

# November 2007 ELI Update Meetings

## Questions and Answers

- 1.If the child turns 6 in the summer but school doesn't start until the fall is the child still eligible?**

*Yes, the child is eligible until the day school starts in the fall.*

- 2.With the MOU a child could start in the ELI program as long as you have the MOU in place in the next 30 days?**

*Yes, an MOU shall be entered into between the CDJFS and the ELI contracted agency no later than 30 days following the date a child is authorized to attend the ELI program.*

- 3.What if they stop subsidized on a certain date within a pay cycle and then ELI starts the next day. Is that allowed?**

*The CDJFS can not begin the ELI authorization to the same provider until the first day of the next pay cycle if the subsidized care was authorized between 6 A.M. and 6 P.M. per 5101:2-23-03(I).*

- 4.If a child turns 3 in the middle of a pay cycle can they start ELI immediately?**

*If a child was not receiving subsidized care when they turned 3 years of age they can begin immediately. If the child was receiving subsidized care between 6 A.M. and 6 P.M. when they turned three the CDJFS can not begin the ELI authorization to the same provider until the first day of the next pay cycle per 5101:2-23-03(I).*

- 5.Would that be the same for kindergarten? When a child that begins kindergarten do they stay in ELI while attending kindergarten until the end of the pay cycle kindergarten started in?**

*A child becomes ineligible for ELI services the day that they begin attending kindergarten. To ensure no loss in the ability to receive care and/or reimbursement for care, the authorization for a child that will be attending kindergarten should stop at the end of the pay cycle prior to the pay cycle in which kindergarten begins.*

- 6.Who holds the CDJFS accountable for the timelines they are required to follow?**

The Bureau of Child Care and Development works with the CDJFS' and provides technical assistance on time lines, rules, etc.

- 7.Does anyone conduct performance measurements on CDJFS' or wait to get a phone call of complaint to see what they are doing?**

*The Bureau of Child Care and Development does perform reviews/monitoring visits on the CDJFS' as well as responds to complaints as they are received.*

**8. There seem to be delays or issues with the employment forms?**

*Concerns with delays or issues with employment forms should be addressed with the CDJFS.*

**9. When does the authorization start for determining the eligibility? An application is submitted on 11/01/07 and then the employment verification is submitted on 11/12/07. Can the child be authorized back to 11/01/07 or 11/12/07?**

*If the child was determined eligible, the authorization would begin 11/01/07.*

**10. Is it an accurate assumption/statement that you can submit 4 pay stubs if they are paid weekly, 2 if they are paid biweekly etc? As long as they get 30 days worth of income records?**

*Paragraph (B)(4)(b) of rule 5101:2-23-07 requires four weeks of pay stubs whenever possible.*

**11. An ELI application was turned in 8 weeks ago and the child was not authorized. Will the CDJFS create the authorization to begin 8 weeks ago?**

*If all required information was received within 15 days of the date the CDJFS received the application, the authorization may begin on the date the application was received by the CDJFS, if the child was determined eligible.*

**12. When does the 15 days start? Once that supporting documentation gets with the application or when the application was originally received?**

*There are two 15 day timeframes – The first 15 days would be that the family has 15 days from the day that they submit the application to submit income verification documentation to make the application complete. The 2<sup>nd</sup> 15 days begins for the CDJFS from the date the family submitted all necessary documentation including a completed application.*

**13. A family notifies the CDJFS they moved within 30 days and then the new CDJFS does not have to get a new application or anything?**

*The caretaker must contact the CDJFS in the new county of residence within 30 calendar days. The new CDJFS would communicate with the previous CDJFS to obtain the necessary information to transfer the child's authorization to the new county. The authorization end date and begin date should be made to coincide with the ELI pay cycles. The original county of residence would end their authorization at the end of an ELI pay cycle. The new county of residence would establish the authorization with the begin date of an ELI pay cycle through the end of the child's original 12 month authorization period. The child does not receive a new 12 month eligibility period due to the move.*

