

3. Provide Stable Child Care Financial Assistance to Families

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In providing child care assistance to families, Lead Agencies are required to implement these policies and procedures: a minimum 12-month eligibility and redetermination period, a process to account for irregular fluctuations in earnings, a policy ensuring that families' work schedules are not disrupted by program requirements, policies to provide for a job search of no fewer than 3 months if the Lead Agency exercises the option to discontinue assistance, and policies for the graduated phase-out of assistance. In addition, the Lead Agency is also required to describe procedures for the enrollment of children experiencing homelessness and, if applicable, children in foster care.

Note: Lead Agencies are not prohibited from establishing policies that extend eligibility beyond 12 months to align program requirements. For example, Lead Agencies can allow children enrolled in Head Start, Early Head Start, state or local Prekindergarten, and other collaborative programs to finish the program year or, similarly, parents enrolled in school can have eligibility extended to allow parents to finish their school year. This type of policy promotes continuity for families receiving services through multiple benefit programs.

In this section, Lead Agencies will identify how they define eligible children and families and how the Lead Agency improves access for vulnerable children and families. This section also addresses the policies that protect working families and determine a family's contribution to the child care payment.

Note: When asked for citations, responses can include state statute, regulations, administrative rules, policy manuals or policy issuances. See the Introduction on page 4 for more detail.

3.1 Eligible Children and Families

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At the time when eligibility is determined or redetermined, children must (1) be younger than age 13; (2) reside with a family whose income does not exceed 85 percent of the State's median income for a family of the same size and whose family assets do not exceed \$1,000,000 (as certified by a member of said family); and (3)(a) reside with a parent or parents who are working or attending a job training or educational program or (b) receives, or needs to receive, protective services and resides with a parent or parents not described in (3)(a.) (658P(4)); 98.20(a)).

3.1.1 Eligibility criteria: Age of children served

a) The CCDF program serves children

from 0

(weeks/months/years)

through 12

years (under age 13). Note: Do not include children incapable of self-care or under court supervision, who are reported below in (b) and (c).

b) Does the Lead Agency allow CCDF-funded child care for children age 13 and above but below age 19 years who are physically and/or mentally incapable of self-care?(658E(c)(3)(B), 658P(3))

No

Yes,

and the upper age is 18

(may not equal or exceed age 19).

If yes, Provide the Lead Agency definition of physical and/or mental incapacity: Over age 13, under age 18 and requires constant care due to physical, mental, or psychological condition, or supervision has been ordered by a court; Age 18 and a full-time high school student expected to graduate before age 19, who requires constant care due to a physical, mental or psychological condition, or court order.

c) Does the Lead Agency allow CCDF-funded child care for children age 13 and above but below age 19 years who are under court supervision? (658P(3), 658E(c)(3)(B))

No.

Yes

(may not equal or exceed age 19)

d) How does the Lead Agency define the following eligibility terms?

i. "residing with":

Living in the same household as the parent, except for temporary absences, during the time period for which services are offered.

ii. "in loco parentis":

A person living with the child needing child care services who is one of the following: a non-custodial parent, another related person who acts as a caretaker (responsible for care) of the child, a legal guardian, an unrelated adult who is at least 21 and whose petition for legal guardianship of the child is pending, an unrelated adult with whom Michigan Department of Health and Human Services (MDHHS) Children's Services has placed a child subsequent to a court order identifying MDHHS as responsible for the child's care and supervision.

3.1.2 Eligibility criteria: Reason for care

a. How does the Lead Agency define the following terms for the purposes of determining CCDF eligibility?

i. Define what is accepted as "Working" (including activities and any hour requirements):

Clients who are employed or self-employed. There is no minimum number of hours required. Michigan allows time for unpaid meals or breaks. Ten hours of travel time is added per two-week pay period unless additional travel time is requested and supported.

ii. Define what is accepted as "Job training" (including activities and any hour requirements):

Participation in an employment preparation and/or training activity or post-secondary education program (including online) is allowed. Michigan allows up to one hour of study/tutor time for each hour of class or lab time (or per credit hour per week if online only), if requested. Michigan allows time for meals or breaks. Ten hours of travel time is added per two-week pay period unless additional travel time is requested and supported.

iii. Define what is accepted as "Education" (including activities and any hour requirements):

Participation in high school completion, General Education Degree (GED), Adult Basic Education (ABE), or English as Second Language (ESL) is allowed (includes online classes). Michigan allows up to one hour of study / tutor time for each hour of class or lab time, if requested. Michigan allows time for meals or breaks. Ten hours of travel time is added per two-week pay period unless additional travel time is requested and supported.

iv. Define what is accepted as "Attending" (a job training or educational program) (e.g. travel time, hours required for associated activities such as study groups, lab experiences, time for outside class study or completion of homework):

Participation in high school completion, General Education Degree (GED), Adult Basic Education (ABE), or English as Second Language (ESL) is allowed (includes online classes). Michigan allows up to one hour of study / tutor time for each hour of class or lab time, if requested. Michigan allows time for meals or breaks. Ten hours of travel time is added per two-week pay period unless additional travel time is requested and supported.

3.1.2 Eligibility criteria: Reason for care

b. Does the Lead Agency allow parents to qualify for CCDF assistance on the basis of education and training without additional work requirements?

Yes

No,

If no, describe the additional work requirements.

n/a

c. Does the Lead Agency provide child care to children who receive, or need to receive protective services?

No.

Yes. If yes:

i. Provide the Lead Agency's definition of "protective services":

All age-eligible children whose parent/substitute parent has a need, and the child is placed with a licensed foster parent(s), the child or parent is receiving temporary assistance for needy families (TANF) or supplemental security income (SSI) benefits, the parent is a migrant farmworker, the child is experiencing homelessness, or the family has an active substantiated neglect/abuse case.

