</b> If the required employment documentation is not present, an error will be determined in eligibility. The error will equal the cost of services provided for the sample month or the portion of the month in which there was insufficient documentation, whichever is less.
<b>APMU 4.8</b>	Is the income documentation current (the month preceding the certification or the family's current and ongoing income) (5 CCR, sections 18084(a)[1][E] and 18096)?	<b>Material:</b> If the income documentation is not current and cannot be calculated, an error will be determined in eligibility. The error amount will be determined as in 4.7.
<b>APMU 4.9</b>	If applicable, did the contractor verify income documentation (5 CCR, Section 18084(b)[2])?	<b>Material:</b> If the contractor did not verify income of a parent and verification was necessary an error will be determined in eligibility. The error amount will be determined as in 4.7.

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**EMPLOYMENT INCOME  
VERIFICATION OF INCOME**  
APMU 4.7

- Contractors do not always have to contact the employer to verify income.
  - If the check stubs:
    1. Are from an employer known to the contractor;
    2. The hours and pay-rate on the stubs are consistent with the known practices of that employer (and parent's story); then no independent verification required.

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**EMPLOYMENT INCOME  
VERIFICATION OF INCOME**  
APMU 4.9

- If you have any questions at all, you must seek to have those questions answered (i.e., independent verification).
  - Independent means independent of the parent.
- Request additional documentation if necessary

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**FAMILY ELIGIBILITY  
INCOME (Cont.)**

- Self Employment Income  
APMU 4.10
- Self Declaration of Income  
APMU 4.14

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## FAMILY ELIGIBILITY

- Current Aid Recipient  
[APMU 4.15](#)
- Homelessness  
[APMU 4.16](#)

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## FAMILY SIZE [APMU 5.1](#)

	Family Size	Findings
<b>NOTE:</b> An error in family size may also result in an error in eligibility and/or family fee.		
<b>APMU 5.1</b>	Is there documentation for all the children reported in the family size that indicates the relationship of the child to the parent (e.g. birth certificates, court orders, etc.) (5 CCR, Section 18100(a)[1])?	<b>Material:</b> If the supporting documentation for the child under review is not present in the family data file, an error will be determined in eligibility. The error will equal the cost of services provided for the sample month or the portion of the month in which there was insufficient documentation, whichever is less. <b>File:</b> If the supporting documentation for any child(ren) not being reviewed is not present in the family data file, an error will be determined in eligibility.
<b>APMU 5.2</b>	If applicable, is the presence or absence of a parent documented (e.g. records of divorce, custody agreement, rental receipt or rental agreement etc.) (5 CCR, Section 18100(a)[2])?  If applicable, was there a recent departure of a parent, is there subsequent documentation verifying the absence of a parent within six (6) months of applying or reporting the change of family size (5 CCR, Section 18100(a)[3])?	<b>Material:</b> If the presence or absence of a parent is not documented, an error will be determined in eligibility. <b>Material:</b> If there is not documentation verifying the absence of a parent within six (6) months of applying or reporting the change of family size, an error will be determined in eligibility.  The above material errors will be determined as in 5.1.

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## FAMILY SIZE [APMU 5.1](#)

Parents **are required to provide** supporting documentation regarding the number of children and parents in the family.

Note:

- Per E.C. 48200 , California's compulsory education law, children who are 18 and have been continuously attending high school are minors.
- These children should be treated as minors in the family size, unless
  - They have their own children
  - They are emancipated

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## FAMILY SIZE

### APMU 5.2

**BEST PRACTICES - Establishing the number of parents in the family .**

- For AP programs, especially in Stages 2 and 3, documentation from welfare is easiest.
- For all other types of contracts, looking for “official” documentation is often easier than re-documenting every year.
  - Food Stamps, Medi-Cal, Healthy Families
  - Medical records or School records
- Don't track down the absent parent

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## INCOME CALCULATION

### APMU 6.1

	Income Calculation	Findings
<b>APMU 6.1</b>	Is there an income calculation worksheet present (5 CCR, Section 18096(a))?	<b>File:</b> If the income calculation worksheet is missing or incomplete, however the income is calculated correctly, an error will be determined in eligibility.
<b>APMU 6.2</b>	Was the income calculated and documented correctly to include all individuals counted in the family size (5 CCR, sections 18096 & 18078(q))?	<p><b>Material:</b> If the monthly income is miscalculated and the family is determined to be over-income, an error will be determined in eligibility. The error will equal the cost of services provided for the sample month or the portion of the month in which the family was over-income, whichever is less.</p> <p><b>Material:</b> If there is insufficient income documentation present in the family data file to substantiate the family's total countable income, an error will be determined in eligibility. The error will equal the cost of services provided for the sample month or the portion of the month in which there was insufficient documentation, whichever is less.</p> <p><b>File:</b> If the monthly income is miscalculated, however, it does not affect the family's eligibility or family fee, an error will be determined in eligibility.</p>

