

Care 4 Kids Regulations Analysis

Prepared by Sherry Linton, Connecticut Association for Human Services

Issue(s)	C4K Regulation, p.#	Authority to Change ^[1]	Recommendations	Notes
Use of the terms Family, Assistance Unit, and Household	Definitions: p. 1,3 Sec. 17b-749-03: Individuals in Family: p.10, 11	DSS -regulation amendment	Need to minimize confusion with terms and eligibility.	Why the need to use varying terminology that magnifies eligibility confusion.
Unnecessary reporting of household circumstances	Sec. 17b-749-02: Responsibilities of Parents and Providers: p.7	DSS - regulation amendment	Add language to regs to require reporting of changes only when it would affect eligibility or payment status.	Let's minimize the possibility of requiring reporting of info that only serves to flood the system and disrupt payments.
Application disclosure to landlord, employer, or third party	Sec. 17b-749-02: Safeguarding Information: p.9	DSS - regulation amendment	Regs to include language that applicant will be notified prior to third party disclosures to maintain confidentiality.	
Need to streamline access to benefit programs	Sec. 17b-749-02: Safeguarding information: p.9	DSS discretion	Establish a uniform application process for all benefit programs.	The opportunity to utilize electronic applications
Eligibility for care while in an approved employment activity dependent on TFA status.	Sec. 17b-749-04: Need for Care: p.17	Requires Legislation	Applicant involved in employment services should be eligible irrespective of TFA status.	Do we want to create a disincentive to families who have opted not to utilize cash assistance?
Assistance shall be available only during hours the parent or family member is participating in an approved activity	Sec. 17b-749-04: Need for Care: p.17	DSS - regulation amendment	Families participating in approved activities during irregular hours should be allotted sufficient care hours for the purpose of sleep.	Parents not allotted appropriate hours of care for the purpose of sleep may not be able to provide adequate care.
Higher education not considered an approved activity for eligibility	Sec. 17b-749-04: Need for Care: p.17	DSS - TANF Dependent	Approved activities should be expanded to include higher education.	Low income families working toward higher education need to access care as they would if in a training program.

Issue(s)	C4K Regulation, p.#	Authority to Change ^[1]	Recommendations	Notes
Spouse or parent availability to provide care	Sec. 17b-749-04: Need for Care: p.18	DSS - regulation amendment	Circumstances under which a parent or spouse is incapable of providing care should be expanded.	One is considered incapable of providing care as determined by whom and under what conditions?
Burden on a parent working at home to prove that they are unavailable to care.	Sec. 17b-749-04: Need for Care: p. 18	DSS - regulation amendment	If a parent is gainfully employed in home setting, regs should allow use of care.	How do parents working at home meet the burden of proof that they are unavailable to provide care?
Notification by Care 4 Kids Administrator of changes in eligibility or benefits to be completed within ten days.	Sec. 17b-749-07: Notice Requirements: p.27 Sec. 17b-749-19: Changes in Eligibility or Benefits: p. 70	Current practice is calendar days	Regulations to state that notifications of changes in eligibility or benefits are to be completed and mailed within ten calendar days.	Does 10 day notification window refer to 10 business or calendar days?
Payment Rates	Sec. 17b-749-13: Payment Rates: p.52	Requires Legislation	Payment rates to reflect the biennial Market Rate Survey for licensed providers and the current state minimum wage for unlicensed providers.	75% percentile of current market rate is considered to provide reasonable access to care. CT is out of compliance with minimum wage requirements.
Establishment of payment incentives	Sec. 17b-749-13: Payment Rates: p.54 Payment Incentives for Accreditation and Professional Development: p. 55	Funding dependent. Provisions already exist in regulation.	Regs to outline acceptable incentives more clearly.	Incentive should be tied to the new Quality Rating System.
Payment to be authorized up to ten days prior to activity start date if the parent is required to pay for services before activity starts to secure a slot	Sec. 17b-749-14: Payment Authorization Period: p.58	Current practice	Monitoring process to ensure that payments are being issued to licensed providers up to ten days prior to activity start date when requested.	To what extent is this happening? Presumptive Eligibility is a vehicle to expedite required down payments to secure a slot and maximize access to care.

Issue(s)	C4K Regulation, p.#	Authority to Change ^[1]	Recommendations	Notes
Parents entitled to request additional payments for an eligible child with special needs	Sec. 17b-749-16: Supplemental Payments: p.65-66	Current Practice	Regulations to provide a reasonable schedule for verifying special needs of children identified with long term disabilities. Regulations to offer more expanded eligibility classification for children with special needs.	Families with children with verified long term disabilities should not have to establish need for supplemental payments repeatedly. Are autistic children classified as eligible for care?
Notice of eligibility termination	Sec. 17b-749-19: Termination of Program Eligibility: p.70	Current Practice. Notice is automatically generated to both parties.	Prompt notice to be sent to providers in addition to parent/guardian informing of certificate termination.	
Initiation of payments to new provider	Sec. 17b-749-19: Determination of Provider Ineligibility: p.71	Unable to comment	Process to be improved for terminating payments to previous provider to minimize penalizing new provider.	
Parents shall be entitled to request supplemental payments for increased care.	Sec. 17b-749-16: Supplemental Payments: p. 63	DSS - regulation amendment	Reimbursement rates for academic year should reflect additional expense for full time care as needed.	Supplemental payments, as outlined by regs, seemingly just meet the appropriate need for summer vacations.
Applicants and recipients should be less than 50% of the state median income level for appropriate family size.	Sec. 17b-749-05 Financial Eligibility Requirements: p.20	DSS- regulation amendment, funding dependent.	Families should be eligible up to 85% of SMI.	Provisions exist in regulations for increase in income limit.

[1] Information in this column was supplied by DSS, D. Beltrame