Note: Federal requirements allow other vulnerable children identified by the Lead Agency not formally in child protection to be included in the Lead Agency's definition of protective services for CCDF purposes. A Lead Agency may elect to provide CCDF-funded child care to children in foster care when foster care parents are not working or are not in education/training activities, but this provision should be included in the protective services definition above.

ii. Are children in foster care considered to be in protective services for the purposes of eligibility at determination?

- No
 Yes

iii. Does the Lead Agency waive the income eligibility requirements for cases in which children receive, or need to receive, protective services on a case-by-case basis (98.20 (a)(3)(ii)(A))?

- No
 Yes

iv. Does the Lead Agency waive the eligible activity (e.g., work, job training, education, etc.) requirements for cases in which children receive, or need to receive, protective services on a case-by-case basis?

- No
 Yes

v. Does the Lead Agency provide respite care to custodial parents of children in protective services?

- No
 Yes

3.1.3 Eligibility criteria: Family Income Limits

Note: The questions in 3.1.3 relate to initial determination. Redetermination is addressed in 3.1.8 and 3.2.5.

a. How does the Lead Agency define "income" for the purposes of eligibility at the point of initial determination?

Income means benefits or payments measured in money. Earned income means income

received from another person or organization or from self-employment for duties that were performed for remuneration or profit. Unearned income means all income that is not earned income.

b. Provide the CCDF income eligibility limits in the table below at the time of initial determination. Complete columns (i) and (ii) based on maximum eligibility at initial entry into CCDF. Complete columns (iii) and (iv) only if the Lead Agency is using income eligibility limits lower than 85 percent of the current state median income (SMI) at the initial eligibility determination point. If the income eligibility limits are not statewide, please complete the chart below using the most populous area of the state or territory (defined as the area serving highest number of CCDF children) and respond to c. below the table.

	(i)	(ii)	(iii)	(iv)
Family Size	100% of SMI(\$/Month)	85% of SMI (\$/Month) [Multiply (a) by 0.85]	(IF APPLICABLE) (\$/Month) Maximum Initial or First Tier Income Limit (or Threshold) if Lower Than 85% of Current SMI	IF APPLICABLE) (% of SMI) [Divide (iii) by (i), multiply by 100] Income Level if Lower Than 85% of Current SMI
1	3,886	3,303	1,595	41%
2	5,082	4,320	2,156	42%
3	6,277	5,336	2,715	43%
4	7,474	6,353	3,275	43%
5	8,669	7,369	3,836	44%

c. If the income eligibility limits are not statewide, describe how many jurisdictions set their own income eligibility limits and provide the income limit ranges across the jurisdictions (e.g. range from [lowest limit] to [highest limit])(98.16(i)(3)).

n/a

d. SMI source and year. <https://www.acf.hhs.gov/ocs/resource/liheap-im-2020-02-state-median-income-estimates-for-optional-use-fy2020-and-mandatory-use-fy2021>

Reminder: Reminder: Income limits must be established and reported in terms of current SMI based on the most recent data published by the Bureau of the Census (98.20(a)(2)(i)) even if the federal poverty level is used in implementing the program. SMI guidelines are available at: <https://www.acf.hhs.gov/ocs/resource/liheap-im-2020-02-state-median-income->

[estimates-for-optional-use-fy2020-and-mandatory-use-fy2021?utm_medium=rss.](#)

e. Identify the most populous area of the state (defined as the area serving the highest number of CCDF children) used to complete the chart in 3.1.3 b.

Rates are statewide.

f. What is the effective date for these eligibility limits reported in 3.1.3 b? 1/1/2021

g. Provide the citation or link, if available, for the income eligibility limits.

<https://dhhs.michigan.gov/OLMWEB/EX/RF/Public/RFT/270.pdf#pagemode=bookmarks>

3.1.4 Lead Agencies are required to ensure that children receiving CCDF funds do not have family assets that exceed \$1,000,000, as certified by a family member (98.20(a)(2)(ii)).

a) Describe how the family member certifies that family assets do not exceed \$1,000,000 (e.g., a checkoff on the CCDF application).

Self-certification by a checkbox on the assistance application and annual redetermination documents.

b) Does the Lead Agency waive the asset limit on a case-by-case basis for families defined as receiving, or in need of, protective services?

No.

Yes.

If yes, describe the policy or procedure and provide citation:

3.1.5 Describe any additional eligibility conditions or rules, which are applied by the Lead Agency (98.20(b)) during:

a. eligibility determination.

Two-parent households must confirm that child care valid need reason schedules overlap.

b. eligibility redetermination.

Two-parent households must confirm that child care valid need reason schedules overlap.

3.1.6 Lead Agencies are required to take into consideration children's development and promote continuity of care when authorizing child care services (98.21(f); 98.16(h)(6)). Lead Agencies are reminded that authorized child care services are not required to be strictly based on the work, training, or education schedule of the parent (98.21 (g)). Check the approaches, if applicable, that the Lead Agency uses when considering children's development and promoting continuity of care when authorizing child care services.

- a. Coordinating with Head Start, Prekindergarten, other early learning programs, or school-age programs to create a package of arrangements that accommodates parents' work schedules
- b. Inquiring about whether the child has an Individualized Education Program (IEP) or Individual Family Services Plan (IFSP)
- c. Establishing minimum eligibility periods greater than 12 months
- d. Using cross-enrollment or referrals to other public benefits
- e. Working with IDEA Part B, Section 619 and Part C staff to explore how services included in a child's IEP or IFSP can be supported and/or provided onsite and in collaboration with child care services
- f. Working with entities that may provide other child support services.
- g. Providing more intensive case management for families with children with multiple risk factors;
- h. Implementing policies and procedures that promote universal design to ensure that activities and environments are accessible to all children, including children with sensory, physical, or other disabilities
- i. Other.

Describe:

3.1.7 Fluctuation in earnings.

Check the processes that the Lead Agency uses to take into account irregular fluctuations in earnings.

