



NATIONAL CENTER ON

Subsidy Innovation and Accountability



Fiscal Year 2021 National Program Integrity Webinar Series

Webinar #1: Maintaining CCDF Program Integrity in a COVID-19 World

Dec. 8, 2020 – 3 p.m. ET

Call Logistics

- Welcome to our Adobe Connect webinar platform.
- This is an interactive session with breaks for dialogue.
- The slides are available for download in the Adobe pod labeled “Program Integrity Resources.”
- Phone lines are open to encourage dialog. **Please mute your phone.**
- If you would like to ask a question, “raise your hand” or type in questions and comments using the “Chat” boxes within the Adobe room.
- For Adobe Connect or registration issues please contact Heidi Freymiller at hfreymler@wrma.com.

Introductions

National Center on Subsidy Innovation and Accountability



Leigh Ann Bryan
Program Integrity
Manager



Jenna Broadway
Program Integrity
Specialist/SME



Michael McKenzie
Program Integrity
Specialist/SME

Welcome from the Office of Child Care

Moniquin Huggins

Director, Division of Oversight and Accountability



Agenda



- Program integrity - importance and benefits
- Common policy/process changes resulting from the COVID-19 pandemic
- Maintaining integrity as program changes occur
- Wisconsin presentation
- Resources available to assist agencies
- Wrap up and next steps

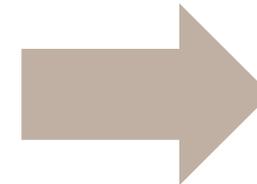
What is CCDF Program Integrity?

*A plan or system under which action may be taken toward a goal

*Firm adherence to a code of especially moral or artistic values; incorruptibility

Program Integrity

is the system or processes put in place to ensure a firm adherence to regulatory requirements of the CCDF program.



Doing the right thing even when no one is looking!

*Merriam-Webster Dictionary

Why is Program Integrity Important in CCDF?

- **E**nsure program and provider quality
- **T**axpayer dollars are spent appropriately
- **H**elp families to sustain employment and education to become self-sufficient
- **I**ncorporate internal controls that prevent fraud, waste, and abuse
- **C**onserve financial accountability
- **S**afeguard funds to maximize benefits for eligible children and families



Program Integrity Benefits



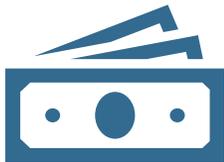
Correct eligibility determinations



Eligible children and families receive CCDF benefits



Providers meet federal and state CCDF participation requirements



Timely and accurate child care payments



Reduced improper payments



Deterrence tools for program fraud, waste, and abuse

Common Policy and Process Changes Resulting from the COVID-19 Pandemic

Pay based on enrollment

Support essential workers

Support PPE costs

Waive family co-payments

Grants to re-open provider sites

Waive fingerprint requirements

Definition of “working”

Incentive payments to provider staff

Common Policy and Process Changes: Supporting Providers

Pay providers based on enrollment rather than attendance

More flexible absence policies

- Helps providers remain open during periods of decreased enrollment
- Maintains spots for children as families return to work
- Provides much-needed stability to child care providers who accept children receiving subsidy



PI Tip: Ensure the provider/parent agreement is clear, documenting number of hours/days authorized and clearly defining enrollment.

Common Policy and Process Changes: Supporting Providers

Increase use of supply-building grants

- Promotes stability for providers and/or help to reopen
- Retains child care supply during periods of closure
- Incentives for providers serving children of essential workers



PI Tip: Double check effective dates and grant amounts for accuracy and keep in mind the deadlines for obligating and spending CARES Act funds. Establish a method for tracking where and how grant funds are used.

Common Policy and Process Changes: Supporting Providers

Provide additional provider payments to help with PPE costs

- Financial support to providers to comply with additional health and safety requirements resulting from the COVID-19 pandemic and related mandates
- Supports health and safety of providers and children



PI Tip: Require/request providers to have available upon request PPE purchase verification (receipts, invoices, etc.).

Common Policy and Process Changes: Supporting Providers

Waive Fingerprint Requirements

- Many fingerprint locations are closed and getting a child care background check has become a heavy burden
- Allows individuals to work with name-based clearances and reduces the wait time for staff to be hired and in place



PI Tip: Work with partner agencies to determine which checks can be done immediately to ensure safety of children.

Common Policy and Process Changes: Essential Workers

Prioritize care and waive income requirements

- Ease the burden for these families
- Offer providers incentives for serving children of essential workers
- Assures care for children of essential workers



PI Tip: Make sure there are system or manual checks in place to recognize the waived income requirements, especially if eligibility overrides are used. You'll need those records for audit purposes.

Common Policy and Process Changes: Family Income

Waive or reduce family co-payments

Increase income eligibility limits

- Relieve cost burdens on families who may otherwise have to drop out of child care
- Help providers maintain a steady stream of revenue and stay open to serve families



PI Tip: Develop clear guidance so eligibility workers can correctly determine what costs are waived and for how long.

Common Policy and Process Changes: Defining “Work”

Redefine “working” to include seeking employment, participating in community service, or a similar activity

- Eases employment requirements for accessing subsidies as unemployment climbs



PI Tip: Collaborate with your Workforce Agency to clearly define and communicate requirements for participating in these activities.

Let's Talk About It

- Have you implemented a policy or process change we have not mentioned? Tell us about it.
- Are there policies you've implemented in response to the pandemic that you will maintain?





Maintaining Program Integrity

Maintaining Integrity as Program Changes Occur



Pre-Implementation Analysis

Why?

