

# CDD.1060: Reporting Changes

**Category:** Child Care Financial Assistance Program

**Authority:** 33 V.S.A. § 3512

**Last revised date:** 08/02/2024

**Effective date:** 02/14/2025

## Overview

The purpose of this policy is to ensure consistent practice statewide within the Child Care Financial Assistance Program (CCFAP) when changes are reported by a primary caretaker during their 12 month eligibility period.

## Updates

This document has been updated to reflect the following changes:

1. Removal of section C.4(a)(iii) and the option of a split file for new applicants.
2. Expansion of the timeframe to change a file status reflecting a change in income from 'one service period (two weeks)' to 'two service periods (at least 4 weeks)' in section A.3 and D.2(a)(ii)(2).
3. Reorganization of section A.4

All changes are highlighted in gray below.

## Policy

The primary caretaker is responsible for reporting non-temporary changes that may affect their eligibility during their 12-month eligibility period within 10 business days of the change occurring. Changes include, but are **not** limited to:

1. Changes in household size or composition;
2. Marital status;
3. Employment or training status;
4. Address; or
5. Income.

Only reported changes during the 12-month eligibility period that would benefit a family either with a decreased family share or an increase in authorized childcare hours are processed, however, the household's income **must** be within the income guidelines for their household size and gross monthly income to remain eligible for CCFAP.

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# Procedure

## A. Case Management

1. If during the 12-month eligibility period the primary caretaker reports a change or provides documentation that would result in a decrease of family share or an increase in hours authorized for childcare (benefits the family), the Eligibility Specialist **must** redetermine the application in CDDIS to capture these changes.
  - a. A reported change that decreases Family Share is effective at the beginning of the service period in which verification is received.
  - b. The only documentation required is the documentation needed to verify the change they are reporting.
2. If during the 12-month eligibility period the primary caretaker reports a change or provides documentation that would increase the family share or decrease the authorized hours of childcare, the Eligibility Specialist does **not** redetermine the application.
  - a. The family share amount and hours remain the same as previously determined during the 12-month eligibility period.
  - b. The Eligibility Specialist will enter a case comment in CDDIS about the reported change and confirmation that the family remains on the income eligibility scale for their household size and gross monthly income.
3. If the family is no longer income eligible due to the reported change, assistance will end **two full service periods (at least four weeks' notice)** from the date the change is processed.
4. If a family is no longer eligible due to moving out of state, the Eligibility Specialist will verify with the primary caretaker if notice was given to the provider.
  - a. If notice was given, all certificates will end the Saturday at the end of the week of last attendance.
  - b. If two weeks' notice was **not** given, the Eligibility Specialist will request two weeks' of no notice payment if no notice was given or one week of no notice payment if one week of notice was given.
  - c. **The Eligibility Specialist will end certificates the Saturday at the end of the week of the applicable no notice payment period.**
5. A temporary change is defined as a change in eligible activities and/or income for a defined period of time.
  - a. Reduction in work or training/educational activity
  - b. A time limited absence from work
  - c. Interruption of work for seasonal workers

- d. Interruption of education due to semester or holiday breaks
  - e. Cessation of work or attendance at a training or education program that does **not** exceed three months.
  - f. An increase of income that does **not** exceed three months.
6. The primary caretaker is **not** required to report a temporary change to their Eligibility Specialist. The family share will remain the same during the temporary change unless documentation is provided that shows a change in income or hours which benefits the family.