- Average the family's earnings over a period of time (i.e. 12 months).
- Request earning statements that are most representative of the family's monthly income.
- Deduct temporary or irregular increases in wages from the family's standard income level.
- Other.

Describe:

Temporary excess income after initial eligibility may be permitted if it is verified that the income is not expected to last more than six months from the date of the change.

3.1.8 Lead Agencies are required to have procedures for documenting and verifying that children receiving CCDF funds meet eligibility criteria at the time of eligibility determination and redetermination (98.68(c)). Lead Agencies should note that there are no federal requirements for specific documentation or verification procedures. Check the information that the Lead Agency documents and verifies at initial determination and redetermination and describe, at a minimum, what information is required and how often. Check all that apply.

- Applicant identity.
- Required at Initial Determination
- Required at Redetermination

Describe:

Verified through documentation but may be verified through social security number (SSN)/name match through the Social Security Administration.

Applicant's relationship to the child.

Required at Initial Determination

Required at Redetermination

Describe:

Self-certification.

Child's information for determining eligibility (e.g., identity, age, citizen/immigration status).

Required at Initial Determination

Required at Redetermination

Describe:

Self-certified, unless questionable. Documentation for immigration status of alien children.

Work.

Required at Initial Determination

Required at Redetermination

Describe:

Valid need reason; verified by documentation.

Job training or educational program.

Required at Initial Determination

Required at Redetermination

Describe:

Valid need reason; verified by schedule from oversight entity.

Family income.

Required at Initial Determination

Required at Redetermination

Describe:

Only for those who do not qualify for protective services. Verified by documentation.

Household composition.

Required at Initial Determination

Required at Redetermination

Describe:

Self-certification.

Applicant residence.

Required at Initial Determination

Required at Redetermination

Describe:

Must be verified at application by documentation.

Other.

Required at Initial Determination

Required at Redetermination

Describe:

3.1.9 Which strategies, if any, will the Lead Agency use to ensure the timeliness of eligibility determinations upon receipt of applications? Check all that apply.

Time limit for making eligibility determinations

Describe length of time:

MDHHS local office staff have a maximum of 30 days to process complete applications, unless eligible for expedited processing, which is 7 days.

Track and monitor the eligibility determination process

Other.

Describe:

None

3.1.10 Informing parents who receive TANF benefits about the exception to the individual penalties associated with the TANF work requirement.

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Lead Agencies are required to inform parents who receive TANF benefits about the exception to the individual penalties associated with the work requirement for any single custodial parent who has a demonstrated inability to obtain needed child care for a child younger than age 6 (98.16(v); 98.33(f)).

Lead Agencies must coordinate with TANF programs to ensure that TANF families with young children will be informed of their right not to be sanctioned if they meet the criteria set forth by the state/territory TANF agency in accordance with Section 407(e)(2) of the Social Security Act.

In fulfilling this requirement, the following criteria or definitions are applied by the TANF agency to determine whether the parent has a demonstrated inability to obtain needed child care.

Note: The TANF agency, not the CCDF Lead Agency, is responsible for establishing the following criteria or definitions. These criteria or definitions are offered in this Plan as a matter of public record.

a. Identify the TANF agency that established these criteria or definitions: MDHHS

b. Provide the following definitions established by the TANF agency:

i. "Appropriate child care":

The care is appropriate to the child's age, disabilities, and other conditions.

ii. "Reasonable distance":

The total commuting time to and from work and the child care facility does not exceed three hours per day.

iii. "Unsuitability of informal child care":

If the provider does not meet applicable state and local standards. Also, license

exempt providers who are not licensed by the Child Care Licensing Bureau (CCLB) must meet Michigan Department of Education (MDE) enrollment requirements.

iv. "Affordable child care arrangements":

The child care is provided at the rate of payment or reimbursement offered by MDE.

c. How are parents who receive TANF benefits informed about the exception to the individual penalties associated with the TANF work requirements?

i. In writing

ii. Verbally

iii. Other.

Describe:

d. Provide the citation for the TANF policy or procedure:

<https://dhhs.michigan.gov/OLMWEB/EX/BP/Public/BEM/233A.pdf#pagemode=bookmark>

s.

3.2 Family Contribution to Payments

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Lead Agencies are required to establish and periodically revise a sliding-fee scale for CCDF families that varies based on income and the size of the family to determine each family's contribution (i.e., co-payment) that is not a barrier to families receiving CCDF funds (658E(c)(5)). In addition to income and the size of the family, the Lead Agency may use other factors when determining family contributions/co-payments. Questions 3.2.1 through 3.2.4 address co-payments during the initial/entry-eligibility period.

To help families transition off of child care assistance, Lead Agencies may gradually adjust co-pay amounts for families determined to be eligible under a graduated phase-out. Question 3.2.5 addresses co-payments during the graduated phase-out period.

3.2.1 Provide the CCDF co-payments in the chart below according to family size for one child in care.

a. Complete the chart based on the most populous area of the state or territory (defined as the area serving the highest number of CCDF children, aligned to the response provided in 3.1.3 e).

	(a)	(b)	(c)	(d)	(e)	(f)
Family Size	Lowest initial or First Tier Income Level where family is first charged co-pay (greater than \$0)	What is the monthly co-payment for a family of this size based on the income level in (a)?	What percentage of income is this co-payment in (b)?	Highest initial or First Tier Income Level before a family is no longer eligible.	What is the monthly co-payment for a family of this size based on the income level in (d)?	What percentage of income is this co-payment in (d)?
1	1,595	32	2.00%	3,303	168	5.01%
2	2,156	32	1.48%	4,320	168	3.88%
3	2,715	32	1.18%	5,336	168	3.15%
4	3,275	32	0.97%	6,353	168	2.64%
5	3,836	32	0.83%	7,369	168	2.80%

b. If the sliding-fee scale is not statewide (i.e., county-administered states):

i. N/A. Sliding fee scale is statewide

ii. Identify the most populous area of the state (defined as the area serving the highest number of CCDF children) used to complete the chart above.

iii. Describe how many jurisdictions set their own sliding-fee scale (98.16(i)(3)).

c. What is the effective date of the sliding-fee scale(s)? 1/1/2021

d. Provide the link(s) to the sliding-fee scale:

<https://dhhs.michigan.gov/OLMWEB/EX/RF/Public/RFT/270.pdf#pagemode=bookmarks>.