- Why is this change needed?
- Why are we doing this now?
- Why is this change expected to have a successful outcome?

What?

- What is driving the change?
- What written documents need to be changed?
- What are the alternatives?
- What are the expected outcomes, including budget impacts?

When?

- When will this change be implemented?
- When will staff training occur?
- When will stakeholder participation occur?
- When will an assessment be conducted to ensure successful implementation?

Pre-Implementation Analysis, continued

Where?

- Where will this change be implemented?
- Where does the new policy need to be documented?
- Where are the opportunities to meet our mission or goals?
- Where is the data or evidence to support the success of the change?

Who?

- Who will be affected by this change?
- Who will develop/approve the policy or process?
- Who will evaluate and ensure accountability?

How?

- How will we communicate the change?
- How will staff be trained on the change?
- How will we implement the change?
- How was this successfully implemented elsewhere?

Post-Implementation: Policy and Process

Strategies for maintaining program integrity following implementation:



Apply relevant and responsive internal controls



Implement system edits and alerts



Conduct risk assessments



Enhance fraud oversight



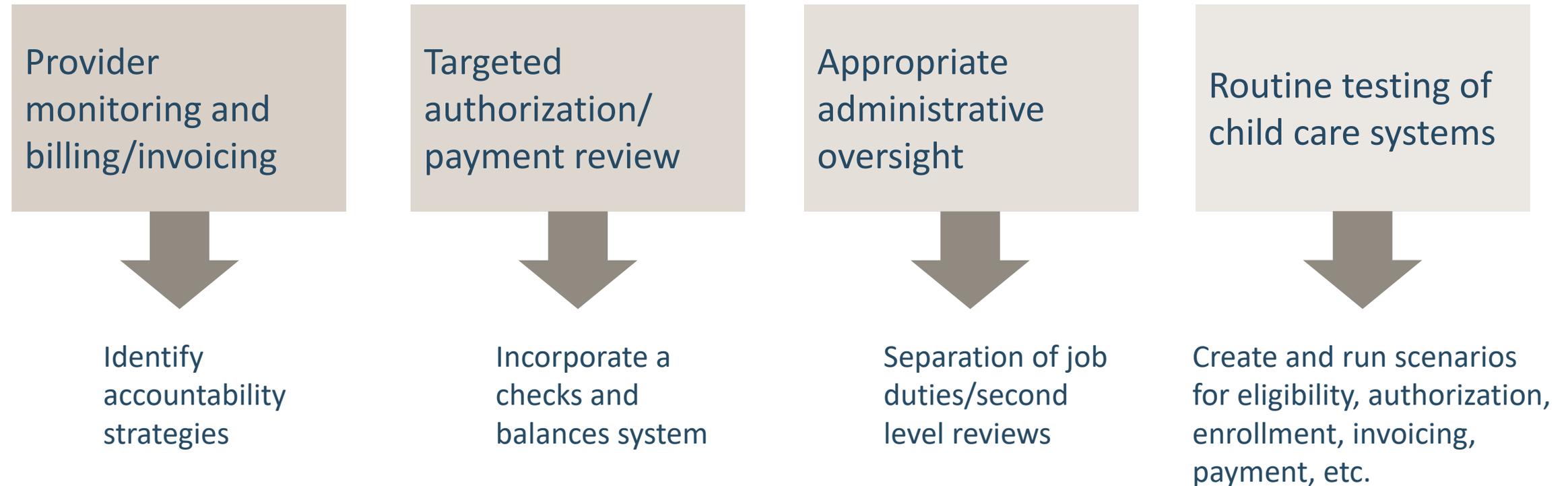
Coordinate and collaborate –
Be open to change



Ensure transparency

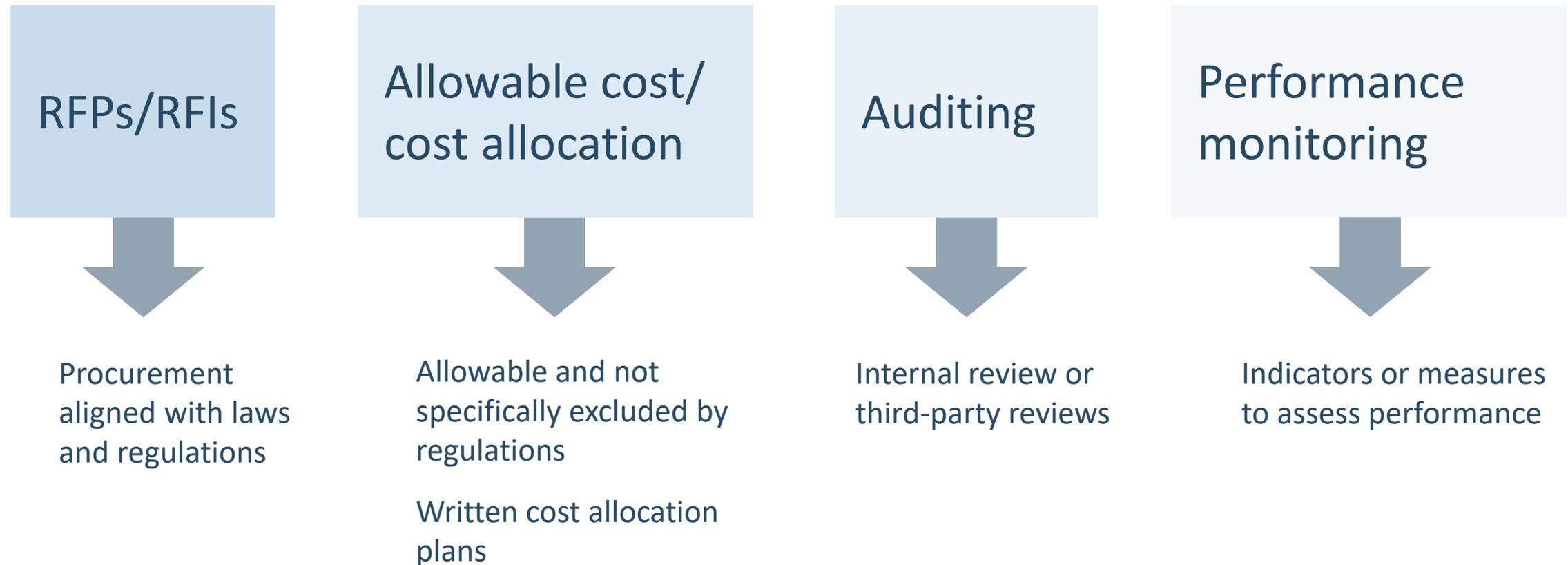
Post Implementation Strategies: Payment Accuracy

