



NATIONAL CENTER ON
Subsidy Innovation and Accountability



Error Rate Year 2 Cohort Call: Case Review Check-In and Frequently Asked Questions

October 1, 2020

Introductions

National Center on Subsidy Innovation and Accountability



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Introductions

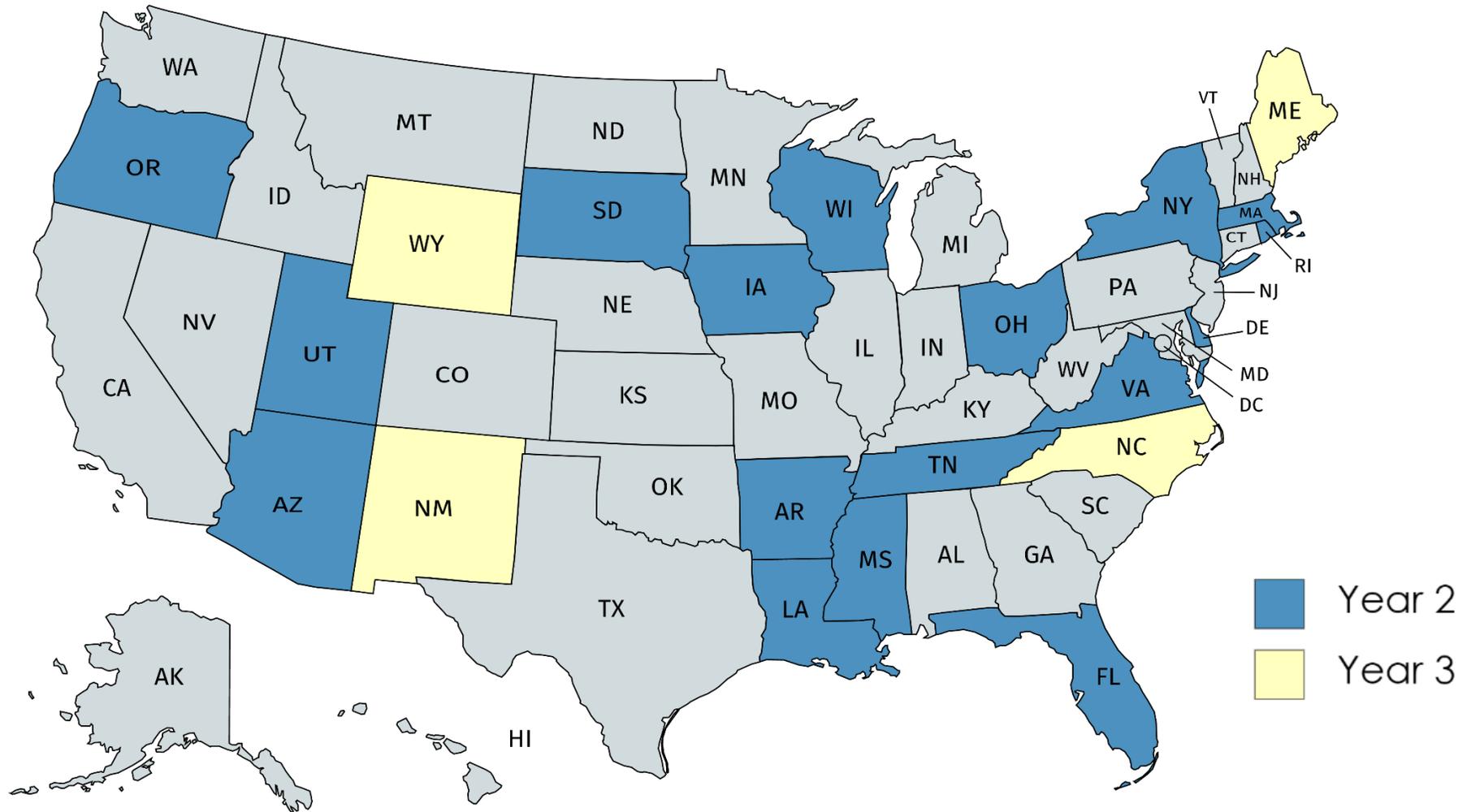
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ACF Regional Offices



Year 2 States



Agenda



- Frequently asked questions-sampling, reviews, funding, policy changes
- Logistical considerations for case reviews
- Other questions, challenges
- Completing the MID Table
- Next steps

Timeline for Year Two States

Year Two States

Case review period Oct. 1, 2019 – Sept. 30, 2020

Last day to submit *Sampling Decisions, Assurances, and Fieldwork Preparation Plan* Oct. 31, 2020

Last day to submit customized *Record Review Worksheet* Dec. 31, 2020

Last day to submit *State Improper Payments Report* June 30, 2021

Last day to submit *Corrective Action Plan* (if applicable) Within 60 days of the deadline for submitting the final report



Frequently Asked Questions

Considerations

States are at different points in the error rate review process.