3.2.2 How will the family's contribution be calculated, and to whom will it be applied?

Check all that apply under a. or b.

a. The fee is a dollar amount and (check all that apply):

- i. The fee is per child, with the same fee for each child.
- ii. The fee is per child and is discounted for two or more children.
- iii. The fee is per child up to a maximum per family.
- iv. No additional fee is charged after certain number of children.
- v. The fee is per family.
- vi. The contribution schedule varies because it is set locally/regionally (as indicated in 1.2.1).

Describe:

vii. Other.

Describe:

b. The fee is a percent of income and (check all that apply):

- i. The fee is per child, with the same percentage applied for each child.
- ii. The fee is per child, and a discounted percentage is applied for two or more children.
- iii. The fee is per child up to a maximum per family.
- iv. No additional percentage is charged after certain number of children.
- v. The fee is per family.
- vi. The contribution schedule varies because it is set locally/regionally (as indicated in 1.2.1).

Describe:

vii. Other.

Describe:

3.2.3 Does the Lead Agency use other factors in addition to income and family size to determine each family's co-payment (658E(c)(3)(B))? Reminder ' Lead Agencies may NOT use cost of care or amount of subsidy payment in determining copayments (98.45(k)(2)).

No.

Yes, check and describe those additional factors below.

a. Number of hours the child is in care.

Describe:

b. Lower co-payments for a higher quality of care, as defined by the state/territory.

Describe:

Co-payments are waived for 3, 4, or 5 star rated child care providers.

c. Other.

Describe:

3.2.4 The Lead Agency may waive contributions/co-payments from families whose incomes are at or below the poverty level for a family of the same size (98.45(k)) or for families who are receiving or needing to receive protective services, on a case-by-case basis, as determined for purposes of CCDF eligibility, or who meet other criteria established by the Lead Agency (98.45(k)(4)). Does the Lead Agency waive family contributions/co-payments for any of the following? Check all that apply.

No, the Lead Agency does not waive family contributions/co-payments.

Yes, the Lead Agency waives family contributions/co-payments. If yes, identify and describe which families have their family contributions/co-payments waived.

a. Families with an income at or below the Federal poverty level for families of the same size.

Describe the policy and provide the policy citation.

Families with income under 100% of the federal poverty limit (FPL) do not have a

family contribution/co-payment.

- b. Families who are receiving or needing to receive protective services on a case-by-case basis, as determined by the Lead Agency for purposes of CCDF eligibility.

Describe the policy and provide the policy citation.

Bridges Eligibility Manual (BEM) 703, Child Development and Care (CDC) protective services, includes Children's Protective Services, foster care, Temporary Assistance for Needy Families (TANF)/supplemental security income (SSI), migrant farmworkers, and homeless. These groups are income waived and co-payment waived.

- c. Families meeting other criteria established by the Lead Agency. Describe the policy.

3.2.5 Policies and processes for graduated phase-out of assistance at redetermination.

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Lead Agencies that establish initial family income eligibility below 85 percent of state median income (SMI) are required to provide a graduated phase-out of assistance for families whose income has increased above the state's initial income threshold at the time of redetermination but remains below the federal threshold of 85 percent of the state median income (98.21 (b)(1)). Providing a graduated phase-out promotes continuity by allowing for wage growth, allows for a tapered transition out of the child care subsidy program as income increases, and supports long-term self-sufficiency for families.

Lead Agencies that provide a graduated phase-out must implement a two-tiered eligibility threshold, with the second tier of eligibility (used at the time of eligibility redetermination) to be set at:

At redetermination, a child shall be considered eligible if his or her parents are working or attending a job training or educational program even if their income exceeds the Lead Agency's income limit to initially qualify for assistance as long as their income does not exceed the second tier of eligibility (98.21(a); 98.21(b)(1)). Note that once deemed eligible, the family shall be considered eligible for a full minimum 12-month eligibility period, even if their income exceeds the second tier of eligibility during the eligibility period, as long as it does not exceed 85 percent of SMI.

A family eligible for services via the graduated phase-out of assistance is considered eligible under the same conditions as other eligible families with the exception of the co-payment restrictions, which do not apply to a graduated phase-out. To help families transition off of child care assistance, Lead Agencies may gradually adjust copay amounts for families whose children are determined eligible under a graduated phase-out and may require additional reporting on changes in family income. However, Lead Agencies must still ensure that any additional reporting requirements do not constitute an undue burden on families.

Lead Agencies that establish initial family income eligibility below 85 percent of state median income (SMI) are required to provide a graduated phase-out of assistance for families whose income has increased above the state's initial income threshold at the time of redetermination but remains below the federal threshold of 85 percent of the state median income (98.21 (b)(1)). Providing a graduated phase-out promotes continuity by allowing for wage growth, allows for a tapered transition out of the child care subsidy program as income increases, and supports long-term self-sufficiency for families.

a. Check and describe the option that best identifies the Lead Agency's policies and procedures regarding the graduated phase-out of assistance.

N/A. The Lead Agency sets its initial eligibility threshold at 85 percent of SMI and therefore, is not required to provide a graduated phase-out period. (If checked, skip to subsection 3.3)

The Lead Agency sets the second tier of eligibility at 85 percent of SMI.

A. Describe the policies and procedures.

B. Provide the citation for this policy or procedure.

The Lead Agency sets the second tier of eligibility at an amount lower than 85 percent of SMI for a family of the same size but above the Lead Agency's

initial eligibility threshold.