Payment review strategies for maintaining program integrity:



Maintaining Integrity: Contracts and Agreements

Program integrity strategies when implementing contracts and agreements:



Maintaining Integrity: Error Rate Reporting



Track changes to policies and processes

Accessible storage system
Clear revised dates
Update the RRW, as appropriate



Communicate and train staff on policy and process changes

Written memos/publications or e-learning
Email notifications
One-on-one training session



Conduct ongoing real-time case reviews

Targeted case reviews specific to policy or process changes
Identify training needs

Let's Talk About It

- Does your agency have a documented process when changes are needed?
- How does your agency monitor/evaluate program changes?





Wisconsin Department of Children and Families



Lead Agency Success Story

“

Throughout our public health emergency, Wisconsin has been a leader in prioritizing the needs of the early care and education community. We know *what's best for kids is best for our state, and we have to connect the dots by making sure our families have access to safe, affordable, and high-quality child care* so more people can remain in our workforce.

”

-WI Gov. Tony Evers

This is such a scary time for us providers. Afraid to get sick and be without pay and wondering if we go down if we can get things back up again.
Thank-you so much and stay healthy!



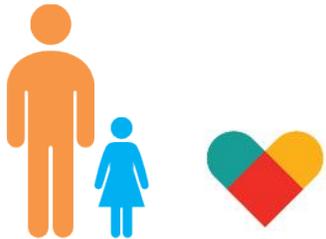
I am not sure to whom to send this, but THANK YOU very much!!!!

Honestly, without this help - we would have a great deal of trouble. We are all very grateful, because you are directly helping us save jobs and livelihoods, in addition to helping our children and their families.

Thank you again!



Thank you for believing in us! This help is so needed and we are so very thankful!!



Wisconsin's COVID-19 Response for Child Care Providers



Wisconsin Department of Children and Families

A look back at March



COVID named Public Health Emergency

Work from home

Schools closing

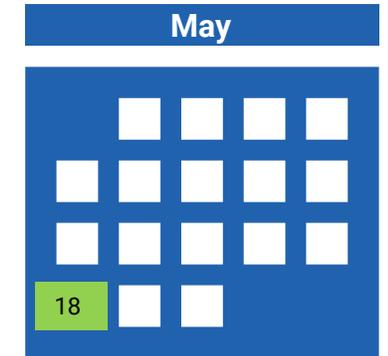
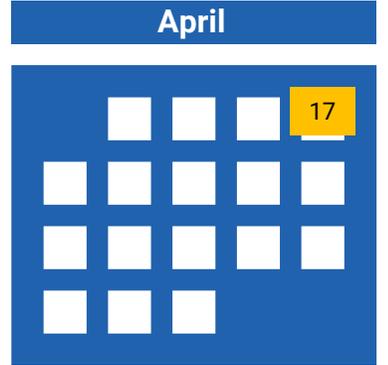
Child Care Providers closing



