

Child Care Authentication Guide

Unemployment Insurance Early Warning

Responsibility: Financial Aid Support Center

Frequency: Twice a month

The report seeks to identify and assess customers receiving financial aid for child care who are potentially ineligible for child care services because they filed an unemployment insurance (UI) claim indicating they are not working or have had a reduction in work hours.

The objective is to prevent overpayments by identifying customers before their interruption period expires.

A customer identified in the report is not necessarily ineligible for services. Potential financial aid for child care eligibility issues are resolved by verifying the customer's work and/or employment/training status.

1. Upon receipt of the ***Unemployment Insurance Early Warning Report***, review customer's file to determine if information is correct and whether there is an active/open case, **head of household** and if the customer is employed and/or enrolled in training. Review the ***Intake Common – Family - Income tabs, Program Detail - Reason for Care*** field and ***Income*** tab and enter any missing correct information.
2. Compare the income information in TWIST and the information from the UI Early Warning report. Determine the last day the customer worked from the UI Early Warning report and compare against the information in TWIST. If information in the customer's file and TWIST record do not match and no activity interruption has been entered, mail the customer a ***Discrepancy*** letter indicating we need updated information regarding his/her employment and/or training status along with appropriate documentation (i.e. check stub, school schedule, etc.). ***If the customer previously reported a change in income and/or new employment, verify the information has been documented in TWIST and a change in income/employment has been processed. A Discrepancy letter is not required to be sent to the customer.***
3. Enter a three-month interruption period beginning the first day after the last date of employment reported to UI. If the customer does not find employment or enter into a training program by the end of the three-month period, staff must end the service. Notify the customer of the interruption period and requirements to continue care.
4. If customer submits requested information, update TWIST record as indicated in steps 1 and 3 above.
5. ***If the customer's last date of employment is greater than 90 days of the last employment date reported to UI, call the customer and confirm their status. If the customer is working or in an activity, request documentation. Customer has 3 business days to submit the requested information. Staff will explain to the customer they will be receiving a 15 day closure letter, and that the customer must submit the requested information, as quickly as possible to continue receiving child care. If the customer is not in an activity, did not submit the requested documentation within 3 business days or was not able to be reached Staff will issue the 15-day closure letter and schedule close the referral and child care program detail to close on the 15th day.***
6. If during the review, staff suspects questionable information and/or potentially fraudulent activity, staff must immediately report this issue to the Financial Aid Payment Office (Payment Office) via ***FACS*** within one workday after identifying the issue.
7. ***In all instances, staff must update TWIST Counselor Notes*** regarding actions taken and resolution of the ***Unemployment Insurance Early Warning Report***.
8. Staff must note all actions taken for each customer in the designated column on the ***Unemployment Insurance Early Warning Report***, including when discrepancies are not found.
9. ***All actions must be completed and a final report must be submitted to the Board designated staff within 45 calendar days from the date the report is received.***

Actions include but is not limited to: (a) referral for fact finding, (b) initiating an interruption period, (c) determined eligible, no action required.

Identity Mismatch

Responsibility: Financial Aid Support Center

Frequency: Weekly

The report highlights customers (parent, child, or other family member) who are receiving financial aid for child care and may have identity mismatches as their information is verified electronically with federal databases.

Four data elements are used in the matching process:

- Social Security Number (SSN)
- Name
- Date of Birth
- Gender

- If all four data elements match, the individual's identity is confirmed as valid.
- If there are any mismatches, a mismatch report identifies the customers requiring verification of identity.