Many states have made temporary policy changes through CCDF Plan amendments or approved waivers.

All scenarios discussed will depend on the state's current situation (i.e., state policies + any temporary changes).

Background

We have been getting many questions from state error rate staff about if/how the following cases should be included in the review:

- Cases paid for with CARES Act funds
- Emergency/Essential employee child care
- Cases where providers were not operating due to shutdowns, and/or children did not attend



Some considerations:

- Should the case be included in the sample?
- Does the reviewer need to do anything differently during the review?
- Is there an error?

Take a Step Back



What is our sampling unit?

- The sampling unit is a case (an individual child) that was **active** during the sample month, and for whom a subsidy payment was made for **services that were received by the child** during the sample month.

What do we mean by “active?”

- A subsidy for the child was authorized for the sample month.

What do we mean by “services that were received by the child?”

- Generally, we think of this as meaning that the child attended care.
- However, can also mean that the child was enrolled in care and payment was expected, regardless of child’s attendance.

Let's consider some scenarios

Scenario

1

Provider was closed due to COVID, child did not attend, provider was paid for child

Scenario

2

Provider was open, but child did not attend due to COVID, provider was paid for child

Scenario

3

Child attended different arrangement than usual due to COVID, both providers (emergency/open and closed) were paid

Let's consider some scenarios

Scenario

4

Provider was paid with CARES Act Funds

Scenario

5

Provider was paid with other emergency funds

- What was the funding source – CCDF, pooled with CCDF, different source?



Remember: Must be able to track *all* CCDF payments paid over 12-month period for the final report, including CARES Act funds

Policy Changes, Plan Amendments, Approved Waivers

How are these being accounted for in case review?

- **Examples:** temporary increases in income eligibility, waiving provider requirements, changes to 12-month eligibility for “emergency” child care

Should be addressed on RRW

- Include applicable time periods
- If anything needs to be changed after RRW is approved, submit revised RRW to Regional Office for approval



Reviewers should be knowledgeable of, and trained in all relevant policies, affected time periods, etc.



Logistical Considerations for Case Reviews

Logistical Considerations: The Basics

Review logistics vary from state to state.



Possible challenges:

- Local offices are closed
- Staff working remotely need to get physical files/ documents
- Reviewers in central location cannot (or do not want to) go into the field

Reviewers will need to access:

- Case record for child under review
- The *Record Review Worksheet* template

May also need to access:

- Eligibility, enrollment, and payment systems
- Other external data verification systems

Getting the Case Record



Where are records currently housed?

What is available electronically?

What is needed from other locations (e.g., local offices)?



- What is “normal” procedure to access these documents?
- What may need to be done differently this time?

Conducting Reviews Remotely

How many states will be conducting some or all the reviews remotely (i.e., from reviewers' home offices)?



Things to think about:

- Getting hard copies of case files, if applicable
- Connecting to state systems (some may be external to Lead Agency's system)
- Sharing completed RRWs
- Tracking status of reviews
- Keeping information secure

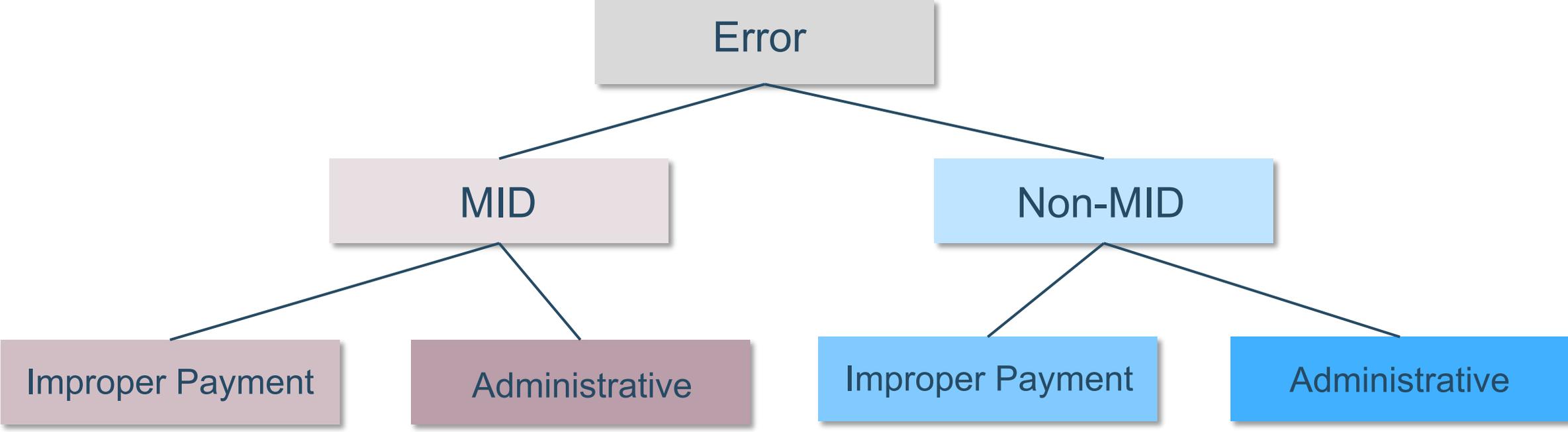
Other Questions? Challenges?





