

Bulletin

January 17, 2014

Minnesota Department of Human Services -- P.O. Box 64941 -- St. Paul, MN 55164-0941

OF INTEREST TO

- County Directors
- Tribal Directors
- Child Care Assistance Supervisors
- Child Care Administrative Contacts

ACTION/DUE DATE

Please implement as specified in the bulletin.

EXPIRATION DATE

January 17, 2016

Reporting on Override Use in the Child Care Assistance Program

TOPIC

Instructions for reporting on override use in the Child Care Assistance Program.

PURPOSE

Provide instructions to county and tribal agencies on how to review and report override use in the Child Care Assistance Program

CONTACT

Counties and tribal agencies should contact your CCAP technical liaison or submit your question through PolicyQuest.

SIGNED

ERIN SULLIVAN SUTTON
Assistant Commissioner
Children and Family Services

Terminology Disclaimer

The terminology used to describe people we serve has changed over time. The Minnesota Department of Human Services (DHS) supports the use of "People First" language. Although outmoded and offensive terms might be found within this document, DHS does not endorse these terms.

I. Background

Office of Legislative Auditor (OLA) Finding

On July 11, 2013, the Office of Legislative Auditor (OLA) issued the Federal Compliance Audit Report identifying the results of their audit of certain federal financial assistance programs administered by the Department of Human Services (DHS) during state fiscal year 2012. The full report can be found on the OLA web page:

<http://www.auditor.leg.state.mn.us/fad/pdf/fad1315.pdf>.

The OLA audit identified that DHS did not monitor system overrides for Medical Assistance (MA), Temporary Assistance for Needy Families (TANF), and the Child Care Assistance Program (CCAP). Specifically, the report identified that DHS did not ensure counties reviewed reports to verify overrides were appropriate. The OLA report recommended that DHS continue to implement controls to monitor the specific eligibility overrides related to the MA, TANF, and CCAP programs.

Bulletin #13-69-05 provided information to counties and tribal agencies regarding the use and monitoring of overrides in the MA, TANF and CCAP programs. This bulletin, as a follow-up to bulletin #13-69-05, provides instructions for counties and tribal agencies on selecting, reviewing and reporting on cases with overrides for the Child Care Assistance Program.

Bulletin #13-69-05

http://www.dhs.state.mn.us/main/groups/publications/documents/pub/dhs16_177554.pdf

II. Program Policy and Requirements

A. General Requirements

Workers have the ability to override results within MEC² by using an “override” reason. When a county supervisor reviews MEC² report MG101, CCAP Eligibility and Service Authorization Override Report, they are able to identify unusually high numbers of overrides in caseloads which may indicate overrides are being used in error. DHS is also monitoring all county override usage through review of the MG101.

The MEC² system is programmed to incorporate Minnesota Statutes, Minnesota Rules, and policy information when determining eligibility results. However, there are situations when the system is not able to produce accurate results. These situations may include legislative changes that have not yet been programmed into the system or unique case situations that have not been programmed into the system. In these situations, workers may need to override eligibility results to obtain the correct eligibility result in the system.

III. Required Action**A. Override Use**

Counties will be required to review a certain number of cases with overrides each month and report their findings to DHS on a quarterly basis when the total number of cases with overrides as a percentage of the total number of cases served exceeds 25%.

B. County Notification and Case Selection

All counties will be notified of the range they fall within based on their override use. DHS will inform counties annually by September 30 of each year. For the first year of reporting, January – June of state fiscal year 2014, counties will be notified in late January 2014. Notification will be provided via email to the county director and the county child care assistance program administrative contact. Counties exceeding the 25% threshold for percentage of cases with overrides will randomly select the following number of cases on a monthly basis using the MG101 Report:

Override Use Percentage Category	Number of Cases to Select Monthly
Greater than or equal to 75%	3
Less than 75% and greater than or equal to 50%	2
Less than 50% and greater than or equal to 25%	1
Less than 25%	0

Counties should generate the MG101 report for each reporting month and randomly select the number of cases identified above. Focus should be given to cases with override reasons that do not clearly indicate why the override was used. For example, the override reason of “Provision for Age Flexibility” clearly indicates the reason why an override was needed. Other override reasons, such as “Other” and “System Override” do not clearly identify the reason why an override was used. Counties should select cases not reviewed in previous months unless there are no other cases to select based on the MG101.

C. Reporting

All counties required to report must select and report the number of cases identified in the table above for each reporting month within the state fiscal year. A separate reporting form must be completed for each case selected for each reporting month (see Attachment A). This form is available on eDocs (DHS-6804). All reporting must be submitted to DHS by the end of the second month following the end of the reporting quarter, according to the following schedule:

Reporting for January – June of SFY14	
<i>Reporting Quarter</i>	<i>Report Due Date</i>
January – March 2014	May 31, 2014
April – June 2014	August 31, 2014

Reporting for SFY15 and Beyond	
July – September	November 30
October – December	February 28/29
January – March	May 31
April – June	August 31

If a county that is required to report has zero cases with overrides during a reporting month, the county should complete DHS-6804 identifying the county name, reporting month and completion date at the top. The county should include a comment on the form identifying there were no cases with overrides for the reporting month. The boxes at the bottom identifying who completed the form and the CCAP Administrative Contact should also be completed. If a county that is required to report has less than the required number of cases to select on their override report for a particular month, they should report on the cases shown on the MG101 report, submitting a copy of the MG101 report along with DHS-6804 for each case identified.