A. Provide the income level for the second tier of eligibility for a family of three: The entry income level for a family size of 3 is \$2,715.

B. Describe how the second eligibility threshold:

1. Takes into account the typical household budget of a low-income family:

Families with income under 100% of the federal poverty level (FPL) do not have a family contribution/co-payment. Initial income eligibility is limited to a maximum of 150% FPL. Income greater than 100% FPL not exceeding 150% FPL is assigned a \$15 (bi-weekly) per child co-payment (\$45 pr family co-payment limit).

2. Is sufficient to accommodate increases in family income over time that are typical for low-income workers and that promote and support family economic stability:

Families determined income eligible would then have five eligibility income thresholds of progressively increasing co-payment amounts to allow for a graduated phase out, ending with the exit limit of 85% State Median Income by family size.

3. Reasonably allows a family to continue accessing child care services without unnecessary disruption:

Once approved, clients remain continuously eligible for the CDC program for 12 months despite most changes in their circumstance. The following are the only reasons for disruption of the CDC program: Client request closure; unable to locate; non-cooperation with child support; welfare fraud/intentional program violation (IPV) sanction; moved out of state; excess income; the only authorized child ages out or leave the home; the only parent/substitute parent on the case leaves household; minor parent, active on legal guardian's case, turns 18; over a million dollars in assets. Bridges Administrative Manual (BAM) 220.

4. Provide the citation for this policy or procedure related to the second eligibility threshold:

<https://dhhs.michigan.gov/OLMWEB/EX/RF/Public/RFT/270.pdf#pagemode=bookmarks>

3.2.5 b. To help families transition from assistance, does the Lead Agency gradually adjust co-payments for families eligible under the graduated phase-out period?

No

Yes

i. If yes, describe how the Lead Agency gradually adjusts copayments for families under a graduated phase-out.

Families with income under 150% of FPL do not have a family contribution/co-payment. Income greater than 100% of FPL not exceeding 150% of FPL is assigned a \$15 per child co-payment (\$45 per family co-payment limit). Families determined income eligible would then have five eligibility income thresholds of progressively increasing co-payment amounts to allow for a graduated phase out, ending with the exit limit of 85% state median income by family size.

ii. If yes, does the Lead Agency require additional reporting requirements during the graduated phase-out period? *(Note: Additional reporting requirements are also discussed in section 3.4.3 of the plan.)*

No.

Yes.

Describe:

Income eligible families who reach the exit limit of 85% state median income by family size must report this change in income.

3.3 Increasing Access for Vulnerable Children and Families

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Lead Agencies are required to give priority for child care assistance to children with special needs, which can include vulnerable populations, in families with very low incomes and to children experiencing homelessness (658E(c)(3)(B); 98.46(a)). The prioritization of CCDF assistance services is not limited to eligibility determination (i.e., the establishment of a waiting

list or the ranking of eligible families in priority order to be served).

Note:

CCDF defines "child experiencing homelessness" as a child who is homeless, as defined in Section 725 of Subtitle VII-B of the McKinney-Vento Act (42 U.S.C. 11434a) (98.2).

3.3.1 Describe how the Lead Agency defines:

a) "Children with special needs":

Age 13, under age 18 and requires constant care due to physical, mental, or psychological condition, or supervision has been ordered by a court; Age 18 and a full-time high school student expected to graduate before age 19, who requires constant care due to a physical, mental, or psychological condition, or court order.

b) "Families with very low incomes":

Families with income at or below 100% of FPL.

3.3.2 Identify how the Lead Agency will prioritize or target child care services for the following children and families:

Note: If waiving co-payments is checked, Lead Agencies will need to provide further information in question 3.2.4. Paying higher rates for accessing higher quality care is addressed in 4.3.3 and using grants or contracts to reserve spots is addressed in 4.1.6.

a) Indicate how the identified populations are prioritized or targeted.

i. Indicate how services are prioritized for children with special needs. Check all that apply:

Prioritize for enrollment in child care services

Serve without placing on waiting list

- Waive co-payments (on a case-by-case basis). As described in 3.2.4
- Pay higher rate for access to higher quality care
- Using grants or contracts to reserve spots

ii. Indicate how services are prioritized for families with very low incomes. Check all that apply:

- Prioritize for enrollment in child care services
- Serve without placing on waiting list
- Waive co-payments (on a case-by-case basis). As described in 3.2.4
- Pay higher rate for access to higher quality care
- Using grants or contracts to reserve spots

iii. Indicate how services are prioritized for children experiencing homelessness, as defined by the CCDF. Check all that apply:

- Prioritize for enrollment in child care services
- Serve without placing on waiting list
- Waive co-payments (on a case-by-case basis). As described in 3.2.4
- Pay higher rate for access to higher quality care
- Using grants or contracts to reserve spots

iv. Indicate how services are prioritized, for families receiving TANF, those attempting to transition off TANF, and those at risk of becoming dependent on TANF (98.16(i)(4)). Check all that apply:

- Prioritize for enrollment in child care services
- Serve without placing on waiting list
- Waive co-payments (on a case-by-case basis). As described in 3.2.4
- Pay higher rate for access to higher quality care
- Using grants or contracts to reserve spots

b. If applicable, identify and describe any other ways the identified populations in the table above are prioritized or targeted.

n/a

3.3.3 List and define any other priority groups established by the Lead Agency.

Homeless children, migrant farm workers, SSI recipients, foster care, children’s protective services.

3.3.4 Describe how the Lead Agency prioritizes services for the additional priority groups identified in 3.2.3.

Waive co-payments, pay higher rate for quality care, no waiting list.

3.3.5 Lead Agencies are required to expend CCDF funds to (1) permit the enrollment (after an initial eligibility determination) of children experiencing homelessness while required documentation is obtained, (2) provide training and technical assistance to child care providers and the appropriate Lead Agency (or designated entity) staff on identifying and serving homeless children and families (addressed in section 6), and (3) conduct specific outreach to homeless families (658E(c)(3); 98.51).

a. Describe the procedures to permit the enrollment of children experiencing homelessness while required documentation is obtained.