1. Upon receipt of the ***Identity Mismatch Report***, staff must compare the information in TWIST against the documentation in customer's file containing the four data elements to determine whether a data entry error in TWIST caused the mismatch.
2. If the file review confirms a data entry error occurred for mismatches on Date of Birth, First Name and Last Name (Surname), SSN, or Gender, staff must enter the correct information into TWIST using the ***Intake Common*** menu on the ***Customer Information*** screen.
3. The mismatched data will remain in the report until a new Program Detail is created using the information in the ***Intake Common*** menu.
4. If a date of birth for a child of a customer receiving financial aid for child care is incorrect and causes the provider to be paid at an incorrect reimbursement rate, staff must **close** the Program Detail and create a **new** Program Detail with the correct information.
5. If the file review confirms the data was entered into TWIST correctly, but the data elements on the mismatch report do not correspond, staff must mail the customer a Discrepancy letter and request any applicable documentation as indicated on the Acceptable Documentation Staff Guide on Page 5.
6. If customer does not respond to our Discrepancy letter within 15 calendar days, staff must refer the issue to the Payment Office via ***FACS*** for fact finding.
7. If the customer submits the requested information, staff must update the customer's information in TWIST as indicated in steps 2, 3, and 4 above.
8. If during a mismatch review, staff discover questionable information and/or potential fraud, such as a SSN is being used by more than one individual or employer, staff must immediately report this issue to the Payment Office via ***FACS*** within one workday after identifying the discrepancy.
9. In all instances, staff must update TWIST Counselor Notes regarding actions taken and resolution of the ***Identity Mismatch Report***.
10. Staff must note all actions taken for each customer in the designated column on the ***Identity Mismatch Report***.
11. All actions must be completed and a final report must be submitted to the Board designated staff **within 30 calendar days** from the date the report is received.

****Upon receipt of the next report staff should review the names of those listed to determine the reason the individual continues to be listed and take appropriate***

action.

Child Care Income

Responsibility: Financial Aid Support Center

Frequency: Quarterly

The report identifies customers receiving financial aid for child care who were potentially ineligible for the financial aid due to parental/custodial changes or underreporting of income.

A customer identified in the report is not necessarily ineligible for services; the issue of eligibility can be established only after a thorough review of the customer's file and may involve contacting the customer for further information.

1. Upon receipt of the *Child Care Income Report*, review customer's file to reassess his/her eligibility for financial aid (a) at the time of the request for financial aid for child care services or (b) current eligibility.
2. Compare the information from the *Child Care Income Report* and the customer's TWIST file to determine if there are any discrepancies or eligibility issues. Staff must enter information in case notes using the subject line: Income Exception (qtr and yr). The note must include your analysis.
3. If there aren't any discrepancies and the customer's eligibility, currently or at the time of the request for financial aid is validated, no further action is necessary.
4. If there are discrepancies or eligibility issues, mail the customer a Discrepancy letter indicating we need updated information regarding his/her employment and/or training status along with appropriate documentation. (i.e. check stub, school schedule, etc.). The customer must respond to the Discrepancy letter within 15 calendar days from the date the letter was mailed. Staff must enter a case note indicating the last day of a response to the Discrepancy letter. The note must include your analysis.
5. If customer does not respond to the Discrepancy letter within 15 calendar days, refer the issue to the Payment Office via *FACS* for fact finding within five business days.
6. If customer submits requested information and is determined ineligible due to a permanent change in employment or earnings causing the customer to be over 85% SMI, issue the 15-day termination letter, close the referral and the Child Care Program Detail, *and send 2450 to the provider*. They must also provide the opportunity to appeal (Appeal Form A1). Refer the customer to the Payment Office via *FACS* for fact finding.
7. If during a review, staff suspects potentially fraudulent activity, staff must immediately report this information to the Payment Office via *FACS* the same workday after identifying the issue.
8. If customer submits requested information and there are no issues or all issues are resolved, no further action is necessary.
9. In all instances, staff must update TWIST Counselor Notes regarding actions taken and resolution of the *Child Care Income Exception Report*.
10. Staff must note all actions taken for each customer in the designated column on the *Child Care Income Exception Report*.
11. All actions must be completed and a final report must be submitted to the Board designated staff **within 45 calendar days** from the date the report is received.

