

Child Care Financial Assistance Program: Program Integrity for Child Care Providers

Child Development Division
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Topics Covered

- What is Program Integrity?
- CDD Program Integrity Responsibilities
- Child Care Provider Responsibilities
- CCFAP Program Violations
- Violation Outcomes
- Technical Assistance



What is Program Integrity?

- Processes put in place to ensure compliance with Child Care Financial Assistance Program (CCFAP) rules and regulations
- Preventing and identifying program violations
- Training providers on program requirements and policy changes
- Helps to ensure that state and federal funding is properly spent.

Having program integrity is doing the right thing even when no one may be looking!

CDD Program Integrity Responsibilities

What program integrity responsibilities does the Child Development Division have?

- Have program integrity policies and procedures in place that are clearly defined
- Train providers on program requirements
- Identify program violations and fraud
- Investigate complaints
- Recover improper payments
- Impose sanctions on CCFAP recipients or providers in response to fraud
- Collaborate with child care licensing.

Child Care Provider Responsibilities

- Providers must have a current, signed Provider Rate Agreement (PRA) on file to receive CCFAP payments
 - A new PRA is required every three years
 - Signing the PRA includes agreeing to the [CCFAP Provider Responsibilities](#).
- Review CDD email communications for updates to [CCFAP Provider Training Materials](#)

Child Care Provider Responsibilities

- Properly submit attendance reports to receive accurate CCFAP payments.
 - Refer to training materials on [Attendance Reports](#)
- Report changes to the child's assigned Eligibility Specialist at the local [Community Child Care Support Agency](#) including:
 - When a child eligible for CCFAP is no longer enrolled
 - When a child from an eligible family is absent for more than three unexplained or unexcused days of care

CCFAP Program Violations

A program violation is when a provider “breaks the rules” of the program, regardless of whether they are unintentional (accidental) or intentional (fraud). A program violation can result in an overpayment of Child Care Financial Assistance Program funds.



Types of Program Violations

Intentional (Fraud)

A provider intentionally withheld, concealed, or misrepresented information to receive or to attempt to receive payments to which they were not entitled, or to help another person receive child care financial assistance to which that person was not entitled.

- Examples:
 - Collusion between families and providers (splitting subsidy payments)
 - Submitting claims for children not in attendance

Unintentional (Accidental)

A provider accidentally withheld, concealed, or misrepresented information due to not understanding CCFAP policies or regulations.

- Examples:
 - Using the wrong attendance code due to lack of understanding, and there is no history of previous code violations
 - A provider fails to report to the Eligibility Specialist that a child is no longer attending.

Common CCFAP Violations

- **Inaccurate Attendance Submitted** – Attendance records submitted in CDDIS must match attendance records kept on file at the program, showing when children were in attendance.
- **Inaccurate Use of Attendance Codes** – Providers are expected to use [approved attendance codes](#) when children are not in attendance on a day they are regularly scheduled to attend or the provider is closed.
- **Not Reporting Changes to Eligibility Specialists** – Providers are expected to report when children are no longer attending their program and notice that an active certificate is still showing on their attendance in CDDIS.

Improper Payments

What is an improper payment?

When payment is made to a provider on behalf of a family that was more or less than what should have been paid.

What happens when an improper payment is made?

CDD investigates and recoups improper payments when a violation occurs. Improper payments can be recouped from the parent or provider, depending on who committed the program violation. Recoupments can be paid back in full or through a payment plan. For providers, recoupments may be deducted from future CCFAP payments.

CDD does not recoup improper payments due to eligibility determination errors.

In cases of improper payments that were less than what should have been paid, the original payment is recouped and the correct payment is made to the provider.

Sanctions

- Sanctions may be placed on providers and families to help reduce improper payments due to intentional program violations or fraud. Sanctions may include:
 - Disqualification of a client or provider from CCFAP participation
 - Referral to the Vermont Attorney General's Office for criminal prosecution.
 - Intercept of payments from other State of Vermont agencies
 - Tax intercept

Child Care Licensing and Child Care Financial Assistance Collaboration

Licensing Violations Can Lead to CCFAP Consequences

Payment received while a provider was not in compliance with the following licensing regulations may be considered an overpayment. These include:

- Maximum number of children
- Allowed staff: child ratio
- Care outside of regulated operating hours
- Care provided at a location other than the authorized location

Program Integrity Technical Assistance

- Technical assistance can be requested by the provider, or provided because of a questionable CCFAP claim review or a program integrity complaint
- Program integrity staff can provide technical assistance in person, over the telephone, or via email
- A technical assistance visit can either be announced or unannounced
- Technical assistance is intended to be educational and not punitive.

Questions?

If you have questions, please reach out to the Program Integrity staff at the Child Care Financial Assistance Program Unit at the Child Development Division

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