**14. Does the same apply for a child moving from one provider to another within the same CA? The CDJFS doesn't have to do anything such as have the family apply again?**

*The family does not have to apply again for 12 months once they have been determined eligible. The family does need to notify the CDJFS that they have changed providers/sites (in advance if possible) and the CDJFS shall end the authorization to the previous provider and create a new authorization to the new provider through the end of the child's original 12 month authorization period. The child does not receive a new 12 month eligibility period due to the move.*

**15. Should the JFS 1155 ELI Application be sent to the CSB or to the Lucas CDJFS?**

*The JFS 0115 ELI Application shall be submitted to the CDJFS to determine eligibility for a child.*

**16. If the CSB has a question about a child in custody can they ask the CDJFS and the contracted agency step out of the loop?**

*Yes, the CSB can discuss their questions with the CDJFS.*

**17. One of our providers has a program for teen moms that are still in high school. When you look at the income do you look at the teen mom's income or the parents of the teen because the teen lives at home who may or may not be working?**

*The parent's income would be used if the teen mom is not 18. If the teen mom is 18 or over, her income would be used.*

**18. We have a family that attended for one week and then stopped attending. We can not locate them to get signatures on the attendance records. When the monitoring occurs would we be required to have a signature on the records in this case? Would any billing submitted for this situation have to be removed?**

*A signature would be required and any billing submitted without signed attendance records shall be removed and/or refunded to ODJFS.*

**19. If a family was working and eligible for ELI but lost their job would they still be eligible?**

*Beginning July 2, 2007, there is no work requirement to be eligible for ELI. Once a child is determined eligible for ELI they are eligible for 12 months. There is not a 10 day reporting responsibility for ELI when there is a change in income or employment status.*

**20. We have a dollar a minute late fee because the center closes at 6 pm so staff having to stay over until a parent arrives – Can we charge the ELI families that fee?**

*No. ELI rule states the caretaker shall not be responsible for any fees to the ELI provider other than the applicable co-payment.*

**21.Can we charge for field trips that have both ELI children and subsidized children?**

*ELI providers cannot charge extra fees for any activities that take place during ELI program hours. Providers can charge for activities that the center offers to all children that are outside the ELI program hours.*

**22.Can the JFS 1155 ELI application be copied and handed out to providers to give to families when they want to apply for ELI?**

*Yes. ELI providers can provide ELI applications to individuals requesting an application.*

**23.If a caretaker changes facilities for childcare after the enrollment is paid to the first facility – does the 2<sup>nd</sup> facility get an enrollment award? What if the child is new within their allocation number?**

*If the child is changing from one Contracted Agency to another then an enrollment award would be paid to the new Contracted Agency as well. If the child is moving from one site to another under the same Contracted Agency that child is not considered unique and another enrollment award would not be paid.*

**24.Why did the payment rates change from weekly to per pay cycle?**

*This change in part, was driven by contracted agency input. This helps deal with the inconsistencies of attendance experienced by many contracted agencies.*

**25.How is ELI enrollment across the state? Will any new slots be opened up or awarded?**

*There are 12,000 slots available for the ELI program per fiscal year for this biennium and all have been allocated at this time.*

**26.Money is deposited by EFT but we no longer receive a “stub” – Why?**

*The new state payment system does not have anything in place to send out “stubs” at this time.*

*The state of Ohio made a decision to discontinue issuing paper remittance for Electronic Funds Transmittal (EFT) with the implementation of OAKS. Since the implementation, the State has received feedback that some banking institutions are unable to provide counties and local political entities with the complete payment information. In response to that feedback, a website to provide remittance information electronically was created through a partnership between the Office of Budget and Management (OBM), the Department of Administrative Services’ Office of Information Technology (OIT) and the Treasurer of State’s office. The*

application will be functional February 1 and can be found at <http://www.oaks.ohio.gov/remitlookup/>

*Users may query by date range, remitting agency, amount, invoice number, voucher number or payment ID. The data can be downloaded to an Excel spreadsheet and sorted. The data provided is for the period July 1, 2007 through the present. Up to twelve months of data will be available to view. The website is available to all users with an OAKS Vendor ID; however, it is being introduced first to county auditors and treasurers.*