After identity of the applicant is verified and an interview is conducted, eligibility is presumed for up to 45 days based on the applicant's statement for any documentation that is not provided.

b. Check, where applicable, the procedures used to conduct outreach for children experiencing homelessness (as defined by CCDF Rule) and their families.

- i. Lead Agency accepts applications at local community-based locations
- ii. Partnerships with community-based organizations

- iii. Partnering with homeless service providers, McKinney-Vento liaisons, and others who work with families experiencing homelessness to provide referrals to child care
- iv. Other

Note: The Lead Agency shall pay any amount owed to a child care provider for services provided as a result of the initial eligibility determination, and any CCDF payment made prior to the final eligibility determination shall not be considered an error or improper payment (98.51(a)(1)(ii)).

3.3.6 Lead Agencies must establish a grace period that allows homeless children and children in foster care to receive CCDF assistance while providing their families with a reasonable time to take any necessary actions to comply with immunization and other health and safety requirements (as described in section 5). The length of such a grace period shall be established in consultation with the state, territorial, or tribal health agency (658E(c)(2)(I)(i)(I); 98.41(a)(1)(i)(C)).

Note:

Any payment for such a child during the grace period shall not be considered an error or improper payment (98.41(a)(1)(i)(C)(2)).

a) Describe procedures to provide a grace period to comply with immunization and other health and safety requirements, including how the length of the grace period was established in consultation with the state, territorial, or tribal health agency for:

i. Children experiencing homelessness (as defined by Lead Agency's CCDF)

At application, applicants are asked whether the child is up to date on immunizations. If not, the child must be up to date by the next redetermination (12-months) or have a religious or medical objection that prevents them from being up to date. Child care subsidy requirements were aligned with TANF requirements to provide the most consistency for parents applying for assistance.

Provide the citation for this policy and procedure.

Brides Eligibility Manual (BEM 202), Immunizations.

ii. Children who are in foster care.

At application, applicants will be asked whether the child is up to date on immunizations (shots). If not, the child must be up to date by the next redetermination(12-months) or have a religious or medical objection that prevents them from being up to date. Child care subsidy requirements were aligned with TANF requirements to provide the most consistency for parents applying for assistance.

Provide the citation for this policy and procedure.

BEM 202, Immunizations.

b) Describe how the Lead Agency coordinates with licensing agencies and other relevant state, territorial, tribal, and local agencies to provide referrals and support to help families with children receiving services during a grace period comply with immunization and other health and safety requirements (98.41(a)(1)(i)(C)(4)).

A cross-agency policy workgroup was designated to identify what immunization policies are already in place and where alignment across programs might happen in a way that would provide consistency to parents and children. The following policy areas coordinated their policy requirements of parents as it relates to children's immunizations: MDHHS; Child Welfare/Children's Services/Foster Care, Family Independence Program (FIP), Public Health Code (PHC); Licensing and Regulatory Affairs (LARA), CCLB; MDE, CDC. Additional support was provided by: MDHHS, Medical Assistance (MA) program; MDE, Homeless Education Program. Several areas were reviewed to identify potential alignment; changes were recommended in the following areas: vaccination schedule, grace period, waiver, and verification requirements. The recommendations include the following: Communications from all entities strive to allow room for physicians to provide guidance in the child's best interest, over and above those minimum State of Michigan vaccination minimum requirements. The Center for Disease Control and prevention immunization recommendations should be encouraged. Child care subsidy align with TANF subsidy in allowing families one year from the time it is discovered that a child is not age appropriately immunized to become compliant with immunization requirements. In an effort to prevent an additional burden on parents, it was recommended that child care subsidy adopt the same or similar self-certification as utilized by TANF and child care homes.

c) Does the Lead Agency establish grace periods for other children who are not experiencing homelessness or in foster care?

No.

Yes.

Describe:

12-month grace period, as described above, applies to all CCDF applicants.

3.4 Continuity for Working Families

3.4.1 Minimum 12-month eligibility.

3.4.1 Minimum 12-month eligibility.

The Lead Agency is required to establish a minimum 12-month eligibility and redetermination period:

regardless of changes in income. Lead Agencies may not terminate CCDF assistance during the minimum 12-month period if a family has an increase in income that exceeds the state's income eligibility threshold but not the federal threshold of 85 percent of state median income (SMI).regardless of temporary changes in participation in work, training, or educational activities (658E(c)(2)(N)(i) and (ii)).The Lead Agency may not terminate assistance prior to the end of the minimum 12-month period if a family experiences a temporary job loss or a temporary change in participation in a training or educational activity. Any temporary change cannot have a time limit (e.g. 60 days, 90 days, etc.). A temporary change in eligible activity includes, at a minimum:

any time-limited absence from work for an employed parent due to such reasons as the need to care for a family member or an illness any interruption in work for a seasonal worker who is not working any student holiday or break for a parent participating in a training or educational program any reduction in work, training, or education hours, as long as the parent is still working or attending a training or educational program any other cessation of work or attendance at a training or educational program that does not exceed 3 months or a longer period of time established by the Lead Agency a child turning 13 years old during the minimum 12-month eligibility period (except as described in 3.1.1)any changes in residency within the state, territory, or tribal service area

a. Describe the Lead Agency's policies and procedures related to providing a minimum

12-month eligibility period at initial eligibility determination and redetermination and provide a citation for these policies or procedures.

At application or redetermination, eligibility for CDC services exists when the department has established all the following: There is a signed application and a request for CDC services, each child for whom CDC is requested is a member of a valid eligibility group, each parent or substitute parent in the home has valid need reason, all eligibility criteria are met. Once eligibility has been determined, the child will remain eligible for the entire 12-month period. Citation: BEM 703.