## **B. Employment, Self-Employment or Education/Training**

1. If a primary caretaker or other adult household member reports they have a non-temporary change in employment, self-employment, education, or training, the Eligibility Specialist will inform them they may utilize the service period of Seeking Employment for a period of 3 months.
2. The Eligibility Specialist will send a Seeking Employment Plan to the primary caretaker, allowing 10 days for return. The Eligibility Specialist will inform the primary caretaker and their family that the form is required for the removal of job income, to change their current service need to seeking employment and to issue certificates for 3 months.
3. The Eligibility Specialist will redetermine the file to change the service need and remove the applicable income upon return of the Seeking Employment Plan.
  - a. If the Seeking Employment Plan form is **not** returned, then employment or self-employment income is **not** removed.
4. If the form is **not** returned, the Eligibility Specialist will call the primary caretaker to confirm that they still require child care and assist them in completing the process.
5. If all attempts to contact the primary caretaker fail, the Eligibility Specialist will continue to change the service need to seeking employment, create the certificate(s) for 3 months and continue with attempts to contact the primary caretaker and family.
6. If after 3 months, the primary caretaker or other family member does **not** have a service need or has **not** responded to the attempts to contact, the Eligibility Specialist may close the file.
7. If at any time during the 3 months the primary caretaker or other household member reports they are now employed, self-employed, have returned to school, or are temporarily incapacitated (maternity leave, injury, etc.) the Eligibility Specialist will request forms necessary to determine service need.

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- a. Once the forms are received, the Eligibility Specialist will redetermine the file to reflect the new service need but will **not** enter new income information.
- b. The original eligibility / authorization end date remains the same.
- c. The family share amount and certificate hours **must** remain the same unless the information provided benefits the family.

## C. Household Composition

### 1. Marriage/Other Biological Parent in Household.

- a. The primary caretaker reports they will be or are now married or the other biological parent is in the household. The following options are available to the primary caretaker:
  - i. The current child care financial assistance 12 month authorization remains the same and the spouse or other biological parent and children are **not** added to the current authorization and they are **not** allowed to apply independently.
    1. At redetermination, the spouse/other biological parent and children **must** be listed on the application.
    2. The Eligibility Specialist will note this in case comments in CDDIS.
  - ii. The primary caretaker may add their spouse or other biological parent and children to the household.
    1. A new application and supporting documentation **must** be submitted within 10 days of the reported change.
    2. The Eligibility Specialist will process the application and render a new 12 month authorization and certificates provided the family is eligible.
    3. The Eligibility Specialist will add a case comment in CDDIS indicating the family composition has changed and the primary caretaker has requested the addition of their spouse and, if applicable, additional children.

### 2. Separation.

- a. The primary caretaker reports they are now separated from their spouse or other biological parent. The following options are available to the primary caretaker:

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- i. The current child care financial assistance 12 month authorization remains the same and the spouse remains as a household member.
    1. At redetermination, the spouse/other biological parent is removed as household members if they are still no longer in the household.
    2. The Eligibility Specialist will note this in case comments in CDDIS.
  - ii. The primary caretaker requests their spouse or other biological parent and any children who are no longer in the household be removed from their household composition.
    1. A new application and supporting documentation **must** be submitted within 10 days of the reported change.
    2. The Eligibility Specialist will process the application and render a new 12 month authorization and certificates provided the family remains eligible.
    3. The Eligibility Specialist will notify the primary caretaker that proof of legal separation or child support will be required at redetermination in order to determine eligibility and note this in CDDIS case comments.
3. Adding a new child to a single caretaker household
- a. The primary caretaker reports a new child in the single caretaker household, the following options apply:
    - i. The current 12 month authorization remains the same and the new child is **not** added until the annual redetermination.
      1. The Eligibility Specialist will note this change and primary caretakers request to wait until redetermination to add the child to the household in CDDIS case comments.
    - ii. The primary caretaker requests to add the new child to their single caretaker household.
      1. The primary caretaker **must** complete a new application and submit with supporting documentation including child support information.
      2. The Eligibility Specialist will process the application. A new 12 month authorization and certificates will be created for all children in the household if the family remains eligible.