*It is not mandatory for state agencies to populate the Payment Message field on a voucher.*

*E-mail questions to the above address or call (614) 644-5759*

**27.The provider needs more screening time when a child is not authorized in a timely manner.**

*Your comment has been forwarded to ODE. Screening concerns should be discussed with your ODE consultant.*

**28.Can we have the caretaker sign the attendance records at the beginning of the pay cycle so that we have their signature covered?**

*No. A caretakers signature shall be obtained after the attendance has occurred. The signature is verifying the accuracy of the attendance shown on each attendance record.*

**29.Do we need to report to the CDJFS when a caretaker does not pay their co-pays? We have been advised that this is not the CDJFS' responsibility.**

*Delinquent co-payments are to be reported to the CDJFS' per rule 5101: 2-23-05 (H).*

**30.Is the amount we are reimbursed effected when we collect co-payments?**

*No. The co-payment is in addition to the reimbursement you receive.*

**31.I have set it up to have an auditor come out but if you are not looking at any fiscal records do I still need to have the auditor? I also included this requirement in my subcontracts.**

*ODJFS does not review fiscal records other than those included in the course of an ELI monitoring visit (e.g., payment promptness, attendance documentation, etc).*

**32.To transfer an ELI eligible child from one agency to another agency, what is the time frame that a child will be authorized to attend the new ELI site?**

*This is not defined in rule. Refer to MOU to address this situation.*

**33.If the signature is not legible can she print her name beside the signature? Or should I keep on hand a document that has their name and that they attest that this is their signature so that you can verify against that to know that person.**

*Either of these options would be acceptable but every attempt should be made for them to sign legibly.*

**34.From one fiscal year to the next, will a child that attended this fiscal year be considered new for enrollment dollars?**

*With the beginning of a new fiscal year and new purchase order all children will be considered “new” to your agency and enrollment awards would be issued.*

**35.If a child moves from one site to another what do I do with them?**

*The family does need to notify the CDJFS that they have changed providers/sites (when possible in advance of the change in sites) and the CDJFS shall end the authorization to the previous provider and create a new authorization to the new provider through the end of the child’s original 12 month authorization period. The child does not receive a new 12 month eligibility period due to the move. The Contracted Agency should not submit billing for a child when they are authorized to the wrong site.*

**36.Is foster parents income used in determining eligibility?**

*Yes, the foster parent is considered the caretaker and their income would be used.*

**37.Foster parents are now eligible for their foster child to be in ELI. Does the child need to be approved for OWF funding?**

*No, the child could receive OWF funding. The foster parents would have to be eligible based on family income.*

**38.Unearned income – does that include funds that parents or family might provide?**

*Yes, if caretaker reports “assistance” received.*

**39. What if a child does not have a social security number?**

*A child is not eligible for ELI unless they have a social security number.*

**40.Can a child be eligible for Federal Head Start and ELI at the same time? During different hours of the day of course.**

*The ELI program is intended to be full-time full year to meet the needs of the family. In a situation described, the ELI provider is responsible to determine how to most appropriately bill for each program.*

**41. Who is informed (caretaker, contracted agency, provider) when a CDJFS does not have a completed application? (i.e. they need more verification)**

*Some CDJFS' may follow up with the caretaker but there is no rule requiring the CDJFS to do so.*

**42. Since you are not monitoring on this, will the expenditures be reviewed by anyone because they are TANF funds?**

*If you are referring to the previous administrative cap, then no, monitoring of expenditures will not be conducted by ODJFS. We cannot predict what may be reviewed in the course of an audit conducted by ODE, AOS, or any other entity.*

**43. Is there a pay cycle that we have to have used our slots by to avoid having them taken away and reallocated to another agency?**

*At this time there is no plan to reallocate slots.*

**44. How strict is the confidentiality issue? The agencies aren't willing to share the status of an application when asked and the reason given is breach of confidentiality.**

