



May 12, 2009

Mr. Kira Pospesel, Commissioner
Greene County Department of Social Services
411 Main Street
P.O. Box 528
Catskill, NY 12414-1716

New York State
Office of
Children & Family
Services

www.ocfs.state.ny.us

Dear Commissioner Pospesel:

This letter is to inform you that the child care section found in the administrative component of your Annual Plan Update 2008-2009 was approved on May 12, 2009. The child care section became effective on May 12, 2009.

David A. Paterson
Governor

Gladys Carrión, Esq.
Commissioner

This approval is being issued separate from the approval of other sections of your plan in order to accommodate your county's need to implement the child care services provisions. A letter approving the remaining sections of your plan will be sent upon their approval.

If you have any questions about this approval or the child care section found in your Annual Plan Update 2008-2009 please contact Ms. Amy Ryan, (518) 474-9620 or by e-mail at Amy.Ryan@ocfs.state.ny.us.

Capital View Office Park
52 Washington Street
Rensselaer, NY 12144

Sincerely,

Janice M. Molnar
Deputy Commissioner
Division of Child Care Services

Cc: Fran DelGaudio



APPENDIX G-1

CHILD CARE SECTION
DATED 2007-2009

County: Greene

I. Administration (Required Section)

Describe how your district is organized to administer the child care program, including any functions that are subcontracted to an outside agency.

1. Identify the unit that has primary responsibility for the administration of child care for:

Public Assistance Families: **Day care employment unit**

Transitioning Families: **Day care employment unit**

Income Eligible Families: **Day care employment unit**

Title XX: **Day care employment unit**

Indicate the use of New York State Child Care Block Grant (NYSCCBG) Funds.

FFY 06-07 Rollover Funds (<i>this amount is available from the NYSCCBG ceiling report in the claiming system</i>)	\$91,876
Estimate of FFY 07-08 Rollover Funds	\$129,360
Estimate of Flexible Funds for Families (FFFS) for child care subsidies	\$0
NYSCCBG Allocation for SFY 08-09	\$497,655
Estimate of Local Share	\$27,000

Total Estimated NYSCCBG Amount: \$654,015.00

\$654,015.00

- A. Subsidy **\$474,015.00**
- B. Other program costs (excluding subsidy) **\$0**
- C. Administrative costs **\$180,000.00**

3. Does your district have a contract or formal agreement with another organization to perform any of the following functions?

<u>Function:</u>	<u>Organization:</u>	<u>Amount of Contract:</u>
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Eligibility screening

Function

Assistance in locating care

Child Care Information
Systems

x Determining if legally-
exempt providers meet
State approved additional
local standards (if
applicable)

**Child Care Council of
Columbia/Greene**

\$33,000.00

Other

County: Greene

APPENDIX G-3

III. Reasonable Distance, Very Low Income, Family Share, Case Closings and Openings, and Fraud and Abuse Control Activities_ (Required Section)

Reasonable Distance

Your district is required to define reasonable distance based on community standards for determining accessible child care.

The following defines "reasonable distance": **“Child care is accessible when travel distance is no more than one hour between the site of an appropriate child care provider and the participant’s home, the child’s school or the participant’s employment/work activity location. The one-hour of travel is defined as any means of transportation including, but not limited to, walking, public transportation, shuttle service or use of a personal vehicle. Appropriate child care will be considered available when a Temporary Assistance to Needy Families (TANF) recipient identifies a provider on their own or the agency provides a referral to the Child Care Council resulting in a minimum of two referrals meeting the criteria above.”**

Describe any steps/consultations made to arrive at your definition: **This definition was reached after consultation and discussion with representatives from the Greene County Temporary Assistance Unit, Department of Labor, Child Care Council and Community Action Transportation Unit.**

Very Low Income

Very Low Income is defined by each district and is used in determining priorities for child care benefits.

Very Low Income is defined as **200%** of the State Income Standard.

Family Share

Family share is the weekly amount paid towards the costs of the child care services by the child’s parent or caretaker. In establishing family share, your district must select a percentage from 10% to 35% to use in calculating the family share. The family share of child care is calculated by applying the family share percentage against the amount of the family’s annual gross income that is in excess of the State Income Standard divided by 52.

Family Share Percentage selected by our district **35%**.