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3. When adding a new child, the new child **must** receive a full three months of seeking employment eligibility if a parent reapplies with the service need of seeking employment. If the parent was utilizing seeking employment for the other child(ren) in the household prior to reapplying, the new seeking employment end date for the existing children will align with the seeking employment end date for the new child. This may result in a longer period of job search for the existing child(ren).
4. Adding a new child and second caretaker to household
  - a. The primary caretaker reports a new child and second caretaker in the household, the following scenarios apply:
    - i. The current 12 month authorization remains the same and the new child and second caretaker are **not** added until redetermination.
      1. The Eligibility Specialist will note this change and the primary caretakers request to wait until redetermination to add the child and second caretaker to the household in CDDIS case comments.
    - ii. The primary caretaker requests to add the new child and second caretaker to the household.
      1. The primary caretaker **must** submit a new application and supporting documentation.
      2. The Eligibility Specialist will process the application. A new 12 month authorization and certificates will be created for all children in the household if the family remains eligible.
      3. When adding a new child, the new child **must** receive a full three months of seeking employment eligibility if a parent reapplies with the service need of seeking employment. If the parent was utilizing seeking employment for the other child(ren) in the household prior to reapplying, the new seeking employment end date for the existing children will align with the seeking employment end date for the new child. This may result in a longer period of job search for the existing child(ren).
    - ~~iii. If the second caretaker is in the household and child care is needed for the new child and the second caretaker is **not** the caretaker of the other children in the household, the primary caretaker and second caretaker can choose to either apply as together or have two split files.~~

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- ~~1. The primary caretaker and the second caretaker **must** both submit an application and supporting documentation.~~
  - ~~2. The Eligibility Specialist will process both applications and render 12 month authorizations and certificates for both caretaker(s) provided they are eligible.~~
- iv. **Exception:** A new application is **not** required to add a new child to a Family Support Child Care (FSCC) application. The Eligibility Specialist will redetermine the original application to add the new child, maintaining the original FSCC authorization end date.

## D. General

1. Increase in Service Need Hours
  - a. The primary caretaker reports an increase in service need hours for either themselves or the second caretaker.
    - i. Documentation to support the reported change **must** be submitted to make the change in service need hours.
    - ii. *Example:* New paystubs or an employment verification form for an increase in employment hours, a new class schedule or letter for the training program or a new signed and completed adult with special health needs form.
      1. If an employment verification form is submitted to reflect an increase in service need hours, and the follow up pay stubs that are received do **not** validate the information on the employment verification form, the service need hours for the primary or secondary caretaker are reverted back to the hours in place prior to the employment verification form being submitted.
    - iii. The Eligibility Specialist will redetermine the application on file to increase the authorized hours and leave the income the same unless the change benefits the family.
    - iv. The Eligibility Specialist will inform the primary caretaker that new income amounts will be added at redetermination.
2. Increase in Income.
  - a. The primary caretaker reports a non-temporary increase in income.
    - i. The Eligibility Specialist will inform the primary caretaker that documentation to support the reported change **must** be submitted to determine if the household's income is still within the income

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guidelines for their household size and gross monthly income to remain eligible for CCFAP.

- ii. After documentation to support the reported change is received, the Eligibility Specialist will manually recalculate the household's gross monthly income.

1. If the increase in income does **not** exceed the income guidelines for their household size and gross monthly income, the Eligibility Specialist will inform the primary caretaker that their current family share will remain the same until their redetermination, new income amounts will be added at redetermination, and their family share may increase. The Eligibility Specialist enters a case comment to reflect this information.

2. If the increase in income causes the family to exceed the income guidelines for their household size and gross monthly income, the Eligibility Specialist will redetermine the application to create a denial letter with the effective date **two full service periods (at least four weeks' notice)** from the date the change is processed.

3. Request to Reopen File.

- a. If a primary caretaker requests for their file to be closed, they **must** be allowed to reopen within their original 12 month eligibility period.

- i. *Example:* If a child is authorized for May 2024 to May 2025 and the primary caretaker requests to close their file in September 2024, if they later request care for January 2025, they **must** be allowed to access the original authorization that is valid until May 2025.

- b. A new application with supporting documentation is **not** needed, however, the Eligibility Specialist **must** ask the primary caretaker if they have any changes to report that would impact eligibility and document the conversation in case comments. If changes are reported that would impact eligibility, follow the applicable guidance in the Reporting Changes policy.