*Once a CDJFS has received the signed JFS 01155 ELI Application they have the release of information and should be able to share the status of an application.*

**45. Is there a chance that advanced technology might be developed for Kinderattend, so we are not doing so much data entry – i.e. parent swipe card.**

*Not for the Kinderattend system that we currently have in place.*

**46. Can ELI funds be spent on medical screenings?**

*As ODJFS considers ELI providers as vendors, use of money received for Providing ELI services is at the sole discretion of the provider.*

**47. Does the ODJFS list of providers also include ODE licensed sites?**

*Yes, all ELI providers are included on the ELI provider list.*

**48. How far back can an overpayment go?**

*Rule 5101:2-16-71.1 effective July 1, 2006 states ELI overpayments shall be recovered from either the caretaker or provider.*

**49. Since the ELI attendance and subsidized records need to be kept separate, do I need to have a copy of both from my providers?**

*No. The records need to be separated so when monitoring is completed on the attendance records, ELI attendance hours will match the hours that were billed.*

**50. What pay cycles will be reviewed in the monitoring visits?**

*The monitoring visits shall cover all exported pay cycles of SFY 08 at the time of your agency's visit.*

**51. Does the child ID need to be included on the supporting documentation provided to the providers with their payments?**

*No, the child's name is sufficient.*

**52. When will the correct amounts billed on Kinderattend be the accurate amount billed?**

*The correct amounts are available on the web site at this time.*

**53. Can a CDJFS only authorize all children in a family to the same program if for example, one child doesn't qualify for ELI due to age, then the CDJFS won't authorize the sibling that is age eligible to ELI either – they make them all be in the same program.**

*No, the caretaker makes the request for services they want their children to receive.*

**54. Is it correct that new kids have their authorization end dates at the end of June instead of 12 months out?**

*Once a child is determined eligible, they are eligible for 12 months that may begin with the date the CDJFS received their application. The CDJFS can chose to end an authorization 12 months to the day, at the end of the co-payment cycle calendar or at the end of the month.*

**55. Regarding the 6AM to 6PM rule in the same pay cycle, what if the CDJFS is not on the same cycle as ELI?**

*The rule refers to the ELI pay cycle.*

**56. Can only the parent unroll a child from Kindergarten, not the KG teacher?**

*Yes. ORC 3321.01 states a child under 6 enrolled in kindergarten shall be considered "of compulsory school age" unless at the parent's or guardian's discretion and in consultation with the child's teacher and principal, formally withdraws the child from kindergarten.*

**57. If payment arrangements have been made on a delinquent co-pay, does the contracted agency still have to report it to the CDJFS?**

*Paragraph (H) of rule 5101:2-23-05 requires that when the copayment is delinquent more than ten calendar days, the ELI provider shall submit a record of delinquent copayments to the CDJFS, no later than fifteen calendar days from the last date of the ELI copayment calendar month.*

**58. What happens after the contracted agency notifies the CDJFS of a delinquent co-pay?**

*If the caretaker fails to enter into a repayment agreement with the provider, the CDJFS will propose to terminate ELI services. If the caretaker enters into a repayment agreement, the child would remain eligible to receive ELI services.*

**59. Who collects or pursues the delinquent co-pay?**

*The ELI provider collects co-pays. If a repayment agreement is offered and the caretaker refuses to enter into an agreement or fails to comply with a signed agreement, then the CDJFS will propose to terminate ELI services.*

**60. If they have a delinquent co-pay in subsidized can they receive ELI?  
How about the opposite?**

*A delinquent co-payment effects only the program the co-pay is for. If a caretaker has a delinquent co-pay in ELI, they are eligible to receive subsidized child care and vice versa.*

**61. What's the earliest a 2 year old (soon to be 3) can apply for the ELI program?**

*A caretaker may apply within thirty days of the child's third birthday.*

**62. We have public preschool and ELI that aren't year round – we do registration in the spring for the fall – so does the families eligibility begin in the spring or not until the fall?**