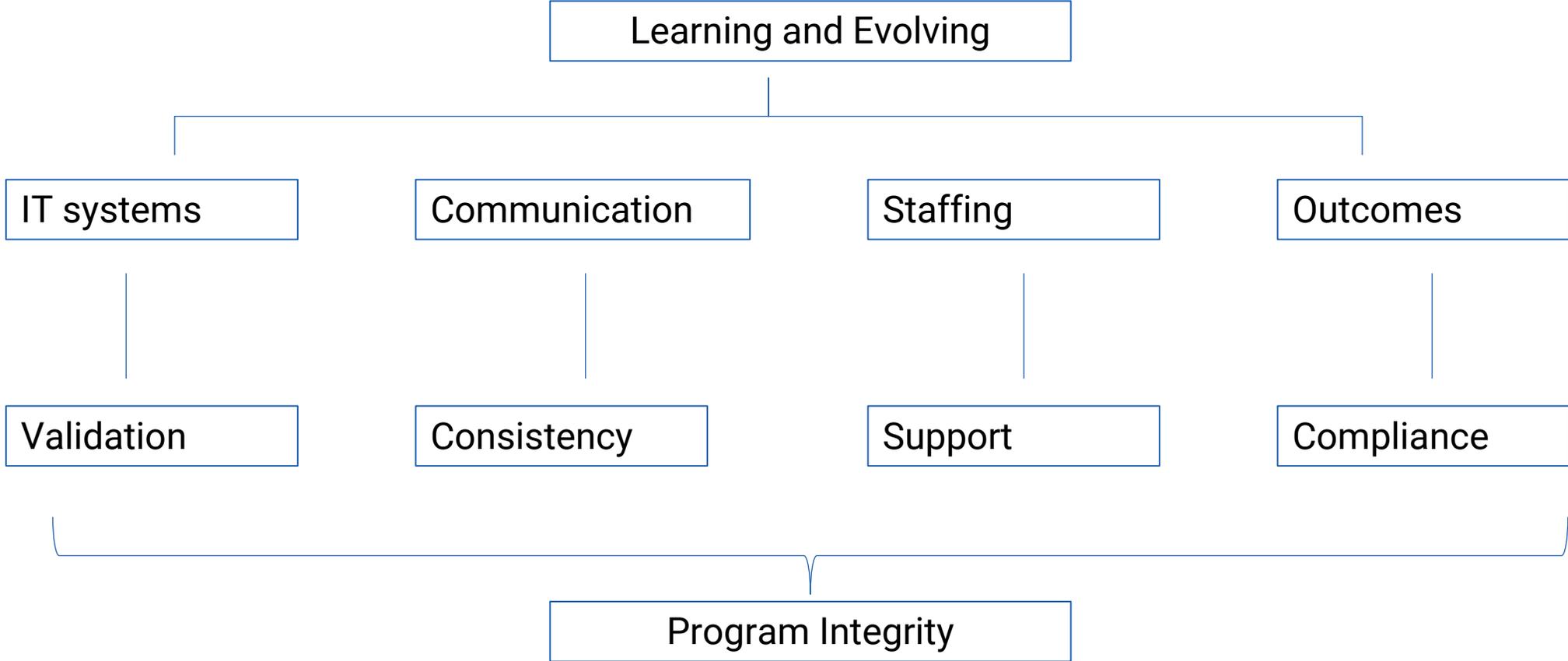
Essential workers
need child care



Matching with
available child care



Problem -----> Solution



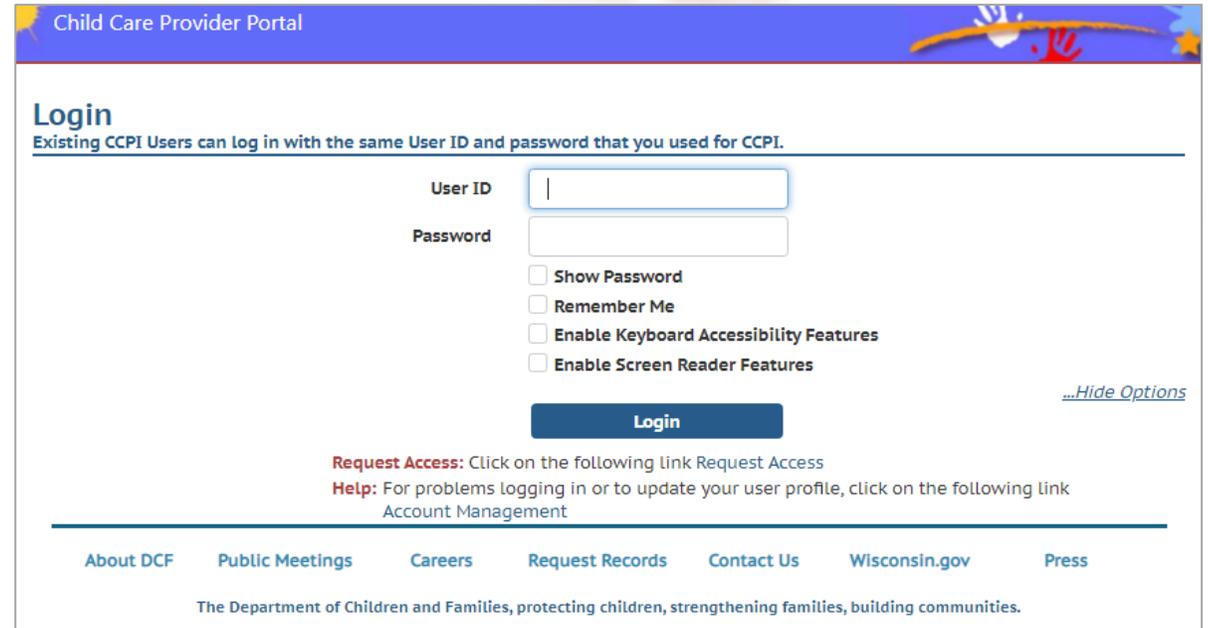
Figuring Out the Flight Plan

- Understanding Needs
 - Emergency Payment Program
 - Funding for Essential Workforce Families
 - Incentive Pay
 - Support for Temporarily Closed Programs
- Responding to Changing Needs
 - Supplementary Payment Program
 - Providing Safe, Healthy, and High Quality Child Care Opportunities
 - Funding Staff Recruitment and Retention Efforts



Application

Providers applied in Provider Portal, which they also use for complying with background check requirements



The screenshot shows the 'Child Care Provider Portal' login interface. At the top, there is a blue header with the text 'Child Care Provider Portal' and a decorative graphic of a sun and hands. Below the header, the page is titled 'Login' and includes the instruction: 'Existing CCPI Users can log in with the same User ID and password that you used for CCPI.' The login form contains two input fields: 'User ID' and 'Password'. To the right of the 'Password' field are four checkboxes: 'Show Password', 'Remember Me', 'Enable Keyboard Accessibility Features', and 'Enable Screen Reader Features'. A blue 'Login' button is positioned below these options. To the right of the button is a link that says '...Hide Options'. Below the login form, there are two lines of text: 'Request Access: Click on the following link Request Access' and 'Help: For problems logging in or to update your user profile, click on the following link Account Management'. At the bottom of the page, there is a navigation menu with links for 'About DCF', 'Public Meetings', 'Careers', 'Request Records', 'Contact Us', 'Wisconsin.gov', and 'Press'. Below the navigation menu is the text: 'The Department of Children and Families, protecting children, strengthening families, building communities.'