Instructions on how to complete DHS-6804 are included on page 2 of Attachment A. In addition to completing DHS-6804, counties should determine whether an overpayment should be assessed on each case reviewed in which the override was done inappropriately.

DHS will inform counties of receipt of the form and will provide feedback to counties about the information they report.

IV. Legal References

Federal Child Care and Development Fund, 45 C.F.R. Parts 98 and 99

Minnesota Statutes, section 119B.02, subdivision 3

Americans with Disabilities Act (ADA) Advisory

This information is available in accessible formats for people with disabilities by calling (651) 431-3809 (voice) or toll free at (800) 627-3529 or by using your preferred relay service. For other information on disability rights and protections, contact the agency's ADA coordinator.



Minnesota Department of Human Services

Community Partnerships & Child Care Services
Child Care Assistance Program

Attachment A

Override Monitoring Form

COUNTY/AGENCY		DHS CONTACT PERSON	PHONE NUMBER	COMPLETION DATE
		Sheila Garceau	(651) 431-4051	
CASE FIRST NAME	CASE LAST NAME	MEC ² CASE NUMBER	REPORTING MONTH	

How many overrides were used on this case during the reporting month? Count one override for each version and each biweekly period as identified on the MG101 Report.

Service Authorization Overrides _____ Eligibility Overrides _____

Please explain the circumstances related to the use of the override(s) reason (attach more pages if needed):

Is there a supporting case note entered in MEC² explaining why the override was used? Yes No

Was the override appropriate? Yes No

If not appropriate, was the case corrected? Yes No

If the override was not appropriate, how was the case corrected OR if the case was not corrected, please explain?

COMMENTS (MORE INFORMATION MAY BE ATTACHED)

NAME AND TITLE OF PERSON COMPLETING THIS FORM	PHONE NUMBER	DATE (MM/DD/YY)

CCAP ADMINISTRATIVE CONTACT NAME	CCAP ADMINISTRATIVE CONTACT SIGNATURE	DATE (MM/DD/YY)

Please return this form to Sheila Garceau by U.S. mail at P.O. Box 64962, St. Paul, MN 55164-0962, by fax to 651-431-7483 or through secure email to sheila.garceau@state.mn.us

Instructions for completing the
Override Monitoring Form
Child Care Assistance Program

General Instructions:

Workers have the ability to override results within MEC² by using an “override” reason. When a county supervisor reviews MEC² report MG101, CCAP Eligibility and Service Authorization Override Report, they are able to identify unusually high numbers of overrides in caseloads which may indicate overrides are being used in error. When a county’s use of overrides becomes unusually high, the county will be required to select and review cases with overrides on a monthly basis, reporting information to DHS.

Counties required to report will need to complete one DHS Override Monitoring Form for each case selected and reviewed for each month of the reporting quarter. The county will submit all three monthly reports for a quarter at the same time. All reporting must be submitted to DHS by the end of the second month following the end of the reporting quarter.

If a county that is required to report has zero cases with overrides during a reporting month, the county should complete a DHS Override Monitoring Form identifying the county name, reporting month and completion date at the top. The county should include a comment on the form identifying there were no cases with overrides for the reporting month. The boxes at the bottom identifying who completed the form and the CCAP Administrative Contact should also be completed. If a county that is required to report has less than the required number of cases to select on their override report for a particular month, they should report on the cases shown on the MG101 report and include a comment on the form identifying that there were less than the required number of cases to select on the county’s MG101 report.

MG101 Report:

The MG101 Report should be generated for each reporting month. The detail report will identify all cases on which an override was completed during the month based on the approval date of the override. Counties should select the cases to report. Counties should select different cases each month unless there are no other cases to select based on the MG101. One override within a case can be applied to several biweekly periods, as identified on the MG101 Report. When completing the Override Monitoring Form, identify the number of overrides used in the case being reviewed as reported on the MG101 Report. The MG101 Report will identify an override for each version within each biweekly period. Count each of these separately for both categories of service authorization overrides and eligibility overrides.

The counties must provide an explanation of the circumstances related to the use of the override reason(s). This should not state the override reason used in MEC² but should provide information about the situation in the case that required the override.

Based on review of the case information, the county should identify whether the override was appropriate or not. If it is not appropriate, the case should be corrected.

Return all completed, signed and dated **Override Monitoring Forms** to *Sheila Garceau* by U.S. mail at P.O. Box 64962, St. Paul, MN 55164-0962, by fax to 651-431-7483 or through secure email to *sheila.garceau@state.mn.us*.