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Nevada Child Care and Development Program FREQUENTLY ASKED QUESTIONS (FAQ) Last Updated: August 7, 2024

1. What is the Family Copayment Contribution?

The Administration for Children and Families (ACF) Office of Child Care (OCC) requires some families participating in the Child Care and Development Program (CCDP) to pay an affordable copayment set by the Nevada Division of Welfare and Supportive Services (DWSS) to cover a portion of their care.

The Family Copayment Contribution is the amount owed by the participating family to their child care provider. The copayment amount is different from any Overage that may be owed by the parent to the child care provider as a result of the provider's price being higher than the base subsidy reimbursement rate. This amount is displayed as the "Applied Portion" listed on the child's Child Care Certificate.

Family Copayment Contributions are applied using a sliding fee scale based on household size and income. The sliding fee scale ranges from 0% for those in the lowest income tiers of eligibility to a maximum of 7% for those in the highest income tiers of eligibility. Examples of how the Family Copayment Contribution is calculated and applied are included later in this FAQ.

2. What is an Overage?

An Overage is the difference between the base subsidy reimbursement rate and the price the provider charges. The participating family is responsible to pay the applied portion of their Family Copayment Contribution and any Overage directly to their child care provider(s). The Family Copayment Contribution and Overage equal the total Monthly Parent/Guardian Responsibility and the amounts are noted on the Child Care Certificate.

3. What is the Base Subsidy Reimbursement Rate?

The Base Subsidy Reimbursement Rate is the 1-star rate cited on the current <u>Child Care Subsidy Reimbursement Rates</u> chart for licensed provider types. Also noted on the chart is the Base Subsidy Reimbursement Rate for Family, Friend, Neighbor (FFN) providers and Head Start Wraparound providers.

4. What is the subsidy reimbursement policy moving forward?

Currently, the only changes to the subsidy reimbursement policy are the reinstatement of Family Copayment Contributions and the implementation of a waitlist.

a. Child care subsidy reimbursements are a shared cost that is a combination of the Family Copayment Contribution (federal requirement) and the Base Subsidy Reimbursement Rate. The Base Subsidy Reimbursement Rate is paid directly to the child care provider from their designated Child Care Resource and Referral (CCR&R) agency. The Family Copayment Contribution must be paid by the family. Payments to registered child care providers are reimbursed in accordance with the approved Base Subsidy Reimbursement Rate plus any rate differential that is based on the child care provider's star rating at the time the child care services were performed. Families will pay no more than 7% of their household income as their Family Copayment Contribution as required by the ACF/OCC; however, families may still owe an Overage to a provider who charges more than the Base Subsidy Reimbursement Rate (examples are below).

b. A waitlist is in effect as of April 1, 2024, for all new applications, except for those involving families experiencing homelessness, families participating in the New Employees of Nevada (NEON) program, and children involved in the CPS/Foster system.

5. What are the major changes to the subsidy reimbursement policy and what is staying the same?

One significant change is the elimination of the subsidy sliding fee scale. DWSS/CCDP requires that child care providers receive the Base Subsidy Reimbursement Rate. This change is mandated by our federal funders. The ACF/OCC requires states to cap family copays at no more than 7% of household income.

EXAMPLE

A parent enrolls in the Child Care and Development Program. Previously, CCDP used a sliding fee scale to pay a specific percentage of the Base Subsidy Reimbursement Rate with the parent paying the remaining percentage (e.g., 90%/10%, 80%/20%, etc.). For the examples below we are using the Base Subsidy Reimbursement Rate for an infant attending a Center in Clark County which equals \$1,375/month.

Old System (Center-based provider caring for an infant in Clark County):

- Base Subsidy Reimbursement Rate: \$62.50/day * 22 service days = \$1,375/month
 - If the household fell into the 70%/30% bucket, then:
 - State pays: 70% (\$962.50/mo)
 - Parent pays: 30% (\$412.50/mo)

Under Nevada's new policy, the subsidy sliding fee scale has been discontinued. Now, the family pays the Family Copayment Contribution using a sliding fee scale that is based on household size and income only and is capped at a maximum of 7% per household. Under this policy, the CCDP must calculate the Family Copayment Contribution using the <u>sliding fee scale</u> to determine a dollar amount that is then applied as a cost-share with the CCDP making up the difference to ensure the provider receives the Base Subsidy Reimbursement Rate.