Child Care Work and Training

Responsibility: Financial Aid Support Center

Frequency: Twice a month

The report detects customers receiving financial aid for child care who were potentially ineligible for the financial aid due to not meeting the low-income, work and/or training eligibility requirement.

A customer identified in the report is not necessarily ineligible for services; the issue of eligibility can be established only after a thorough review of the customer's file and may involve contacting the customer for further information.

1. Upon receipt of the *Child Care Work and Training Report*, staff must review customer's file to reassess the customer's eligibility for financial aid at the time of the initial request for child care assistance.
2. Staff must compare the information from the *Child Care Work and Training Report* and the customer's TWIST file to determine if there are any discrepancies or eligibility issues.
3. If there aren't any discrepancies and the customer's eligibility at the time of the request for financial aid is validated, no further action is necessary.
4. If there are discrepancies or eligibility issues, staff must mail the customer a Discrepancy letter requesting additional information regarding their employment and/or training status along with appropriate documentation. (i.e. check stub, school schedule, etc.).
5. If the customer does not respond to our Discrepancy letter within 15 calendar days, staff must refer the issue to the Payment Office via *FACS* for fact finding within five business days.
6. If the customer submits requested information and there are no issues or all issues are resolved, no further action is necessary.
7. If customer submits requested information and we identify an eligibility issue due to staff error, the designated Board staff must be notified within one workday.
8. If during a review, staff suspects potentially fraudulent activity, staff must immediately report this information to the Payment Office via *FACS* the same workday after identifying the issue.
9. In all instances, staff must update TWIST Counselor Notes regarding actions taken and resolution of the *Child Care Work and Training Report*.
10. Staff must note all actions taken for each customer in the designated column on the *Child Care Work and Training Report*.
11. All actions must be completed and a final report must be submitted to the Board designated staff **within 45 calendar days** from the date the report is received.

Responsibility: Financial Aid Payment Office

1. Staff must record an issue identifying questionable information and potential fraudulent activity in the Program Integrity Reporting Tracking System (PIRTS) within two business days of receipt of potentially fraudulent activity.
2. The Financial Aid Payment Office must conduct fact finding within 60 days of receipt of an issue and determine if the customer:
 - a. Committed fraud
 - If the Payment Office determines the customer did commit fraud, the Payment Office will submit this determination to Board Staff for action.
 - i. If the Board does not agree with the determination of fraud, Payment Office staff will record this outcome in PIRTS.
 - ii. If Board Staff concurs with the determination of fraud, Board Staff will notify the Payment Office which will:
 - 1) Notify the customer, provide an opportunity to appeal (Appeal Form A1) and begin recoupment efforts.
 - 2) Notify the Financial Aid Support Center (Support Center) via FACS. The Support Center must, within 24 hours, end the referral, terminate the Program Detail for child care financial aid and send 2450 to the provider.
 - b. Did not commit fraud
 - If the Payment Office determines the customer did not commit fraud, record this outcome in PIRTS and ~~notify the Financial Aid Support Center via FACS~~; the customer remains eligible. **Document actions in TWIST Counselor Notes.**
 - If the Payment Office determines the customer did not commit fraud but is ineligible due to a permanent change in employment or earnings causing the customer to be over 85% SMI, Payment Office staff must:
 - Record this outcome in PIRTS.
 - Notify the Financial Aid Support Center via FACS.
 - Support Center must, within 24 hours, **issue the 15-day termination letter, close the referral and the Child Care Program Detail, and send 2450 to the provider.** They must also provide the opportunity to appeal (Appeal Form A1).
3. The Payment Office will update TWIST Counselor Notes and the FAMS record regarding recoupment status and any actions taken.
4. **If an identity mismatch affects the customer's eligibility for child care financial aid, the customer is ineligible to receive child care financial aid during an appeal.**

***If staff needs additional time to complete the determination, a request should be made to Board staff in writing requesting additional time prior to reaching 60 days.**