Wisconsin Department of Children and Families

Application

Call Center helped providers who did not or could not use Provider Portal.



Wisconsin Department of Children and Families

Application

Applications open for 2-week period

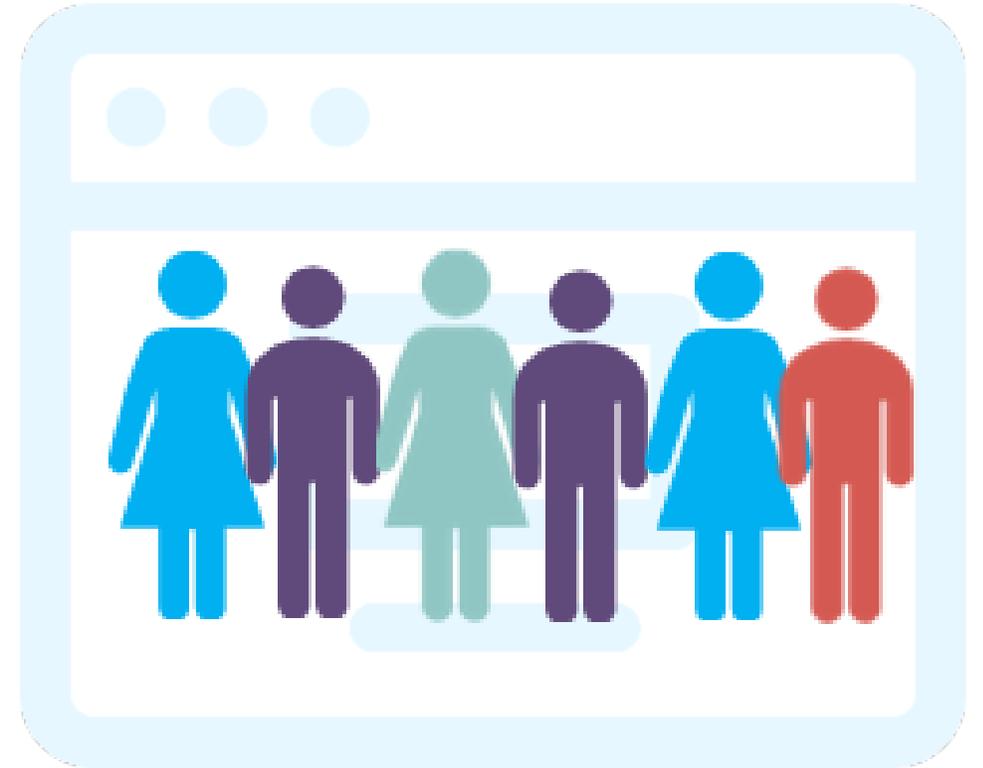


Wisconsin Department of Children and Families

Application

Application validations helped prevent inaccurate applications

- Checks for duplication of children
- Cross validations prior to submitting application (e.g., consistent answers, qualified to receive funds, appropriate open/closure period for program type)
- Showing application as 'Incomplete' until everything required as been entered.



Application

Application validations helped prevent inaccurate applications.

COVID-19 Payments – Add Application Details
Add common and payment program details for Providing Safe, Healthy, And High-Quality Child Care Opportunities

Grantee Details

Funding Period: Fall 2020

Grantee First Name *

Grantee Middle Initial

Grantee Last Name *

Grantee Email *

Grantee Phone *

Tell us if your program is opened or closed due to COVID-19

Was your facility open on 09/04/2020? * Yes No

Tell us about the children at your facility

Did your facility serve any children with disabilities? * Yes No ⓘ

Did your facility serve any children who speak languages other than English? * Yes No

Did your facility serve any children who are experiencing homelessness? * Yes No ⓘ

Did your facility serve any children from tribal communities? * Yes No

Did your facility serve any children living in rural areas? * Yes No ⓘ

Payment Program Details for Providing Safe, Healthy, And High-Quality Child Care Opportunities

Payment Program: Providing Safe, Healthy, And High-Quality Child Care Opportunities

Number of Children Enrolled * ⓘ

Enter the number of children enrolled on 09/04/2020 at this location.

Comments

Add



Wisconsin Department of Children and Families

Application

Application validations helped prevent inaccurate applications.

COVID-19 Payments – Add Child

Common Details

Funding Period: Fall 2020
Grantee Name: Ware, Ace H [More](#)

Child Details

First Name: Hack
Middle Initial:
Last Name: Saw
Date of Birth: 8/1/2019

Care Type: Full-time Care Part-time Care

Has disability?: Yes No ⓘ

Speaks language other than English?: Yes No

Experiencing homelessness?: Yes No ⓘ

Living in tribal community?: Yes No

Living in rural area?: Yes No ⓘ

WI Shares recipient during 8/30/2020 – 9/5/2020?: Yes No

Attend during 8/30/2020 – 9/5/2020?: Yes No ⓘ

Did the child attend at least one day between 8/30/2020 and 9/5/2020?

Comments:

Add



Wisconsin Department of Children and Families

Application

Application validations helped prevent inaccurate applications.