New System (Center-based provider caring for an infant in Clark County; Family Copayment Contribution at 5%):

- Base Subsidy Reimbursement Rate: \$62.50/day * 22 service days = \$1,375/month
- Household Income based on a 4-person family: \$5,000/mo
 - Family Copayment Contribution at 5% of \$5,000: \$250/mo
- Subsidy payment breakdown:
 - State pays: \$1,125/mo
 - Parent pays: \$250/mo

It is important to understand that under both systems, the parent could still owe the provider an Overage, which is the difference between the provider's price and the Base Subsidy Reimbursement Rate. For example, under the new system, if the Center-based provider in Clark County in the example above charged all families a price of \$1,500/month, then on top of the \$250 Family Copayment Contribution required as a cost-share for subsidy participation the family would also be paying the provider an additional \$125 for a total out-of-pocket cost of \$375/mo (this is still less than the \$412.50 the

same family was paying under the old system). Together, the Family Copayment Contribution and the Overage are known as the Monthly Parent/Guardian Responsibility and the amounts are noted on the Child Care Certificate.

6. What is the case renewal process moving forward?

No changes have been made to the renewal/redetermination process at this time.

CCDP is reviewing the current income limits to determine if the program can continue supporting the current eligibility thresholds for initial application and renewal. CCDP is reviewing information and budget projections to determine if eligibility thresholds for initial application and/or renewal can remain at the current level of 85% of State Median Income or if the thresholds will need to be lowered to stay within federal budget limitations.

7. How long will families be waitlisted if they are applying for subsidy?

There is no set time limit to how long a new applicant family may be on the waitlist. The waitlist is reviewed monthly. While the exact duration on the waitlist will vary, all new applications will be processed in chronological order, and families are guaranteed 12 months of subsidy coverage once they become eligible.

Redeterminations and certain Priority Populations are exempt from the waitlist. Per Policy Transmittal 32-24, applications from Priority Population households are exempt from the waitlist, including:

- New Employees of Nevada (NEON) participants;
- Foster/CPS involved households; and
- Households experiencing homelessness.

Other Priority Populations that are not exempt from the waitlist are given precedence if a slot opens, including children covered by the Wraparound Program and households attending an approved substance use disorder treatment program.

8. When/how will child care providers and families be informed about the details of a family's copayment contribution?

On February 7, 2024, CCDP issued Policy Transmittal 01-2024 advising the CCR&R agencies, child care providers, and families that Family Copayment Contributions were resuming beginning April 1, 2024. This information was also shared via letters issued to both child care providers and families on March 27, 2024. The letters were also posted on the consumer education website as <u>Important Updates to The Child Care Subsidy Program</u>. The CCR&R agencies are working diligently to update every active family's Child Care Certificate. Family Copayment Contributions are determined by household size and countable income.

On February 13, 2024, The Children's Cabinet and the Las Vegas Urban League (LVUL) notified providers and families that Family Copayment Contributions would resume beginning April 1, 2024 and provided a link to the updated Family Copayment Contribution <u>sliding fee scale</u> so families could determine what their Family Copayment Contribution would be going forward.

On March 13, 2024, LVUL reissued the information shared on February 13, 2024. On March 20, 2024, LVUL issued the Updated Reinstatement of Family Copayment Contribution Requirements. On March 26, 2024, LVUL held a webinar for child care providers regarding the reinstatement of the Family Copayment Contributions. On April 8, 2024, LVUL shared Policy Transmittal 05-2024 "Updated Reinstatement of Family Copayment Contribution Requirements" with participating families.

The Children's Cabinet also issued the "Updated Reinstatement of Family Copayment Contribution Requirements" on March 19, 2024. In the following week, The Children's Cabinet released "Changes to the Child Care and Development

Subsidy Program" on March 28, 2024. The latest communication released by The Children's Cabinet was July 2, 2024, a statement on "Subsidy Reimbursement Update".

The CCDP, in collaboration with the CCR&Rs, will host a webinar **Tuesday, September 24, 2024** to continue to provide clarification to families and providers and to answer questions. Please keep in touch with your CCR&R for the latest news and look for updates on <u>nevadachildcare.org</u>.

9. What if a family says they cannot afford their Family Copayment Contribution?

Family Copayment Contributions are determined by household size and countable income. Child Care providers are encouraged to work directly with families to develop a repayment agreement that satisfies any outstanding debts to the provider. The CCDP does not intervene in these situations and encourages child care providers to apply the same business policies they would use with a private-pay family.