Case Closings (select one or two)

1. The district must describe below how priority is given to federally mandated priorities and describe local priorities. If all NYSCCBG funds are committed, the district will discontinue funding to those families that have lower priorities in order to serve families with higher priorities. Described below is how the district will select cases to be closed in the event that there are insufficient or no funds available.

Should Day Care funding become limited or unavailable, Greene County will close the following cases:

- a. **Family Income 200%-225%**
- b. **Family Income 175%-200%**
- c. **Family Income 150%-175%**
- d. **Family Income 125%-150%**
- e. **Family Income 100%-125%**

- f. **Cases that have children with special needs. (Note: Family Income could be between 100% and 225%)**

2. The district has not established priorities beyond the federally-mandated priorities. If all NYSCCBG funds are committed, case closings for families which are not eligible under a child care guarantee and are not a federally-mandated priority must be based on the length of time in receipt of services. The length of time used to close cases may be based either on the shortest or longest time receiving child care services but must be consistent for all families. The district has chosen to close cases based on:

- shortest time receiving child care services
- longest time receiving child care services

Case Openings

The district must describe below how priority is given to federally mandated priorities and how the district will select cases to be opened in the event that there are insufficient funds available.

- a. **Cases that have children with special needs. (Note: Family Income could be between 100% and 225%)**
- b. **Family Income 100%-125%**
- c. **Family Income 125%-150%**
- d. **Family Income 150%-175%**
- e. **Family Income 175%-200%**
- f. **Family Income 200%-225%**

Fraud and Abuse Control Activities

The district must identify below the criteria it will use to determine which child care subsidy applications suggest a higher than acceptable risk for fraudulent or erroneous child care subsidy payment and procedures for referring such applications to the district's front end detection system.

County Greene County Date _____

FRONT END DETECTION SYSTEM (FEDS) PLAN OF OPERATION

If an application has one or more of the indicators checked below on the district's approved FEDS plan, and the eligibility worker is not confident that an indicator has been explained or supported adequately, the application must be referred for a FEDS investigation. The wording of each indicator must appear exactly on the FEDS plan as well as the FEDS referral process/form.

Section 1-State Mandated Indicators

all district plans must include these indicators:

- Financial obligations are current, but stated expenses exceed income *without a reasonable explanation***
- Working off the books (currently or previously)**
- Supported by loans or gifts from family/friends**
- Application is inconsistent with prior case information**
- Prior history of denial, case closing, or overpayment *resulting from an investigation.***

Section 2 – State-Approved Optional Indicators

This section may be left blank if a county chooses not to select any of these optional indicators for its FEDS process. If the district chooses to include any or all of these optional indicators in its plan, eligibility workers must also refer to FEDS any applications with these indicators:

- No absent parent information or information is inconsistent with application
- No documentation to verify identity or documentation of identity is questionable
- Landlord does not verify HH composition or provides information inconsistent with application
- Self-employed but *without adequate business records* to support financial assertions
- Alien with questionable or no documentation to substantiate immigration status
- Documents or information provided are inconsistent with application, such as different name used for signature or invalid SSN
- P.O. Box is used as a mailing address *without a reasonable explanation*, e.g., high crime area
- Primary tenant with no utility bills (e.g., phone or electric) in his/her name
- Children under the age of six with no birth certificates available
- Unsure of own address

Section 3 – State-Approved County-Specific Indicators

Eligibility workers are not allowed to refer cases based on an “other” box that they fill in for each FEDS referral. Indicators listed and checked here must be pre-approved by the State and must be pre-filled on the district’s FEDS referral process/form. This section may be left blank if a district chooses not to create any county-specific indicators for their FEDS process. Once the State approves this indicator, eligibility workers must also refer to FEDS any applications with these indicators:

- (X) County-Specific Indicator: **Moved into Greene County within the last six months**
- (XI) County-Specific Indicator: **Homeless at time of application**

Section 4 – Description of FEDS Process - **Please describe your FEDS process:**

a. Specify what program areas will use FEDS:

X TA X FS X Medicaid X CC _____ Other (specify)

b. Describe how an application will be referred by the eligibility worker to the investigative unit. Include if this is a manual, e-mail or automated process, and if there is eligibility supervisory review. OTDA strongly encourages eligibility supervisory review.