*A family shall apply within thirty-days of the time the child will begin ELI services, and eligibility will begin when the caretaker requests to begin the services.*

**63. CDJFS are authorizing kids to both within the same pay cycle and within 6-6 (a child turns 3 in the middle of a pay cycle) what happens then? Overpayment – who is at fault? Who repays?**

*Paragraph (I) of rule 5101:2-23-03 requires that the CDJFS shall not authorize ELI for a child who is authorized for subsidized child care at the same provider between the hours of six a.m. and six p.m. in the same pay cycle. The CDJFS shall determine if the overpayment is to be recovered from the ELI contracted agency or from the family.*

**64. Can children be in both ELI and public preschool?**

*Yes*

**65. Are special needs children in a half day program eligible for ELI?**

*Yes*

**66. If a child is on an IEP in preschool can that child get ELI services as well?**

*Yes, as long as it is public preschool.*

**67. Can a child receive ELI services and Federal Head Start services from the same provider?**

*Yes. There is nothing in the ELI contract nor Chapter 23 of the OAC that prevents a child from receiving both ELI services and Federal Head Start Services. It is the provider's responsibility to bill appropriately.*

**68. If a child is in public preschool can we bill ELI for the time they are at the center prior to public preschool hours each day and after preschool hours each day?**

*Yes*

**69. We are making less money than last year with the rule changes. What is being done to correct that?**

*Many contracted agencies are billing their average pay cycle amount or above their average. You may be able to serve additional children if you are under utilizing your dollars.*

**70. We have a 2 week withdrawal notice that we have of all families. Can we charge a withdrawal fee to an ELI family if they decide to not come?**

*No. ELI rule states the caretaker shall not be responsible for any fees to the ELI provider other than the applicable co-payment.*

**71. Does the payment system prevent billing subsidized and ELI in a pay cycle.**

*No, the state issues ELI payments and the CDJFS issues subsidized payments. They are two different payment systems.*

**72. Will we get instructions on the web site/reports – the things you went over and showed us how to use them?**

*There have been previously issued instructions on how to group children and establish user ID's. Contact your ELI consultant if you want additional information on Kinderattend instructions.*

**73. How does the ELI contracted agency know the application date?**

*If they know the date the CDJFS received the application.*

**74. How does the ELI contracted agency know when the application was fully completed with income documentation?**

*The CDJFS is only required to notify the caretaker and contracted agency of the child's eligibility or ineligibility.*

**75. Can a co-pay be increased once a child is authorized?**

*No, a co-pay cannot increase once eligibility has been determined.. A co-pay can decrease if the caretaker has a change in income and reports the change to the CDJFS.*

**76. If the authorization dates are inaccurate, authorizations are not for 12 months, and you make the CDJFS aware and it is not corrected, then what?**

*The ELI contracted agency should work with county administration regarding problems with county staff performance.*

**77. If the contracted agencies cannot get response/action from the CDJFS – correct information, change it, complete eligibility etc. who should they contact? They have contacted County Directors already to no avail.**

*They can contact their ELI consultant or staff with the Bureau of Child Care and Development.*

**78. Is it required practice for a CDJFS to require parents to complete both an ELI packet and regular child care packet? Can the CDJFS require it?**

*The family is responsible for completing the application identified for the services they are requesting.*

**79. If a child is ELI eligible but the CDJFS has the center and family complete an ELI request form, how many days does the CDJFS have to put the center request in the 3299?**

*In accordance with paragraph (J) of rule 5101:2-23-03, the CDJFS shall enter data, online or upload, into the “Child Care Information Data System” (CCIDS/3299) for children determined eligible or ineligible for ELI services , using pay source code 173, no later than five business days following the date the CDJFS determines eligibility or ineligibility, unless otherwise approved by ODJFS.*

**80. The parents are not coming to pick up their kids until after the program has ended for the day. Can we charge a late pickup fee?**

*No. ELI rule states the caretaker shall not be responsible for any fees to the ELI provider other than the applicable co-payment.*