COVID-19 Payments - Staff

Add Staff

Common Details

Funding Period: Fall 2020
Grantee Name: Ware, Ace H

[...More](#)

Individual

Name: Ace Hardware
Employment Period: 2/18/2013

Staff Details

Care Type? This person typically works 21 or more hours per week at this location
 This person typically works 20 or fewer hours per week at this location

Is the individual on payroll at anytime between 8/30/2020 and 10/19/2020? Yes No

Comments

Add Staff

Staff List



Wisconsin Department of Children and Families

Calculation

Based on type of care (group or family)

Number of staff

Number of children

Periods being open or closed, and more

Program #1 Derived Amount Calculation		
Base Calculation		
Family Base	\$2,500	Base amount for family child care providers
Group Base	\$4,000	Base amount for group centers
Full time	\$150	Per child amount for full-time children
Part time	\$88	Per child amount for part-time children
Disability	\$25	Per child adjustment for each child with a disability
Off-Hours	\$25	Per child amount when provider serves during non-standard hours
Cap	\$25,000	Program maximum amount allowed
Percentage Adjustment		
	100%	
Post Percentage Adjustments		
Non-English	\$250	Program adjustment if any children speak non-English language
Homeless	\$250	Program adjustment if any children experiencing homelessness
Tribe	\$250	Program adjustment if any children from Tribe
Rural	\$250	Program adjustment if any children living in rural area
Original	\$10,380,858	
Re-derived	\$10,382,358	
	\$14,673,853	Re-derived total of all three programs