FEDS criteria are reviewed at each eligibility interview by the eligibility examiner. Appropriate FEDS referral is completed and all applicable documentation is attached. Eligibility examiner signs and dates referral. Supervisor then reviews, signs and dates referral and delivers it to the Fraud Unit.

c. Describe how the investigative unit logs and tracks the referral, as well as how it processes it (i.e., home visit, collateral contact, office interview, etc.).

Resource Consultant logs referral, assigns and tracks for timeliness. Investigator must complete the investigation within 10 days. The investigation may include a home visit and collateral contacts. The investigator will complete a written response on the reverse side of the referral and attach all appropriate documentation. When extenuating circumstances exist and the investigation is not completed in ten days, the investigator will review with Resource Consultant and investigation period will be extended, if approved by Eligibility Supervisor. When investigation is completed, investigator gives completed referral to the Resource Consultant who signs, dates, and logs results. Resource Consultant then gives completed referral to the Eligibility Supervisor.

d. Specify the targeted time frames for reporting investigative results back to the eligibility worker for final determination.

The investigator must complete the investigation within 10 days.

e. If your district contracts out for investigations, such as with a local sheriff’s department, explain this process and staffing and identify the contractor.

Our district does not contract out for investigations.

f. Describe how and when the investigative unit is informed of the final action taken on the application, for inclusion in the FEDS monthly report.

The Eligibility examiner completes the back of the FEDS referral upon case disposition and the Supervisor returns the copy to the Fraud Unit as case is completed. Resource Consultant logs results for inclusion in the monthly FEDS report.

g. Attach copies of:

- Any letter used to inform an applicant of a FEDS interview or home visit
- Any letter used to inform an applicant that they may be investigated for FEDS
- The FEDS referral form
- Any other FEDS form that passes between eligibility and investigations, such as a report of investigation

WE DO NOT SEND THE APPLICANT A LETTER PRIOR TO AN INTERVIEW OR HOME VISIT.

This Plan was completed by (please print): ___Mary D. Zindell

Title: Resource Consultant_____

Email Address: **mary.zindell@dfa.state.ny.us** Phone: **_518-719-3730**_____



**NEW YORK STATE
OFFICE OF TEMPORARY AND DISABILITY
ASSISTANCE
Riverview Center, 4th Floor
40 N. Pearl Street
Albany, New York 12243**

**George E. Pataki
Governor**

**Robert Doar
Commissioner**

July 10, 2006

Ms. Mary Zindell
Resource Consultant
Greene County DSS
PO Box 528, 411 Main Street
Catskill, NY 12414

Dear Mary:

This letter will serve as approval of Greene County's revised FEDS plan for Temporary Assistance and Food Stamps and also for the EVR plan for Temporary Assistance and Food Stamps. We will forward these approved plans to State DOH for the Medicaid portions of these plans and State OCFS for the Child Care portions of your plans, and you will hear from those agencies directly.

Regarding implementation of your revised FEDS and EVR plans, we encourage you to continue to maintain a good relationship between your eligibility workers and supervisors and investigators and to share the plans with them. In order to be successful, the FEDS process must have eligibility workers, supervisors and investigators who understand the function of each indicator, as well as the FEDS process itself. We offer the following tools for Greene County's staff, to assist in understanding and maintaining a good FEDS process:

- The FEDS ADM, 05 ADM-08
- The FEDS pc learning module, which can be accessed through the following link:
www.trainingspace.org
- The Fall 2006 NYWFIA regional meetings (FEDS will be discussed).

Administrative Component-DSS
2008-09 Greene County APU

5/12/09

As you know, we recently converted to an automated report for FEDS—please call me if you have any questions about what to report, or anything else regarding FEDS. I can be contacted at (518) 402-0127 or at maria.schollenberger@otda.state.ny.us.

We appreciate very much the time and effort you put into revising your plan, as well as your patience during the review process. We also thank you for helping to maintain the integrity of Temporary Assistance and Food Stamps in New York State.

Sincerely,

MS /s/

Maria Schollenberger
FEDS Project Director

Greene County Attachments
cc: Commissioner Pospesel
Jean Shannon, DOH
David Dorpfeld, OCFS

CASE NAME	SS #	CASE #	TA , SN , FS , MA, CHILD CARE
_____	# _____	# _____	_____
			(Circle which applies)
ADDRESS	DIRECTIONS		
_____	_____	_____	
_____	_____	_____	

HOUSEHOLD COMPOSITION	D.O.B.