10. How do providers set up systems to collect the Family Copayment Contribution?

The Child Care Certificate will show the amount of the Family Copayment Contribution the family is required to pay to the child care provider. This is listed on the Child Care Certificate as the "Applied Portion." Child Care providers also receive a reimbursement detail report from their designated CCR&R agency when their monthly reimbursement is processed. The reimbursement detail report also shows the monthly Family Copayment Contribution amount required from the family.

Tips for Child Care Providers on Setting Up Payment Collection Systems

A. Utilize Management Software:

Whenever possible, child care providers should use child care management software to efficiently track Family Copayment Contributions, automate invoicing, and manage client/child records. Families receive their Family Copayment Contribution details on their Child Care Certificates, which are sent to both the parent/guardian of record and their chosen child care provider. The CCR&Rs distribute this information using the contact details provided by the family, ensuring both parties have the necessary information for accurate payment processing. Using a child care management software solution reduces manual errors and saves time by automating and streamlining the payment process.

B. Establish Clear Payment Policies:

Develop and communicate clear payment policies to families, including due dates, accepted payment methods, and late fee policies. Include this information in your enrollment packet and initial meetings.

C. Offer Multiple Payment Options:

It is recommended to provide various payment methods for families, such as cash, check, electronic transfer options, etc. While not all providers can accept electronic payments or credit cards, offering as many options as possible can help ensure timely payments and accommodate different family preferences.

D. Regularly Reconcile Accounts:

Frequently compare your records with the reimbursement detail reports from your designated CCR&R agency to ensure all payments are accurately recorded. Address any discrepancies immediately to maintain financial accuracy.

11. What happens if parents don't pay the Family Copayment Contribution? Can the provider unenroll them?

Child care providers should report non-payment and/or payment issues to their designated CCR&R agency representative via email. Child care providers should also report non-payment to the CCDP by emailing <u>ccdp@dwss.nv.gov</u>.

The Family Copayment Contribution is a federal requirement and an agreement between the child care provider and the enrolled family. It is the provider's responsibility to collect the Family Copayment Contribution and ensure there are no outstanding debts. Every attempt should be made to collect any unpaid balances from the family, however, should the agreement not be followed by the family the child care provider has the right to unenroll the child(ren) from their care due to excessive non-payment(s).

In the event a family is unenrolled by their child care provider, the family's eligibility for child care subsidy will remain in effect until the end of their 12-month determination period. The Child Care Certificate will be updated when the family secures another child care provider.

12. What will happen to me as a CARE Nevada provider if I can't find anybody who receives subsidy to enroll in my program when it opens?

CARE Nevada providers are required to allocate at least one-third of their spaces to children receiving subsidies. If a provider is unable to enroll children receiving subsidy benefits due to the waitlist, they are permitted to fill those spots with non-subsidy children. This policy will be communicated to all CARE providers and will be updated on the CARE Nevada Program FAQ.

13. How does the Family Copayment Contribution work when a child transfers to a new provider? Will both child care providers be able to collect a payment?

The Family Copayment Contribution, referred to as the Applied Portion, is shared between known child care providers serving an enrolled family. Due to the current structure of the Nevada Child Care System, if an enrolled child transfers providers after payment has been processed, the new provider will receive their applied portion in the subsequent administrative month.

This process is subject to ongoing refinement to ensure efficiency and accuracy in the transition between providers. The CCDP and CCR&R agencies are committed to maintaining improved communication with child care providers to address issues as they arise and implement policy and procedure improvements effectively.

14. What happens when there is a change to a Family Copayment Contribution due to a change in income or renewal? What amount will the family pay for that month?

Per federal regulations, the Family Copayment Contribution will remain the same for the families' entire 12-month certification period. The Family Copayment Contribution cannot be increased during the certification period. Family Copayment Contributions can only increase upon renewal (assuming there is a change in income) for a new 12-month certification period. When a change occurs in the Family Copayment Contribution due to changes in family income or during the renewal process, it is crucial to maintain consistency and clarity for families. Throughout the 12-month certification period, the Family Copayment Contribution will remain unchanged to provide financial stability for families.

During the renewal process, all aspects of eligibility, including household size and countable income, are reviewed. Upon renewal, a new Family Copayment Contribution is calculated based on the updated information provided by the family and as verified by their case manager. The new Family Copayment Contribution is effective at the beginning of their new 12-month certification period, ensuring that families are aware of any adjustments and can plan accordingly.