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## INCOME CALCULATION

### APMU 6.1

- The parent is responsible for providing all documentation of the family's total countable income on a timely basis.
- Calculate total countable income based on income information reflecting the family's current and on-going income.
- Ensure that the income was calculated correctly taking into account the frequency of pay (e.g. bi-weekly or two times a month)
- Calculation Worksheet (with math)
- Income miscalculations can result in eligibility or family fee errors

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## FAMILY FEE

### APMU 7.1

Total countable income and family size are the two factors which determine if a family fee is to be assessed. A new family fee schedule took effect on July 1, 2014, and applies to both existing and new families in the program.

In determining whether a part-time or full-time monthly fee should be assessed: If the total certified hours are less than 130 hours, the part-time fee applies, or if the total hours are 130 hours or more, the full-time fee applies. If determining the family fee based on a weekly certified need, multiply the number of certified hours by 4.33 then assess the family fee according to the assessment above.

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## FAMILY FEE

### APMU 7.1

	Family Fee	Findings
APMU 7.1	Was the family fee assessed correctly based on income and family size (5 CCR, Section 18109[a]j)?	<b>Material:</b> If the family size and/or income are determined incorrectly and affect the assessment of the family fee, an error will be determined in family fee. <b>Material:</b> If the assessment of the family fee is incorrectly assessed (i.e., part-time vs full-time monthly), an error will be determined in family fee.  <b>The above material errors will equal the difference in the family fee assessed and the correctly determined family fee.</b>
APMU 7.2	Was the family fee collected (5 CCR, sections 18109[a]j) and [k])?	<b>Material:</b> If family fees were not collected, an error will be determined in family fee. The error amount will be determined as in 7.1.
APMU 7.3	If applicable, did the contractor retain a copy of the family fee receipt (5 CCR, Section 18113[b]j)?	<b>File:</b> If the family fee receipt is missing or incomplete, however the family fee was assessed correctly, an error will be determined in family fee.
APMU 7.4	Does the receipt include the amount paid; the date of payment, rate of payment, and the period of service (5 CCR, Section 18113[a]j)?	
	Did the contractor adopt policies regarding fee assessment, collection and the possible consequences for delinquent payment of fees (5 CCR, sections 18109[c], 18114, 18115, & 18116)?	<b>Material:</b> If delinquent family fees are not collected and do not follow the contractors policy, an error will be determined in family fee. The error will equal the delinquent family fee not collected in the sample month. <b>File:</b> If the policy does not align with regulatory requirements, an error will be determined in family fee.

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## NEED FOR SERVICES

### APMU 8

- Employment – [APMU 8.1](#)
- Self Employment – [APMU 8.6](#)
- Seeking Employment – [APMU 8.11](#)
- Vocational Training – [APMU 8.15](#)
- Parental Incapacitation – [APMU 8.20](#)
- Child Protective Services – [APMU 8.24](#)
- At Risk – [APMU 8.25](#)
- Seeking Permanent Housing – [APMU 8.26](#)

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**NEED  
EMPLOYMENT**  
APMU 8.1

	Need – Employment	Findings
<b>APMU 8.1</b>	Does the parent have a release authorizing the contractor to obtain information regarding days and hours worked? <b>OR</b> A declaration signed under penalty of perjury indicating such a request for employment documentation would adversely affect their employment (5 CCR sections 18086(b)(2)(F) and 18086(d))?	<b>File:</b> If the contractor does not have a release authorizing the contractor to contact the employer, or a declaration indicating that such a request would adversely affect their employment, an error will be determined in need.
<b>APMU 8.2</b>	Does the documentation indicate the pay period, days, and hours of employment (e.g. payroll check stubs, employer verification, contact with employer, etc) (5 CCR, Section 18086(b))?	<b>Material:</b> If the required employment documentation is not present in the family data file, an error will be determined in need. The error will equal the cost of services provided for the sample month or the portion of the month in which there was insufficient documentation, whichever is less.
<b>APMU 8.3</b>	If applicable, were the unpredictable hours of need updated at least every four (4) months (5 CCR, Section 18086(b)(2)(D))?	<b>Material:</b> If the unpredictable hours were not updated at least every four (4) months, an error will be determined as in 8.2. <b>File:</b> If the unpredictable hours were not updated at least every four (4) months, however the update was completed before the review month, an error will be determined in need.