YEAR	COLOR	VEHICLE (TYPE/MODEL)

FEDS

INCOME/RESOURCE	
	FINANCIAL OBLIGATIONS ARE CURRENT, BUT STATED EXPENSES EXCEED INCOME <i>WITHOUT A REASONABLE EXPLANATION</i>
	WORKING OFF THE BOOKS (<i>CURRENTLY OR PREVIOUSLY</i>)
	SELF-EMPLOYED BUT <i>WITHOUT ADEQUATE BUSINESS RECORDS</i> TO SUPPORT FINANCIAL ASSERTIONS

IDENTITY STATUS	
	NO DOCUMENTATION TO VERIFY IDENTITY OR DOCUMENTATION OF IDENTITY IS QUESTIONABLE
	DOCUMENTS OR INFORMATION PROVIDED ARE INCONSISTENT WITH APPLICATION, SUCH AS DIFFERENT NAME USED FOR SIGNATURE OR INVALID SSN
	ALIEN WITH QUESTIONABLE OR NO DOCUMENTATION TO SUBSTANTIATE IMMIGRATION STATUS

SUPPORTED BY LOANS OR GIFTS FROM FAMILY / FRIENDS

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RESIDENCE	
	PO BOX USED AS A MAILING ADDRESS <i>WITHOUT A REASONABLE EXPLANATION</i> , e.g., HIGH CRIME AREA
	LANDLORD DOES NOT VERIFY HOUSEHOLD COMPOSITION OR PROVIDES INFORMATION INCONSISTENT WITH APPLICATION
	PRIMARY TENANT WITH NO UTILITY BILLS (e.g., PHONE OR ELECTRIC) IN HIS / HER NAME
	UNSURE OF OWN ADDRESS
	OTHER: MOVED INTO GREENE CO. WITHIN THE LAST 6 MONTHS
	OTHER: HOMELESS AT TIME OF APPLICATION

OTHER	
	CHILDREN UNDER THE AGE OF SIX WITH NO BIRTH CERTIFICATES AVAILABLE
	NO ABSENT PARENT INFORMATION OR INFORMATION IS INCONSISTENT WITH APPLICATION
	PRIOR HISTORY OF DENIAL, CASE CLOSING, OR OVERPAYMENTS <i>RESULTING FROM AN INVESTIGATION</i>

EVR

(APPLICATION FOR TA/FS/MA/CC WHO DO NOT MEET A FEDS INDICATOR – RECERTS WHERE RECIPIENTS' EXPENSES EXCEED INCOME AND BILLS ARE PAID TO DATE – TA/FS SANCTIONED EMPLOYABLES)

EVR INVESTIGATION REQUEST

APPLICATION / RECERTIFICATION DATE	
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(SPECIFY ALLEGATION ON REVERSE)

FRAUD

FRAUD INVESTIGATION REQUEST

The district must describe below its sampling methodology used to determine which cases it will seek verification of an applicant or recipient's continued need for child care including, as applicable, verification of participation in employment, education or other required activities. **Greene County recertifies Day Care cases every 6 months and conducts 100% review of cases. At the time of application or recertification verification of the parents wages, hours worked, or school attendance records are requested and verified with day care attendance records.**

The district must describe below its sampling methodology used to determine which child care providers of subsidized child care services they will review for the purpose of comparing the child care providers attendance forms for children receiving subsidized child care services and any child and adult care food program inspection forms to verify that child care was actually provided on the days listed on the attendance forms. **Greene County will contact Child Care Council of Columbia-Greene County monthly to determine which of the 11 Providers has subsidy children and will match a minimum of 10 CACFP providers inspection records against the attendance records submitted in the review month for subsidy payment.**

APPENDIX G-4

ii. District Options (Required Section)

Districts have certain flexibility to administer the child care subsidy program to meet local needs. Check which options that your district wishes to include in your county plan. Complete attachments for any area(s) checked.