Calculation

Ensuring staff have eligible background checks to be counted



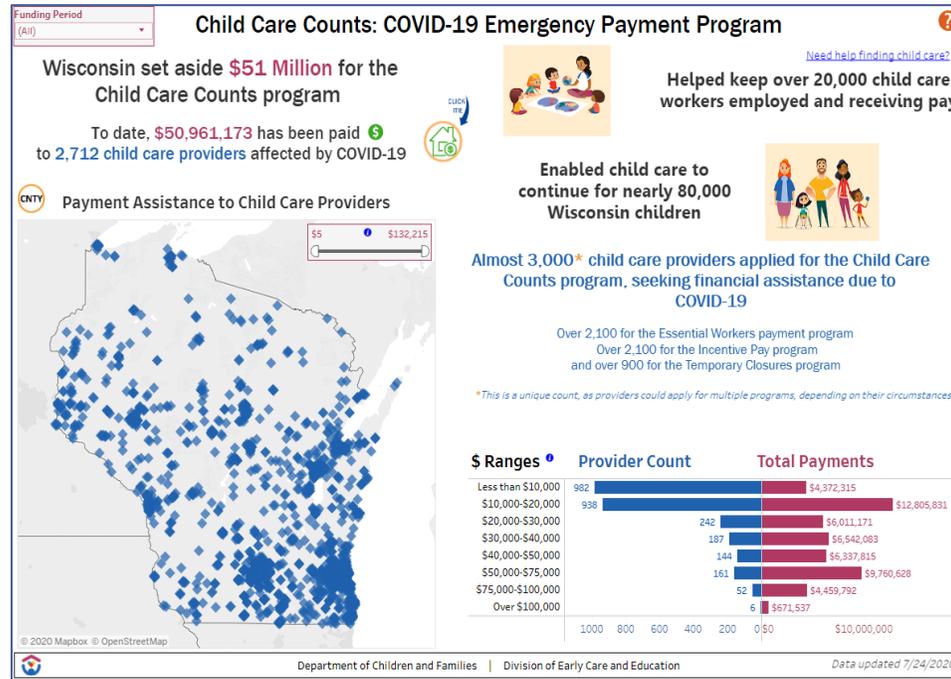
Calculation

Adjusted calculation parameters to
fit budget and keep fairness

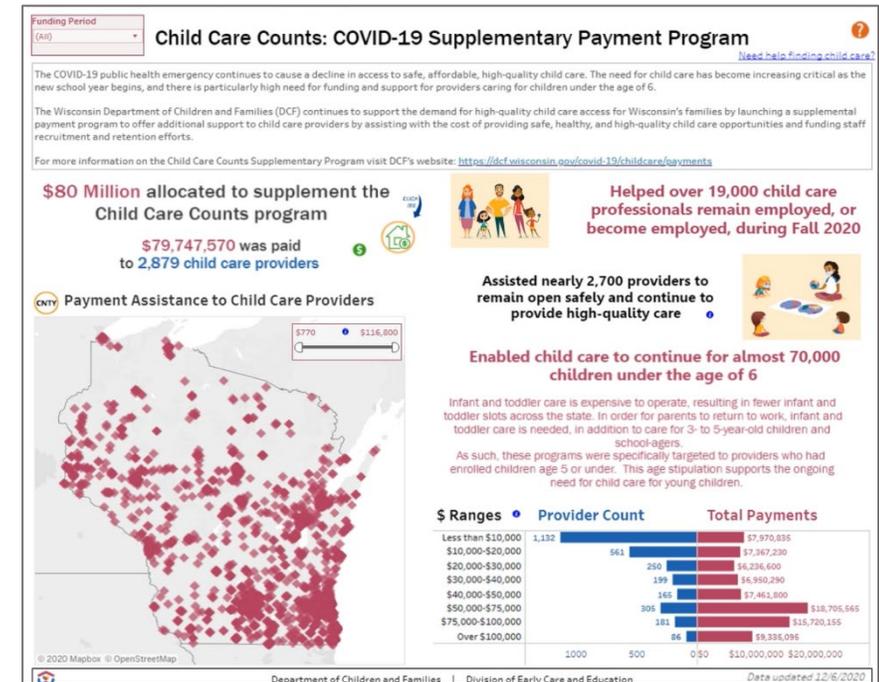


Reporting

Emergency Payments



Supplementary Payments



Staffing and Communications

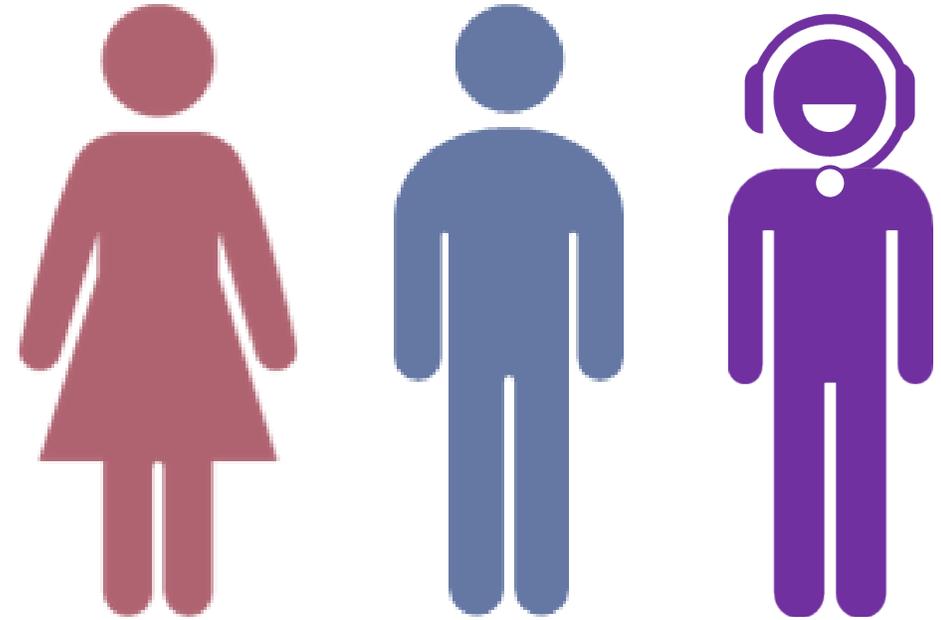
The Human Element

Staff and Training

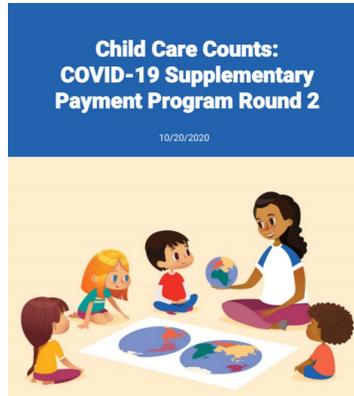
- DCF Staff Call Center
- External Partners

Communications

- DCF Staff
- External Partners
- Providers
- Parents
- Public



Call Center



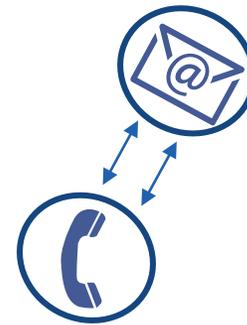
Read about the new Child Care Counts: Supplementary Payment Program.

The first (original) program is closed. Applications are no longer being accepted for the original program. The COVID-19 public health emergency has placed unprecedented stress on the child care sector which was operating on razor-thin margins by serving too many families, especially vulnerable families, without access to quality, affordable care.

A screenshot of a web form titled "COVID-19 Payments - Add Closure Schedule". It includes fields for "Funding Period", "Grantee Name", "From Date", "To Date", and a dropdown for "COVID-19 Closure Reason". There is a "Comments" text area and a "Add" button at the bottom.

Wisconsin set aside **\$51 Million** for the Child Care Counts Emergency program

To date, **\$50,850,863** has been paid to **2,712 child care providers** affected by COVID-19

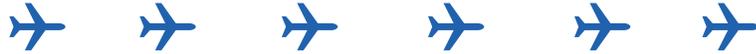


Wisconsin Department of Children and Families

Call Center-Results

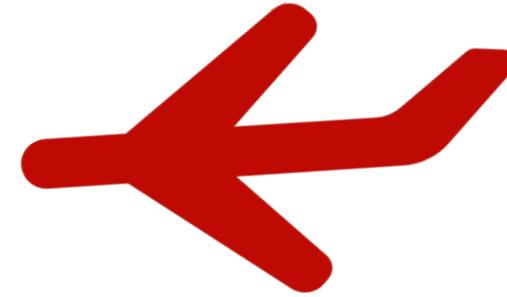


Essential workers
need child care



Child Care Providers
Need Support

~2,000 Inquiries



Wisconsin Department of Children and Families

Communications

Providers

- Child Care Listserv Messages
- Social Media
- Website
- Press Releases
- Direct Outreach
- Child Care Counts: COVID-19 Payment Program Manuals and Instruction Guides