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**NEED  
EMPLOYMENT**  
APMU 8.2

Per 18086(b)(2), contractors are to verify employment by doing one of the following:

- (A) Secure a written statement from the employer;
- (B) Telephone the employer and maintain a record, or
- (C) If the provided pay stubs indicate the total hours of employment and if the contractor is satisfied that the pay stubs have been issued by the employer, specify...the days and hours of employment to correlate with the total hours of employment and the parent's need.

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**NEED FOR SERVICES**  
APMU 8

- Self Employment  
APMU 8.6
- Seeking Employment  
APMU 8.11

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## VOCATIONAL TRAINING

### APMU 8.15

**TOM TORLAKSON**  
State Superintendent  
of Public Instruction

	Need - Vocational Training	Findings
<b>APMU 8.15</b>	Is the parent eligible for vocational training based on time limitations? (1) Six years from the initiation of services; <b>OR</b> (2) Twenty- four semester units or its equivalent after the attainment of a Bachelor's Degree (5 CCR, sections 18087[a][1] & [2] and 18087[b])?	<b>Material:</b> If the contractor certified services that exceed a vocational training limitation, an error will be determined in need. The error will equal the cost of services provided for the sample month or the portion of the month in which the family was ineligible, whichever is less.

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## NEED

## VOCATIONAL TRAINING

### APMU 8.16

**TOM TORLAKSON**  
State Superintendent  
of Public Instruction

General education does not equal vocational training.  
 General education is approvable when it is part of a vocational training program, e.g.,

1. When obtaining a GED is necessary to complete an apprenticeship program.
2. When completing ESL classes is necessary to complete community college course in early education (and there is written documentation from community college counselor verifying).

Simply stating a vocational goal does not transform a general education program into vocational training.

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## NEED FOR SERVICES

### APMU 8

**TOM TORLAKSON**  
State Superintendent  
of Public Instruction

- Parental Incapacitation  
[APMU 8.20](#)
- Child Protective Services  
[APMU 8.24](#)
- At Risk  
[APMU 8.25](#)
- Seeking Permanent Housing  
[APMU 8.26](#)

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**TOM TORLAKSON**  
State Superintendent  
of Public Instruction

## NOTICE OF ACTION APMU 9.1

	Notice of Action	Findings
<b>APMU 9.1</b>	Is the NOA complete, accurate and contain all CCR Title 5 components (5 CCR, Section 18094)?	<b>File:</b> If the NOA is not complete and/or accurate, an error will be determined in eligibility.
<b>APMU 9.2</b>	Was the NOA issued within 30 calendar days from the date the parent signed the Application for Services (5 CCR, Section 18118)?	<b>File:</b> If the contractor did not send out a NOA within 30 calendar days from the date the Application for Services was signed by the parent, an error will be determined in eligibility.
<b>APMU 9.3</b>	Did the contractor notify parents of due process requirements (5 CCR, Section 18120)?	<b>File:</b> If the contractor did not notify the parent of due process requirements, an error will be determined in eligibility.

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State Superintendent  
of Public Instruction

## NOTICE OF ACTION APMU 9.1

AP and CalWORKs programs require a certificate.

45CFR98.2 – “means a certificate (that may be a check or other disbursement) that is issued by the grantee directly to a parent who may use such certificate only as payment for child care services or a deposit for child care services... For purposes of this chapter, a child care certificate is assistance to the parent, not assistance to the provider.”

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State Superintendent  
of Public Instruction

## NOTICE OF ACTION APMU 9.1

AP and CalWORKs programs – the Notice of Action may be used as the certificate, if the Notice meets federal requirements.

1. Acceptable by providers as payment or deposit.
2. Indicates the parent’s level or amount of assistance.

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## ATTENDANCE APMU 10.1

Per Management Bulletin (MB) 14-04

As of July 1, 2014, child care providers authorized to provide subsidized child care services to families, are required to submit a monthly attendance record or invoices to the AP or CalWorks contractors. Contractors should define the term "broadly consistent" and must set and implement policies that detail the consequences for parents and/or providers who submit incomplete attendance records or invoices. Consequences may include, but are not limited to withholding reimbursement, terminating the business relationship with the provider, or terminating services to the family for continual violation of written policies.

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State Superintendent  
of Public Instruction

## ATTENDANCE APMU 10.1

	Attendance	Findings
<b>APMU 10.1</b>	Does the monthly attendance record or invoice contain the name of the child receiving services (Management Bulletin (MB) 14-04)?	<b>Material:</b> If the contractor did not set and implement policies outlining the consequences for parents and/or providers who submit incomplete attendance records or invoices, an error will be determined in need. The error will equal the cost of services provided for the sample month or the portion of the month which there was insufficient documentation, whichever is less.
	Does the monthly attendance record or invoice contain the specific date services were provided (MB 14-04)?	
	Does the monthly attendance record or invoice contain the signatures of both the provider and the parent at the end of each month, attesting under penalty of perjury, that the information provided on the attendance record or invoice is accurate (MB 14-04)?	
	Does the monthly attendance record/invoice contain the actual times the child entered and the time the child departed care for each day services were provided (MB 14-04)?	

