



**Date:** 3/18/2020

**To:** County Human Service Directors. Please forward pertinent information on to staff members as you deem necessary.

**From:** The Division of Early Care and Learning (DECL)

**Regarding:** County flexibility within the Colorado Child Care Assistance Program (CCCAP) to address the impacts of the coronavirus 2019 (COVID-19) on local communities.

**Key Words:** DECL, CCCAP, Child Care Providers, CCCAP Families, County Policies, Coronavirus (COVID-19), Child Care Automated Tracking System (CHATS)

**Number:** IM-ECL-2020-0001

### Information Memorandum

**Information being conveyed:**

The Division of Early Care and Learning (DECL) understands that County Departments of Human Services are concerned about the impact that the coronavirus 2019 (COVID-19) may have on the administration of the Colorado Child Care Assistance Program (CCCAP) and the impact to CCCAP families and child care providers.

Counties can play an important role in helping to better prepare child care providers and support families during an emergency or after a disaster to help them quickly recover and care for children in a safe and effective manner. This includes ensuring continuity of care and services for families receiving assistance through CCCAP and for providers caring for children who receive subsidies. The DECL is encouraging County Departments to utilize local flexibilities in county administration of CCCAP and assess any temporary county policy changes that can be put into place to relieve burdens on CCCAP families and child care providers impacted by the COVID-19 virus.





## County Administration Flexibility

Due to the COVID-19 state of emergency declared by the Federal and State government, the State is strongly recommending the following temporary County Policy changes to support CCCAP families and providers:

- Provide reimbursement to providers for at least 14 paid absences per month OR provide reimbursement based on enrollment of the child not on attendance. This would include providers that are remaining open to care for children or providers that have had to close temporarily.
  - Reimbursement of additional absences can be accommodated by creating a new County Rate Plan and updating the number of absences paid per month in CHATS. CHATS will automatically pay out absences for authorized days to all licensed providers regardless of if they are open or temporarily closed (the most efficient option if the county is implementing the temporary change for all families and licensed child care providers).

If counties choose to manage payment of absences through the County Rate Plan, they must create a new County Rate Plan in CHATS. The effective date will automatically populate in CHATS for the first of the following month. If the county would like to back date the effective date of the new County Rate Plan to the first day of the current month, they must request to do so in the County Rate Plan Notes in CHATS and a data fix will be completed.

**OR**

Counties can choose to have providers submit manual claims for the additional absences.

- Reimbursement based on enrollment can be accommodated by creating a new County Rate Plan and updating the number of absences paid per month in CHATS. The county would want to consider significantly increasing the number of absences, up to 31 absences per month, to cover any unattended authorized care due to child absence or provider closure. CHATS will





automatically pay out absences for authorized days to all licensed providers regardless of if they are open or temporarily closed (the most efficient option if the county is implementing the temporary change for all families and licensed child care providers)

If counties choose to manage payment of absences through the County Rate Plan, they must create a new County Rate Plan in CHATS. The effective date will automatically populate in CHATS for the first of the following month. If the county would like to back date the effective date of the new County Rate Plan to the first day of the current month, they must request to do so in the County Rate Plan Notes in CHATS and a data fix will be completed.

**OR**

Counties can choose to have providers submit manual claims for reimbursement for all authorized days that were unattended.

- Approve providers to submit manual claims as needed for reimbursement of authorized care and allow additional time for submission.
- Waive parent fees/co-pays for families impacted by COVID-19 State emergency.
- Waive any requirements for face to face orientations or interviews and utilize the flexibility already included in CCCAP regulations to determine eligibility for families or to gather information from providers, such as:
  - Utilization of the PEAK system for families to submit an application
  - Utilization of electronic tools such as email or county portals for families or providers to submit any required paperwork
  - Utilization of information from other public assistance programs, such as the Colorado Benefit Management System (CBMS) to verify common eligibility verifications
  - Utilization of collateral contact to verify applicable eligibility requirements





- Utilization of Prudent Person Principle (PPP) on a cases by case basis in determining eligibility to include granting additional time for families to supply re-determination forms, required verifications or to report changes

9 CCR 2503-9

*“Prudent person principle” means allowing the child care worker the ability to exercise reasonable judgment in executing his/her responsibilities in determining CCCAP eligibility.*

*3.912 Z. Counties shall use the prudent person principle when determining eligibility or authorizing care and shall document reasoning in the appropriate notes section of CHATS.*

- Use the ability to extend job search periods for families who have lost employment to enable them to enroll in another eligible activity and to support continuity of care for children

Counties must document in CHATS via Case Comments or Provider Notes identifying COVID-19 State Emergency when:

- Applying approved temporary local level policy changes to child care cases
- Exercising the ability to use Prudent Person Principle when determining eligibility or authorizing care
- Counties are experiencing delays in the administration of CCCAP and are unable to meet processing guidelines as outlined in CCCAP regulations

Counties must submit an email outlining any temporary policy changes the county is requesting to make to the CCCAP Director, Tamara Schmidt at [tamara.schmidt@state.co.us](mailto:tamara.schmidt@state.co.us) for documentation, approval and tracking purposes.

### Funding Options

Counties have flexibility in the utilization of other funding sources to support CCCAP families and providers as follows:

- Funding options to support transfers from county TANF reserves to support over expenditures in CCCAP due to temporary county policy changes:





1. Counties may use TANF funds to address individual county over-expenditures in CCCAP or Child Welfare. Making these transfers is something that can be done at year-end during the closeout process.
  2. The State, as a whole, can transfer up to 30% of its annual TANF allocation each year to these two programs. The limits are up to 10% for Child Welfare with a 30% cap overall for both CCCAP and Child Welfare.
- Funding options to support transfers from county TANF reserves for “quality improvement activities,” to support child care providers:
    1. House Bill 17-1355 allows a county to use funds transferred under § 26-2-714(7), C.R.S. from its TANF/Colorado Works block grant for “quality improvement activities,” as identified in the Child Care and Development Block Grant Act of 2014, 42 U.S.C. § 9858e.
    2. The State, as a whole, can transfer up to 30% of its annual TANF allocation each year to these two programs. The limits are up to 10% for Child Welfare with a 30% cap overall for both CCCAP and Child Welfare.

Child care quality initiatives that could be relevant for an emergency request may include funds for necessary supplies or staffing in order to address additional standards or shortages related to COVID-19.

Counties may submit emergency requests for TANF transfer for quality expenditures through this form [\(link\)](#).

**Contact for questions regarding this Information Memorandum:**

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**Memo Website:** <https://sites.google.com/a/state.co.us/cdhs-memo-series/home>