Completing the MID Table

Background: Error Types



The MID Table and Additional Inquiry focus only on Missing or Insufficient Documentation errors that may potentially cause an improper payment

What is the Additional Inquiry?

The Additional Inquiry (AI) may allow (for this review) mitigation of potential improper payment errors caused by missing or insufficient documentation.

- Through accessing **state resources** that are **not included in normal eligibility procedures**.

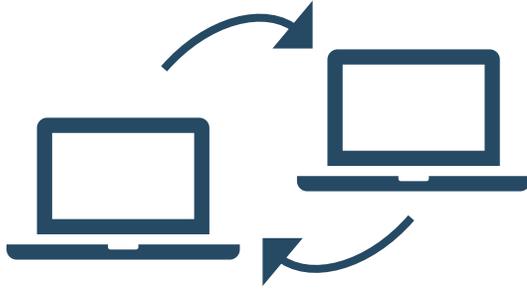


State resources - Agencies within the state, but outside of the Lead Agency (“Lead Agency” includes eligibility contractors here).

Not included in normal eligibility procedures - Workers do not access/consult with the resources while determining eligibility.

What is the Additional Inquiry?

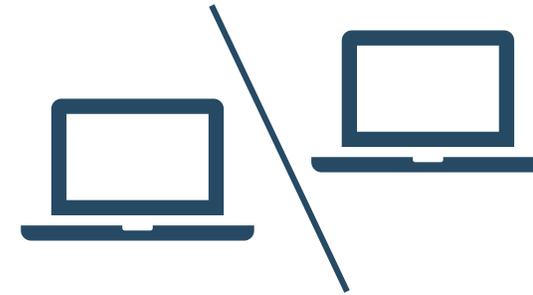
Example 1



State has shared systems with other assistance programs. Workers have access to system and are expected to use system in verifying requirements for eligibility determination.

- A reviewer could *not* use shared system for AI.

Example 2



State does not have shared systems with other assistance programs. Workers are not expected to reach out to other programs while verifying requirements.

- A reviewer could use other assistance programs' systems (if available) to conduct an AI.

What is the MID Table?

- The MID Table is part of the RRW to record information about *missing or insufficient documentation errors that may potentially result in an improper payment, regardless of whether an Additional Inquiry was used.*

Record Review Worksheet Missing and Insufficient Documentation Table (MID Table)

Child ID: _____

1	2	3	4	5	6	7	8	9
Element	Describe documentation that was missing or insufficient	Dollar amount of potential improper payment	Is there an additional inquiry that can be made to mitigate the potential improper payment error? 0=No 1=Yes	If No, describe why not <i>(Note: After responding, go to Element 500 if there are no other Elements requiring the MID Table)</i>	If Yes, describe the additional inquiry	Was the improper payment mitigated using the additional inquiry? 0=No 1=Yes	Enter dollar amount that was mitigated	Describe how the state determined whether or not the potential improper payment could be mitigated. <i>(Note: Please respond to this whether the potential improper payment was mitigated or not mitigated)</i>
100								
200								
300								
310								
320								
330								
340								
350								
400								
Total								

Example 1 – Administrative Error Only

While reviewing Element 100, the reviewer found that one of the pages from the application was blank.

The blank page meant some information was missing, but nothing that would make the case ineligible.

According to this state's policy, the blank page would not result in an improper payment.

The reviewer determined this was an error, but no improper payment (administrative error).

Do not complete the MID Table for this element.



Example 2 – Contacted Local Office

While reviewing Element 400, the reviewer found that the income information was missing from the case file.

The reviewer reached out to the local eligibility contractor, who was able to provide the missing information.

The reviewer determined this element had no error.

Do not complete the MID Table for this element.



Example 3 – Potential IP error, no AI

While reviewing Element 100, the reviewer found that the entire application was missing.