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## ATTENDANCE APMU 10.2 – 10.5

	Attendance	Findings
<b>APMU 10.2</b>	For school age children, does the attendance record or invoice document the time when a school-age child departs for and returns from school during the day (MB 14-04)?	<b>Material:</b> If the contractor's authorized representative did not note the time when a school aged child departs and returns from school during the day, an error will be determined in provider reimbursement. The error amount will be determined as in 10.1.
<b>APMU 10.3</b>	If applicable, if the attendance record or invoice has issues that raise concerns that it was not filled out on a daily basis, does the contractor implement their policies (MB 14-04)?	<b>Material:</b> If the attendance record or invoice has issues that raise the concern that it was not filled out on a daily basis, and these issues were not addressed through policies adopted by the contractor, an error will be determined in need. The error amount will be determined as in 10.1.
<b>APMU 10.4</b>	If applicable, if the attendance record or invoice has non-operational days listed, did the contractor track to ensure that the provider has not exceeded the reimbursable 10 non-operational days (5 CCR, Section 18076 (b)(2), MB 14-04)?	<b>Material:</b> If the contractor did not set and implement policies outlining how the providers will report non-operational days and how they will track these days, an error will be determined in need. The error amount will be determined as in 10.1.
<b>APMU 10.5</b>	Does the attendance record broadly correspond with the certified hours of care indicated on the applicable Notice of Action or child-care certificate (5 CCR, sections 18074.1(a) and 18094(b)(5), MB 14-04)?	<b>Material:</b> If the attendance record or invoice is not broadly consistent (as defined by the contractor) and the contractor has not followed their written policy, an error will be determined in provider reimbursement. The error will equal the cost of the services provided for the sample month or the portion of the month in which the documentation of attendance/need did not correspond to the certified hours of care, whichever is less.

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## ATTENDANCE

Per Management Bulletin 14-04, agencies should develop and implement policies, including a definition of "broadly consistent" with clear and consistent consequences for program violations.

Attendance	Findings
<b>NOTE:</b> The attendance record should be reviewed in its totality before making a determination of a finding. The following issues may raise concern about the completion of the attendance record on a daily basis (time of arrival and departure)	
<b>Provider initials on a holiday</b> – A school-aged child is signed in/out of care by a provider on non school days.	
<b>Conflicting usage of two (2) providers</b> – Two (2) attendance sheets are present and each shows a child received care at the same time during a specific day in different facilities.	
<b>Provider not signing in/out a child for school</b> – The provider has not signed the school-aged child in/out of care on the attendance sheet on a scheduled school day.	
<b>NOTE:</b> The attendance record should NOT be sent back for corrections.	

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## Attendance – AP MB 14-04

AP Programs should examine attendance record to ensure that the child's time in/out at arrival and departure is documented on a daily basis and in line with the agencies definition of "Broadly Consistent" per Management Bulletin 14-04.

- Similar to 5-day notification, we won't always know when parent is documenting the time in/out as required, but sometimes we will know when they are not.
- APs must have policies to take appropriate enforcement steps with the responsible party.

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## Attendance – AP MB 14-04

Attendance Record or Invoice is a record of parents on-going need. If the record differs from approved hours, contact parent when it does not meet the agencies "broadly consistent" definition.

- Differs how? Consistent pattern indicating either:
  - Another ceiling might be appropriate.
  - The parent has changed employment/hours and not notified contractor.
- Changes are not one-time or temporary.

Attendance records will not coincide with approved hours of care every day but should meet the agencies "broadly consistent" definition.

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## COMMON ERRORS

- Calculation of income - Determining accurate frequency, such as weekly, twice per month, every other week, and monthly
- Not utilizing an income calculation worksheet
- Utilizing check stubs that do not precede the month of certification or checks are not consecutive.
- Excluding income that is not typical of the regular pay period, such as overtime, commissions, etc.
- Incomplete parental declarations
- Incomplete written referrals
- No case notes
- Not implementing written policies

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TOM TORLAKSON  
State Superintendent  
of Public Instruction

## QUESTIONS



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TOM TORLAKSON  
State Superintendent  
of Public Instruction

## CONTACT INFORMATION

Vanessa Saunders  
Alternative Payment Monitoring Unit Manager

[vsanders@cde.ca.gov](mailto:vsanders@cde.ca.gov)

Sandy Patitucci  
Southern Field Service Consultant

SPatituc@cde.ca.gov

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