The Lead Agency is required to establish a minimum 12-month eligibility and redetermination period

b. Describe and provide the citation for each of the minimum required elements listed below that are included in the Lead Agency's definition of "temporary change".

- i. Any time-limited absence from work for an employed parent due to such reasons as the need to care for a family member or an illness.

Describe or define your Lead Agency's policy:

During the 12-month eligibility period any changes on the CDC case will not cause closure or a reduction in benefits, other than those found on the CDC eligibility determination group (EDG) closure list found in BAM 220 or a case correction due to an incorrect eligibility determination.

Citation:

BAM 210, BAM 22, BEM 703

- ii. Any interruption in work for a seasonal worker who is not working.

Describe or define your Lead Agency's policy:

During the 12-month eligibility period any changes on the CDC case will not cause closure or a reduction in benefits, other than those found on the CDC EDG closure list found in BAM 220 or a case correction due to an incorrect eligibility determination.

Citation:

BAM 210, BAM 22, BEM 703

- iii. Any student holiday or break for a parent participating in a training or educational program.

Describe or define your Lead Agency's policy:

During the 12-month eligibility period any changes on the CDC case will not cause closure or a reduction in benefits, other than those found on the CDC EDG closure list found in BAM 220 or a case correction due to an incorrect eligibility determination.

Citation:

BAM 210, BAM 22, BEM 703

- iv. Any reduction in work, training, or education hours, as long as the parent is still working or attending a training or educational program.

Describe or define your Lead Agency's policy:

During the 12-month eligibility period any changes on the CDC case will not cause closure or a reduction in benefits, other than those found on the CDC EDG closure list found in BAM 220 or a case correction due to an incorrect eligibility determination.

Citation:

BAM 210, BAM 22, BEM 703

- v. Any other cessation of work or attendance at a training or educational program that does not exceed 3 months or a longer period of time established by the Lead Agency.

Describe or define your Lead Agency's policy:

During the 12-month eligibility period any changes on the CDC case will not cause closure or a reduction in benefits, other than those found on the CDC EDG closure list found in BAM 220 or a case correction due to an incorrect eligibility determination.

Citation:

BAM 210, BAM 22, BEM 703

- vi. A child turning 13 years old during the minimum 12-month eligibility period (except as described in 3.1.1).

Describe or define your Lead Agency's policy:

Eligible children who turn age 13 during the 12-month eligibility period would remain eligible until redetermination.

Citation:

BAM 210, BAM 22, BEM 703

- vii. Any changes in residency within the state, territory, or tribal service area.

Describe or define your Lead Agency's policy:

During the 12-month eligibility period any changes on the CDC case will not cause closure or a reduction in benefits, other than those found on the CDC EDG closure list found in BAM 220 or a case correction due to an incorrect eligibility determination.

Citation:

BAM 210, BAM 22, BEM 703

c. Provide any other elements included in the state's definition of "temporary change", including those implemented during the pandemic, and provide the citation.

During the 12-month eligibility period, any changes on the CDC case will not cause closure or a reduction in benefits other than those found on the CDC EDG closure list found in BAM 220 or a case correction due to an incorrect eligibility determination.

3.4.2 Continuing assistance for "job search" and a Lead Agency's option to discontinue assistance during the minimum 12-month eligibility period.

a. Does the Lead Agency consider seeking employment (engaging in a job search) an eligible activity at initial eligibility determination (at application) and at the minimum 12-month eligibility redetermination? (Note: If yes, Lead Agencies must provide a minimum of three months of job search.)

3.4.2 Continuing assistance for "job search" and a Lead Agency's option to discontinue assistance during the minimum 12-month eligibility period.

Lead Agencies have the option, but are not required, to discontinue assistance during the minimum 12-month eligibility period due to a parent's non-temporary loss of work or cessation of attendance at a job training or educational program, otherwise known as a parent's eligible activity.

If the Lead Agency chooses the option to discontinue assistance due to a parent's non-temporary loss or cessation of eligible activity, it must continue assistance at least at the same level for a period of not fewer than 3 months after each such loss or cessation. This time period allows the parent to engage in a job search and to resume work or resume attendance in a job training or educational program. At the end of the minimum 3-month period of continued assistance, if the parent has engaged in a qualifying work, training, or educational program activity with an income below 85 percent of state median income (SMI), assistance cannot be terminated, and the child must continue receiving assistance until the next scheduled redetermination or, at the Lead Agency option, for an additional minimum 12-month eligibility period.

No.

Yes.

If yes, describe the policy or procedure (including any differences in eligibility at initial eligibility determination vs. redetermination of eligibility):

b. Does the Lead Agency discontinue assistance during the minimum 12-month eligibility period due to a parent's non-temporary loss or cessation of eligible activity and offer a minimum 3-month period to allow parents to engage in a job search and to resume participation in an eligible activity?

No, the state/territory does not discontinue assistance during the 12-month eligibility period due to a parent's non-temporary loss of work or cessation of attendance at a job training or educational program.

Yes, the Lead Agency discontinues assistance during the 12-month eligibility period due to a parent's non-temporary loss of work or cessation of eligible activity and provides a minimum 3-month period of job search. If yes:

i. Provide a summary describing the Lead Agency's policies and procedures for discontinuing assistance due to a parent's non-temporary change:

ii. Describe what specific actions/changes trigger the job-search period after each such loss or cessation:

iii. How long is the job-search period (must be at least 3 months)?

iv. Provide the citation for this policy or procedure.

c. The Lead Agency may discontinue assistance prior to the next minimum 12-month redetermination in the following limited circumstances. Check and describe any circumstances in which the Lead Agency chooses to discontinue assistance prior to the next minimum 12-month redetermination. Check all that apply.

i. Not applicable.

ii. Excessive unexplained absences despite multiple attempts by the Lead Agency or designated entity to contact the family and provider, including the prior notification of a possible discontinuation of assistance.