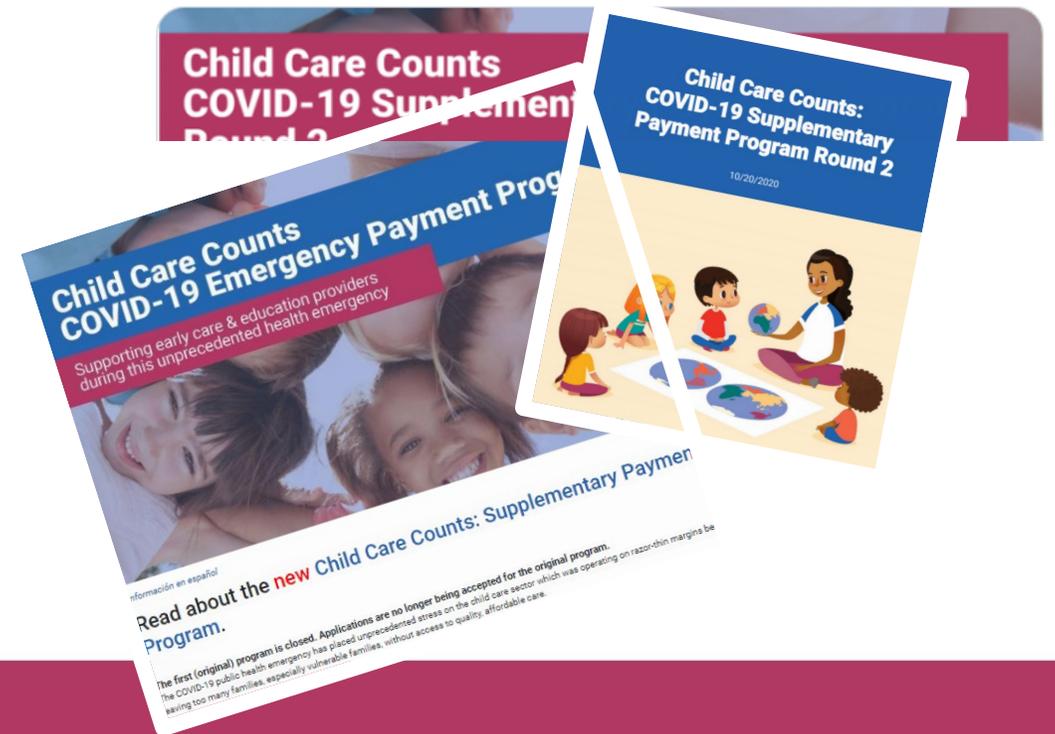
Public

- Press Release from Secretary's Office
- Social Media
- Website
- Dashboard



Wisconsin DCF @WisDCF · Oct 13

Today, @GovEvers & DCF Secretary Amundson announced another \$50 million in funding for an additional round of Child Care Counts payments for early care & education providers. Applications & program eligibility details will be available Oct 26. Learn more @ dcf.wisconsin.gov/covid-19/child...



Wisconsin Department of Children and Families

Conclusion – Success!!

Compliance demonstrated through audit and review

Continued enhancement as new needs arise.

Most Importantly – we have been able to support Early Care and Education Providers in Wisconsin!

\$130 Million

Nearly 3,000 Providers



Wisconsin Department of Children and Families



Outstanding Questions and Open Discussion

- This is your opportunity to ask questions of your peers.
- What strategies would you like to learn more about?



Resources

1. **AI/AN CCDF Guide to Financial Management, Grants Administration, and Program Accountability**
<https://childcareta.acf.hhs.gov/resource/american-indian-and-alaska-native-child-care-and-development-fund-guide-financial>
2. **AI/AN CCDF: Guide to Subsidy Administration for Medium- and Large-Allocation Grantees**
<https://childcareta.acf.hhs.gov/resource/american-indian-and-alaska-native-child-care-and-development-fund-guide-subsidy>
3. **CCDF Budget Calculator Instructions**
<https://childcareta.acf.hhs.gov/resource/ccdf-budget-calculator-instructions>
4. **CCDF Fraud Toolkit**
<https://childcareta.acf.hhs.gov/resource/ccdf-fraud-toolkit-and-instructions-0>
5. **Conducting CCDF Error Rate Reviews Remotely**
<https://childcareta.acf.hhs.gov/resource/conducting-ccdf-error-rate-reviews-remotely>
6. **Grantee Internal Controls Self-Assessment Instrument**
<https://childcareta.acf.hhs.gov/resource/grantee-internal-controls-self-assessment-instrument-0>

Resources

7. **Information Memorandum CCDF-ACF-IM-2020-01: CCDF Discretionary Funds Appropriated in the CARES Act (Public Law 116-136) passed into law on March 27, 2020**
https://www.acf.hhs.gov/sites/default/files/occ/ccdf_acf_im_2020_01.pdf
8. **National Center on Subsidy Innovation and Accountability Program Integrity Resources**
<https://childcareta.acf.hhs.gov/resource/ncsia-program-integrity-resources>
9. **National Center on Tribal Early Childhood Development**
<https://childcareta.acf.hhs.gov/centers/national-center-tribal-early-childhood-development>
10. **National Snapshot of State Agency Approaches to Child Care During the COVID-19 Pandemic**
<https://oig.hhs.gov/oas/reports/region7/72006092.pdf>
11. **Office of Child Care COVID-19 Resources**
<https://www.acf.hhs.gov/occ/resource/occ-covid-19-resources>
12. **Understanding the CARES Act: Supplemental Guidance for CCDF Lead Agencies on Spending, Maximizing, and Tracking Funds**
<https://childcareta.acf.hhs.gov/resource/understanding-cares-act-supplemental-guidance-ccdf-lead-agencies-spending-maximizing-and>

What's next? Save the date!!!

- Please be sure to complete the evaluation before you leave
- Program Integrity Webinar Series continues in FY 2021
- Please share your ideas for future presentations by email to Mike McKenzie (mmckenzie@wrma.com)



Next Webinar:
March 16, 2021
3 - 4:30 p.m. ET



NATIONAL CENTER ON

Subsidy Innovation and Accountability



Thank you!

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