1. Our district has identified local priorities in addition to the federal priorities (complete Appendix G-5).
2. Our district has chosen to establish funding set-asides for NYSCCBG (complete Appendix G-6).
3. Our district is using Title XX funds for the provision of child care services (complete Appendix G-7).
4. Our district has chosen to establish additional local standards for child care providers (complete Appendix G-8).
5. Our district has chosen to make payments to child care providers for absences (complete Appendix G-9).
6. Our district has chosen to make payments to child care providers for program closures (complete Appendix G-10).
7. Our district has chosen to pay for transportation to and from a child care provider (complete Appendix G-11).
8. Our district has chosen to pay up to a 15% higher than the applicable market rates for regulated child care services that have been accredited by a nationally recognized child care organization (complete Appendix G-11).
9. Our district has chosen to pay up to 15% higher than the applicable market rates for non-traditional hours (complete Appendix G-11).
10. Our district has chosen to pay for child care services while a caretaker who works the second or third shift sleeps (complete Appendix G-11).
11. Our district has chosen to make payments to child care providers who provide child care services, which exceed 24 consecutive hours (complete Appendix G-12).

12. Our district has chosen to include 18, 19 or 20 year olds in the Child Care Services Unit (complete Appendix G-12).

APPENDIX G-4 (continued)

13. Our district is seeking a waiver from one or more regulatory provisions. Such waivers are limited to those regulatory standards that are not specifically included in law (complete Appendix G- 12).
14. Our district has chosen to pay for breaks in activity for low income families (non public assistance families, complete Appendix G-12).
15. Our district has chosen to use local equivalent forms such as, but not limited to, child care application, client notification and/or legally exempt enrollment forms (attach copies of the local equivalent forms your district uses).

Any previous approvals for local equivalent forms will not be carried forward into this county plan. Therefore, any local equivalent forms a district wishes to establish or renew must be included in this plan and will be subject to review and approval by OCFS.

APU Instructions: Only those local equivalent forms that were not already approved in the 2007-09 CFSP need to be included.

APPENDIX G-9

iii. Payments to child Care Providers for Absences

The following providers are eligible for payment for absences:
(Check any that are eligible)

- Day Care Center Legally Exempt Group
 Group Family Day Care School Age Child Care
 Family Day Care

Our district will only pay for absences to providers with which the district has a contract or letter of intent. Yes No

Base period selected (check one) 3 months x 6 months

Number of absences allowed during base period:

Period	Routine Limits (# of days)	Extenuating Circumstances (# of days)	Total Number of Absences Allowed (# of days)
In a month	4	3	7
Base period	24	18	42

List reasons for absences for which the district will allow payment:

Child is absent due to illness which includes caretaker/relative.

List any limitations on the above providers' eligibility for payment for absences:

Note: Legally exempt family child care and in-home child care providers are **not** eligible to receive payment for absences.

APPENDIX G-12

**CHILD CARE EXCEEDING 24 HOURS, CHILD CARE SERVICES UNIT,
WAIVERS, BREAKS IN ACTIVITIES**

Child Care Exceeding 24 Hours

Child care services may exceed 24 consecutive hours when such services are provided on a short-term emergency basis or in other cases where the caretaker's approved activity necessitates care for 24 hours on a limited basis.

Describe any limitations for payment of child care services that exceed 24 consecutive hours.

N/A

Child Care Services Unit

The Child Care Service Unit is the basis upon which a district will determine which household and/or family members should be counted in determining family size and countable family income.

Our district will include the following in the Child Care Services Unit (check which ones apply).

18 year old 19 year old 20 year old

-OR-

Our district will include only the following in the Child Care Services Unit when it will benefit the family (check which ones apply).

18 year old 19 year old 20 year old

Describe the criteria your district will use to determine whether or not an 18, 19 or 20 year old is included in the Child Care Services Unit.

Waivers

Districts have the authority to request a waiver of any regulatory provision that is non-statutory. Describe and justify why your district is requesting a waiver.

Breaks in Activities

Districts may pay for child care services for low income families during breaks in activities for a period not to exceed two weeks or for a period not to exceed one month where child care arrangements would otherwise be lost and the subsequent activity is expected to begin within that period (check one).

two weeks four weeks

Districts may provide child care services while the caretaker is waiting to enter an approved activity or employment or on a break between approved activities. The following low income families are eligible for child care services during a break in activities (check any that are eligible):

entering an activity waiting to begin employment break between activities