Payment by Enrollment Changes effective 6/1/2021
Key Points and Important Changes

• Start date and attendance requirement
• 8 hour rule change
• Spot is reserved
• New provider change reporting requirements
• Parent reported changes
• Certification
Providers must report the actual start date of physical care.

A child must physically attend at least eight hours in the initial benefit month (the first month that you are paid subsidy for a new child or after a break in subsidy).

Once the 8-hour attendance requirement is met in the initial benefit month, subsidy may continue as long as the parent remains eligible and has a need for child care. Providers must report when a child is no longer enrolled and when a child who remains enrolled hasn’t attended in 90 days.
The 8 Hour Rule Has Changed

• Here is an example illustrating how the minimum 8-hour attendance requirement now only applies in the initial benefit month.

• A parent enrolls a child and a start date of June 15th is reported. The child attends 4 hours on June 15th and 5 hours on June 16th, but then goes on vacation for two months and returns to care on September 1st. Because the 8 hours were met in the initial benefit month of June, there is no overpayment for July and August.
Obligation To Hold The Spot

• DWS will allow pay by enrollment to reserve a spot for a full month, even if the child does not attend (for up to 90 days).

• Once you accept subsidy for a child for the month, you are committed to having space available for that child the entire month.

• If you want to fill the spot with another child for the following month, you must report the child as no longer enrolled.

• If a provider terminates care after issuance, DWS will only pay for actual hours of attendance in a benefit month.
If you do not have space for a child that you have been paid subsidy for, you have effectively terminated care and will have an overpayment.

Example: A provider has been paid by enrollment for July benefits. The child has not attended in 6 weeks, but the parent takes the child to care on July 20th, a regularly scheduled day according to the care agreement. The provider states that they do not have space. Since the provider is unable to care for the child, the provider is considered to have terminated care and will have an overpayment for July.
Changes must be reported within ten calendar days of learning of the change or by the 25th of the month, whichever is sooner. Please report all changes through the Provider Portal whenever possible.

To report changes on the portal, use the “Actions” button for the case, select the correct action, make changes, and click “Report Changes”.

New changes providers must report

• When an child has not attended for 90 days.
• When a child is no longer enrolled or will not be enrolled in the following month.
• If a child NEVER attends or attends less than 8 hours in the initial benefit month.
• When a provider reports these changes, the subsidy case will close at the end of the report month. However, the parent may contact their case worker to request that their case be reopened within the following month.
Examples of when and how to report:

• It is November 16th; Alice has not attended since August 18th. Report this situation immediately if possible but no later than November 25th. When reporting this change in the provider portal, report the 90th day of non-attendance.
  
  - In the DWS Provider Portal, report “Child has Stopped Attending”. Enter the last date the child attended as November 16\(^{th}\), the date this became a reportable change.
Examples of when and how to report:

- As of November 25th; Billy, who was supposed to start November 19th, has never attended. Report this immediately as it is already the 25th.
  
  - In the DWS Provider Portal, report “Child has NEVER Attended”.
• The parent reports to you on September 10 that they will no longer be bringing their children to you in October. You accept this statement as notice of disenrollment. You report in the provider portal on September 10th that the children are no longer enrolled as of September 30th. Always report the date the enrollment ended or will end.

• **Remember, if you report changes during certification but after the 25th of the month, it may be too late for DWS to take timely action on the case. It is best to report all changes as soon as you are aware of them.**
A parent enrolls a child and a start date of June 15th is reported to OCC. The child does not actually start until August 5th. Since the child did not attend a minimum of 8 hours in June, and not at all in July, subsidies paid for June, July and August are all overpayments.

The provider should have reported in the provider portal by June 25th that the child had NEVER attended. This would have prevented overpayments for the additional months.
A child is enrolled and a start date of June 15th is reported. The child attends for 4 hours on June 15th and does not return. The provider reports during certification on June 29th that the child attended less than 8 hours. It is too late to stop July’s payment. The provider will have an overpayment for June and July.

The provider should have reported by June 25th that the child had not attended 8 hours in the initial subsidy month. Had the provider reported the situation by the 25th and the child returned and attended 8 hours by the end of the month, the case could be reopened with no overpayment.
If a parent reports a change of provider to DWS before the next month’s payment is issued, DWS will stop the payment for the following month.

For example: A parent reports a change of providers to DWS on June 26th but has not told the previous provider that the children will no longer be enrolled. There is still time to stop the July payment to the previous provider. The new provider will be paid for July and the previous provider will not receive a payment based on enrollment.
Parent-reported changes in providers

- If a parent reports a change to DWS after payment for the following month is issued and the first provider reports that the child is still enrolled, changes will not be made for the current or following month.

- There is no overpayment if the provider continues to hold the spot.

- The parent is responsible to pay the new provider if the first provider has been paid based on enrollment.

- Usually, a new provider will NOT be paid for the same month.
A parent reports a change of provider on June 30th; July benefits have already been issued to the previous provider.

The previous provider is allowed to keep the July payment if the child was still enrolled with them for July, and the provider continues to hold the spot. The new provider will not receive a subsidy payment until August.
A parent reports a change of providers on July 6th. Due to the holiday weekend, the children have not attended the previous provider in July but are still enrolled and the provider is reserving space for them to attend.

July benefits have already been issued to the previous provider. The previous provider is allowed to keep the July payment. The change will become effective for August benefits.
A parent reports a change of providers on July 6th. July benefits have already been issued.

DWS learns that the children have not attended the previous provider since April 30th but they are still enrolled and the provider has been reserving space for them to attend. Since this is not a reportable change for the provider until the 90th day of non-attendance, the previous provider is allowed to keep the July payment. The change will become effective for August benefits.
Examples, continued

- A parent reports a change of providers on August 10th because the previous provider does not have space for the children. The children have not attended the previous provider in August. August benefits have already been issued.

- The provider is required to report a child as no longer enrolled if they want to fill the space with another child, and cannot be paid double for the same space. The provider will have an overpayment for August.
Examples, continued

- A parent reports a change of providers on December 3th. The children have not attended the previous provider in December, but are still enrolled. December benefits have already been issued.

- DWS learns that the children have not attended the previous provider since August 16th. The non attendance became a reportable change on the part of the provider on November 13th. The previous provider will have an overpayment for December only, The new provider can be paid for December.
Certification will still be required each month for licensed providers, and must be completed between the 25th of each month and the last calendar day of the month.

The certification process is the same, but some of the questions are different.
NEW points for certification:

- I have reviewed each case and reported any children who were never in care or attended for less than eight hours in the initial benefit month.
- I have reported any children who have not attended for 90 days.
- I have reported any children who are no longer enrolled or to my knowledge will no longer be enrolled next month.
Reminder: if you report changes during certification but after the 25th of the month, it may be too late for DWS to take timely action on the case.

Providers who have a pattern of not certifying may be subject to a review of their records by DWS.
Attendance Records

- Providers must still keep Time and Attendance records for each child. Records must be retained for a minimum of three years.

- You are encouraged to require the parent or authorized person to sign each child in and out daily.
Resources

- Provider Portal What’s New section and FAQs
- Child Care Provider Guide and addendum
- Recording of this Webinar
- Email OCC@utah.gov
- The FAQ’s and Provider Guide Addendum will be available online by June 1. Providers are required to agree to any changes to the provider guide within 30 days by logging into the DWS Provider Portal.