



Pat Quinn, Governor

Michelle R. B. Saddler, Secretary

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Memorandum

Date: July 18, 2012
To: CCR&R Directors and CCAP Managers/Staff; Providers; Child Care Bureau Staff
From: Gina Ruther, Acting Child Care Bureau Chief *Gina Ruther*
RE: Clarification Regarding CCAP Policy 06.03.01 – 80% Attendance Rule

It has come to our attention that there is confusion in the field around the status of CCAP Policy 06.03.01 – 80% Attendance Rule. The questions we are getting, among others, include: Is this policy changed or eliminated? Why do we now have to do additional paperwork?

Please be advised, **the 80% Attendance Rule (CCAP Policy 06.03.01) has NOT changed. Both Site and Certificate Providers can continue to use this policy!**

We think some of the confusion may be coming from our May and June conference calls, in which we discussed strategies for providers who **consistently** bill whole centers or caseloads at 100% attendance. For your clarification and for you all **to be the ambassadors of clarity for CCAP** with your providers, here is a recap of the discussion about providers who **consistently** bill at 100% attendance:

- You, the eligibility and payment staff, have the right to request further documentation when practices send up a red flag, such as providers **consistently** billing whole centers/caseloads or a substantial number at 100% attendance. Please note the emphasis on “consistently.” As we discussed in our calls, no further action is probably needed for occasional/one-time 100% attendance billing or for an individual child/case billed at 100% for a month.
- Even for the one-time/occasional providers that are billing a whole center/caseload at 100% attendance, a phone call or email to them noting this practice and what they should be doing differently is warranted, as a part of your technical assistance to providers. What they should be doing: recording/reporting **actual** attendance and eligible days for each child.
- The further documentation you would request, if warranted, would be the sign in/out sheets from the provider. This may be after a few months of 100% attendance billing. In conjunction with the request for this additional information, as hopefully with ALL requests for additional information, you will again give the provider an explanation of why you are requesting this and what they should be doing differently (noting **actual** attended and eligible days).

Our discussions of this in May/June were **in no way** meant to imply that you should begin to request/demand these documents from providers en masse. This would be overly burdensome on providers, is not reasonable, and may cause us to lose providers unnecessarily.

So I implore you to review your current practices in light of this clarification and make sure no wrong impressions or worse, wrong information is being distributed from your "shop."

Thank you and as always, contact me if you have questions.

Just a few reminders concerning the policy – excerpts from 06.03.01.

Policy Statement:

Payments for licensed and license-exempt child care centers are based on eligible days if the total of days attended for all IDHS children at the center location are 80% of the eligible days.

Payments for licensed child care home providers are based on eligible days if the total of days attended for all children in the family are 80% of the family's eligible days.

Payments for license-exempt child care home providers are based only on attended days.

Applicability:

This policy is applicable to site administered providers and certificate providers.

Definitions:

Eligible Days - The number of days a child is approved for child care assistance each month relative to the parent's employment and/or education/training schedule. The number of eligible days must not exceed the maximum number of days the provider is open for business during the month.

Attended Days - The number of days a child is present during the month.

Location - The physical location of the day care center; street address.

Procedures:

I. Day Care Center

Under no circumstances shall a child be lined off of the Certificate or SAMER¹ because of low attendance to manipulate the result of the 80% attendance rule.

In order for the rate type (full time, part time, or school age) to be included in the 80% calculation, a child must attend at least 1 day in the rate type in order for the eligible days to be paid.

II. Licensed Day Care Home and Licensed Group Home

III. Special Instructions for School Age Children

If the certificate is returned to the CCR&R for payment processing and the provider has indicated full time attendance, the provider must indicate the date(s) and reason for full time attendance (i.e. 1/21/02, Martin Luther King's birthday).

IV. Changes to Eligible Days

Eligible days are based on the parent's (or parents') work schedules. Changes should not be made to the eligible days unless the parent has a documented change in their work or school schedule except under the following conditions:

- A. Vacations/Illness (Licensed child care centers only)
- B. Provider Closures (All licensed providers and license exempt centers)

To view the full policy, go to <http://www.dhs.state.il.us/page.aspx?item=10862>.

¹ Site Administered Monthly Attendance Report – for DHS contracted providers.