According to this state's policy, the missing application would result in an improper payment.

Since the application is unique to the Lead Agency, there is no AI that the reviewer could conduct.

Columns 2-5 of the MID Table should be completed for this element.



1	2	3	4	5	6	7	8	9
Element	Describe documentation that was missing or insufficient	Dollar amount of potential improper payment	Is there an additional inquiry that can be made to mitigate the potential improper payment error? 0=No 1=Yes	If No , describe why not <i>(Note: After responding, go to Element 500 if there are no other Elements requiring the MID Table)</i>	If Yes , describe additional inquiry	Was the improper payment mitigated using the additional inquiry? 0=No 1=Yes	Enter dollar amount that was mitigated	Describe how the state determined whether or not the potential improper payment could be mitigated. <i>(Note: Please respond to this whether the potential improper payment was mitigated or not mitigated)</i>
100	Missing application.	\$250	0	Application is unique to child care program.				
200								
300								
310								
320								
330								
340								
350								
400								
Total								

If there is an MID potential payment error, but no AI can be conducted, only complete columns 2-5 of the MID Table

Example 4 – Potential IP error, successful AI

While reviewing Element 400, the reviewer found that the income information was missing from the casefile.

The Lead Agency does not have shared screens with other programs.

The reviewer reached out to SNAP worker who provided missing information.

This is an Additional Inquiry.

This would be considered an error, no improper payment due to mitigation from the AI.

Complete columns 2-4 and 6-9 of the MID Table for this element.



1	2	3	4	5	6	7	8	9
Element	Describe documentation that was missing or insufficient	Dollar amount of potential improper payment	Is there an additional inquiry that can be made to mitigate the potential improper payment error? 0=No 1=Yes	If No, describe why not <i>(Note: After responding, go to Element 500 if there are no other Elements requiring the MID Table)</i>	If Yes, describe additional inquiry	Was the improper payment mitigated using the additional inquiry? 0=No 1=Yes	Enter dollar amount that was mitigated	Describe how the state determined whether or not the potential improper payment could be mitigated. <i>(Note: Please respond to this whether the potential improper payment was mitigated or not mitigated)</i>
100								
200								
300								
310								
320								
330								
340								
350								
400	Missing paystubs	\$250	1		Contacted SNAP worker	1	\$250	SNAP provided missing income information
Total								

Example 5 – Depends on State Policy

While reviewing Element 400, the reviewer found that the income information was missing from the casefile.

The Lead Agency has shared screens with other programs. Income information can be found.

Next steps will depend on state policy.

May consider this acceptable verification. Error because the verification wasn't physically in file, but no improper payment. **Do not complete the MID Table.**

May consider this acceptable verification and not an error at all. **Do not complete the MID Table.**

May consider the missing physical verification an improper payment regardless of whether the income is in the system. Reviewer could conduct AI using a different source. **Either way, complete the MID Table.**

To recap...



The MID table must be completed when:

- An error in an element is caused by missing and insufficient documentation, **and**
- Would result in an improper payment (according to state policy).
- Complete MID table whether or not AI was conducted.



The MID table is **not** completed for:

- Administrative errors
- MID that was mitigated “internally” by contacting local offices/eligibility contractors

Special MID Table Scenarios

More than one element has a MID potential payment error

Fill out MID Table for each applicable element



Ensure "Totals" row represents findings for case as a whole



Refer to handout or request TA

Multiple MID potential payment errors in one element

Add rows to the MID table, consider each error separately



Request TA

MID error is only partially mitigated

Request TA



Next Steps

Next Steps

Year Two States

- Submit SDAP (via OLDC) by October 31
- Submit RRW (email to Regional Office) by December 31



We can review drafts!

Case Reviews

- After you've started reviews, you can send us a few completed worksheets to make sure you're on the right track
- Joint case review: after ~70 cases/3 months of reviews are complete

Other TA Resources

NCSIA's error rate resources website contains links to past webinars and general information on the process:
<https://childcareta.acf.hhs.gov/resource/ccdf-error-rate-review-resources-0>

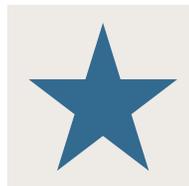


- February 19, 2020 webinar – creating SDAP and RRW
- February 18, 2020 –conducting case reviews
- January 9, 2019 – lots of info on AI

Reach out to your NCSIA error rate specialist for any TA.



- Help with submissions; review drafts of submissions
- Remote trainings
- One-on-one walkthroughs of “problem” cases and scenarios



Next webinar – Spring 2021

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Please copy your ACF Regional Office on any email correspondence.



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