A. Define the number of unexplained absences identified as excessive:

B. Provide the citation for this policy or procedure:

iii. A change in residency outside of the state, territory, or tribal service area.

Provide the citation for this policy or procedure:

BAM 220, CDC EDG closure reasons.

iv. Substantiated fraud or intentional program violations that invalidate prior determinations of eligibility.

Describe the violations that lead to discontinued assistance and provide the citation for this policy or procedure.

BAM 220, CDC EDG closure. reasons; BAM 720, definitions.

3.4.3 Change reporting during the minimum 12-month eligibility period.

3.4.3 Change reporting during the minimum 12-month eligibility period.

The Lead Agency must describe the requirements for parents to report changes in circumstances during the 12-month eligibility period and describe efforts to ensure that such requirements do not place an undue burden on eligible families, which could impact the continuity of care for children and stability for families receiving CCDF services (98.21 (e)).

Note: Responses should exclude reporting requirements for a graduated phase-out, which were described in question 3.2.5 b.

Families are required to report a change to the Lead Agency at any time during the 12-month eligibility period if the family's income exceeds 85 percent of the state median income, taking into account irregular fluctuations in income (98.21(e)(1)). If the Lead Agency chooses the option to terminate assistance, as described in section 3.4.2 of the Plan, they may require families to report a non-temporary change in work, training or educational activities (otherwise known as a parent's eligible activity).

a. Does the Lead Agency require families to report a non-temporary change in a parent's eligible activity?

No

Yes

b. Any additional reporting requirements during the 12-month eligibility period must be limited to items that impact a family's eligibility (e.g., income changes over 85 percent of state median income (SMI)) or that impact the Lead Agency's ability to contact the family or pay the child care providers (e.g., a family's change of address, a change in the parent's choice of child care provider).

Check and describe any additional reporting requirements required by the Lead Agency during the 12-month eligibility period. Check all that apply.

i. Additional changes that may impact a family's eligibility during the 12-month period.

Describe:

CDC clients are required to report changes in group composition/death, out of state residency, assets that exceed \$1 million, or income that exceeds the income eligibility scale for the family size (income eligible families only).

ii. Changes that impact the Lead Agency's ability to contact the family.

Describe:

Clients must report change in address. Documentation is not required.

- iii. Changes that impact the Lead Agency's ability to pay child care providers.

Describe:

CDC clients are required to report changes in child care providers or settings.

c. Any additional reporting requirements that the Lead Agency chooses to require from parents during the minimum 12-month eligibility period, shall not require an additional office visit. In addition, the Lead Agency must offer a range of notification options to accommodate families. How does the Lead Agency allow families to report changes to ensure that reporting requirements are not burdensome and to avoid an impact on continued eligibility between redeterminations? Check all that apply.

- i. Phone
- ii. Email
- iii. Online forms
- iv. Extended submission hours
- v. Postal Mail
- vi. FAX
- vii. In-person submission
- viii. Other.

Describe:

a) Families must have the option to voluntarily report changes on an ongoing basis during the minimum 12-month eligibility period. Lead Agencies are required to act on information reported by the family if it will reduce the family's co-payment or increase the family's subsidy. Lead Agencies are prohibited from acting on information reported by the family that would reduce the family's subsidy unless the information reported indicates that the family's income exceeds 85 percent of SMI after considering irregular fluctuations in income or, at the option of the Lead Agency, the family has experienced a non-temporary change in eligible activity.

i. Describe any other changes that the Lead Agency allows families to report.

Once a family is determined to be eligible, they will be eligible for 12 months, regardless of change in status pertaining to work, education, or training. A

determination for CDC cannot be completed earlier than the 12-month eligibility period. Income eligible families who reach 85% of the SMI by family size will no longer be eligible (if the increase is not temporary excess income). Families may report any change in circumstance, in addition to the changes they are required to report. Reported changes are documented and only changes which result in a positive action may affect the case, except the following: Client requests closure, unable to locate, child support non-cooperation (income eligible only), substantiated welfare fraud or intentional program violation (IPV) sanction, incarceration of only adult in group, loss of Michigan residency, income over 85% SMI, only authorized child leaves the home, minor parent turns 18, or assets exceed \$1 million.

ii. [Provide the citation for this policy or procedure.](#)

BAM 220-Negative Actions; BAM 210- Redetermination/Ex Parte review.

[3.4.4 Prevent the disruption of employment, education, or job training activities](#)

[3.4.4 Prevent the disruption of employment, education, or job training activities.](#)

[Lead Agencies are required to have procedures and policies in place to ensure that parents \(especially parents receiving assistance under the TANF program\) are not required to unduly disrupt their employment, education, or job training activities to comply with the Lead Agency's or designated local entity's requirements for the redetermination of eligibility for assistance \(658E\(c\)\(2\)\(N\)\(ii\); 98.21\(d\)\).](#)

[Examples include developing strategies to inform families and their providers of an upcoming redetermination and the information that will be required of the family, pre-populating subsidy renewal forms, having parents confirm that the information is accurate, and/or asking only for the information necessary to make an eligibility redetermination. In addition, states and territories can offer a variety of family-friendly methods for submitting documentation for eligibility redetermination that considers the range of needs for families in accessing support \(e.g., use of languages other than English, access to transportation, accommodation of parents working non-traditional hours\).](#)

[a\) Identify, where applicable, the Lead Agency's procedures and policies to ensure that](#)

parents (especially parents receiving TANF program funds) do not have their employment, education, or job training unduly disrupted to comply with the state/territory's or designated local entity's requirements for the redetermination of eligibility. Check all that apply.

- i. Advance notice to parents of pending redetermination
- ii. Advance notice to providers of pending redetermination
- iii. Pre-populated subsidy renewal form
- iv. Online documentation submission
- v. Cross-program redeterminations
- vi. Extended office hours (evenings and/or weekends)
- vii. Consultation available via phone
- viii. Other.

Describe: