

# **SUBSIDIZED CHILD CARE ASSISTANCE TERRITORY MEETING**

## **10/27/2022**

1. Will the power point be available after the presentation to the counties?  
[The presentation was recorded and will be available. The PPT slides are attached.](#)
2. Do we need legal documentation when someone says they are the guardian or have custody or do we just accept client statement?  
[SCCA Policy does not require documentation of custody or guardianship. Policy does not capture guardianship documentation. However, if the worker suspects different, the worker can request documentation.](#)
3. Are we aligning with the FNS recently updated policy on base period to 30 days prior to app/recert or do we still go by the month prior?  
[We are aware of the change in base period policy for FNS. The base period policy for the SCCA Program has not changed. Please continue to use SCCA Program policy for base periods.](#)
4. If someone applied 10/29 or 10/31 and has received all pay for month, we would still use income from Sept?  
[Yes, the base period for an October Application would be September. However, to support family friendly practices, if the submitted paystubs are representative and the client does not readily have the September pay stubs available, it could be acceptable to take the October pay stubs along with thorough documentation on the case as to why the October pay stubs were used. Pending admin letter application, recert, and base period forthcoming.](#)
5. We have school employees that are receiving bonus pay but the bonus pay is different every month. How should we calculate?  
[The childcare worker should count or average the fluctuating income. Income that is counted from recurring earned cash bonuses and lump sum incomes are countable when determining eligibility for childcare assistance. In this situation, the childcare worker averages the income for the period of time it covers and records the resulting average monthly amount on the Application for Child Care in NC FAST. Additionally, the childcare worker can average out the bonuses what the client has available, i.e., if the client has 4 months, take the average of the 4. Refer \[4070.3 Calculation of Gross Income\]\(#\).](#)
6. Do you use FNS or the work # when both are available?  
[You should deem from FNS if this income is representative. If income is representative, then you should not need to request other verifications or pull work number. Work number is a great resource to use in obtaining income verifications if unable to any other way.](#)

7. Can you define "application month" and recert month"? i.e., date signed, date received, last month of CP etc. Use the date the initial application is signed to determine the base period, the month prior to the date the application is signed. The date of the end of the certification is used to determine the base period, the month prior to the end of the certification period.

For initial applications refer to Job Aid SCCA Application to Case, [Part V: Submit Application and Obtain Client Signatures](#), "A 30-day processing limit starts the day the application is signed."

For recertifications refer to [Job Aid-SCCA – Recertifications](#)

8. Do we need to search for the FNS verification of income in agency before using the income as DEEMED in active case when client reports no change in employer/income.

No, additional verification is not needed however, written documentation that verified information from the FNS/Work First tab on the income support page should be included on the case. SCCA Job Aid Application to Case states in section [Other Applications, Scenarios, and Resources](#) "An applicant who has been determined eligible for Food and Nutrition Services (FNS) is also deemed income eligible for SCCA. When completing an SCCA application, income from related FNS Cases can be obtained through the FNS & Work First folder on the Evidence Dashboard. Refer to the [SCCA – Using FNS Evidence as Verified SCCA Evidence](#) job aid for more details.

9. Do we count children earned/unearned income in the budget unit?

No **do not count earned income** refer to [SCCA Rule 10A NCAC 10 .1002 INCOME ELIGIBLE STATUS \(g\)\(20\)- \(g\)](#)  
*The following sources of income shall not be counted when computing the gross income of the income unit:*  
*(20) earnings of a dependent child under 18 years of age, unless the child is a minor parent of a child needing childcare.*

Yes, **do count Unearned income** refer to [SCCA Rule 10A NCAC 10 .1002 INCOME ELIGIBLE STATUS](#) for the inclusive list of items to be counted.

For example, [Rule 10.1002](#)

*(f) Income to be considered when computing the gross income of the income unit shall include:*

*(3) Social Security benefits including Social Security pensions, survivors' benefits, and permanent disability insurance payments.*

Also refer to [IEM 4030.2 Unearned Income](#).

10. Can other unearned income be deemed from FNS (besides Child Support) such as V.A. benefits?

No, unearned income cannot be deemed from FNS.

11. Direct Child Support (AP pays directly, not court ordered) - can we accept a written statement from AP stating "I Pay \_\_\_\_ \$100 every month" or does the AP need to specify each of the 3 months in the base period?

Yes, written statement can be accepted. Workers should attempt to make contact with the AP to verify the direct child support received in the base period prior to accepting the client's statement.

12. Doesn't 4050.1 Sources of Verification refer to the way we verify income? We don't typically require verification of custody or guardianship unless there is a reason to question the client's statement.

Correct, [IEM 4050.1](#).

13. Can we accept client's statement for direct child support that she receives or does the AP have to provide information on how much he pays her directly?

The worker should try to obtain a written statement from the absent parent before taking recipient's statement of child support. If the absent parent will not cooperate and provide written verification of direct child support or provide verification via a phone call, client's statement can be taken as a last resort. Client statement should be used as the last resort when all other avenues have been exhausted. [Refer to the IEM. 4050.1.](#)

14. Did I hear correctly that SE income cannot be deemed from FNS income detail?

Yes, SE should not be deemed from FNS at this time.

15. Is base period determined on recert date or date signed? We've always been told it's based on signature date.

The base period for the initial application is the month prior to the month the application was signed per the current policy manual. The base period for recertification applications is the month prior to the last month of the current certification period regardless of when the recertification packet is received in the agency. Example: Recertification ends 1/2023, the base period is December 22 if representative. [Refer to IEM 4070.2.](#)

16. Is there a time limit for deeming from FNS? Client is recertifying in October but the income showing under FNS is from January.

Policy is not specific on timeline when deeming from FNS. The IEM does note that representative income should be used. Additionally, Child support income should not be deemed from the Food and Nutrition's program as their conversion policies are based on frequency of payment and this is not SCCA policy.

17. Can we get something official sent about app dates, recert base periods since we seem to get such different guidance on this??

Pending admin letter.

18. Is the wet signature no longer required on applications or recertification? Can we accept them by fax, email, telephone?

We cannot accept signatures by phone unless the agency has the software to record it. We have advised county staff to obtain a wet signature and the signed documents can be accepted by fax or email. [Refer to Chapter 4.](#)

19. If we receive an app signed/dated 9/30 and we received it on 10/15. Do we have 30 days from the app date signed or date received to process the app?

County will have 30 days from the date the application was signed based on current policy. [Refer to Job aid SCCA – Application to Case.](#) New policy will be addressed in an admin letter.

20. If check stubs are attached in case and listed individually under employment, do we still have to list the gross amount of each check in documentation?

No, if the childcare worker did not upload their spreadsheets, budget sheet or calculator tape into NC FAST the worker does not have to list the gross amount of each check in documentation. If they have the calculator tape and document what the gross amount of each check is that's fine.

21. Do we have to contact the parent that is paying direct support for confirmation?

An attempt to receive a written statement should be made. Worker can supply a form 8113 for the absent parent or use a county form to verify. Only use the client statement if that absent parent is not willing to cooperate. [IEM 4050.3 and SCCA Policy Manual, chapter 7.](#)

22. Do we need to verify income of people NOT in the income unit, such as grandparent caretakers? especially unearned such as retirement income, VA benefits, etc.

No. The term “income unit” shall apply to persons who live in the same household and who, according to North Carolina law, are responsible for the financial support of the child whose eligibility for childcare services is being determined. [SCCA Policy Manual, chapter 7.](#) The need must be verified. We can accept a check stub or employer statement to verify the need.

23. We had been told that if the employer was current to use FNS, even if the FNS income was in a previous certification period. Is that still the criteria? Or does it have to be in the current certification period?

If the recipient is receiving FNS use the electronic verification system to verify income. The income shown within the electronic verification system can be used in either certification period. [IEM 4050.3.](#) Child care worker can deem from FNS by pulling the income support case, and from the evidence tab go to the FNS & Work First folder. They can pull the FNS earned income that covers the current time period for the SCCA recertification date. Due to COVID, if FNS did not recertify for a long period of time, it was allowed to deem income from FNS from a previous certification period. Child care worker should contact their TA for clarification.

24. Referring to the breakout example, we were told if they could not verify, they have a job to return to at recert while on maternity or medical leave, we could not recertify. Clarify.

At the time of redetermination, the family must meet all eligibility criteria in order to receive a new 12-month certification. If the family does not have a need for care due to a TEMPORARY change at recertification, the child care worker must document the family’s circumstances in the case record and family shall be granted another 12-month certification period. If a family does not have a need for care at the time of redetermination and it is due to a NON-TEMPORARY change, the family may not be granted another 12-month certification period. [Refer to Admin Letter #01-21. Part 3. Procedures.](#)

25. When the change came through that we could not decrease hours of care during the cert. period and that we no longer ask for grades, we were told that we did not have to get school schedules until recert. Is this correct?

That is correct. [Administrative letter #01-22 and administrative letter #06-18 and administrative letter #08-16.](#)

26. If a person is in active job search at time of recertification (which is a temporary change), can we still complete the recertification?

Yes. If the parent is between jobs at the time of the recertification, the worker should determine when the parent’s last employment ended. If the employment ended no more than 90 calendar days before the certification period end date, this is considered a temporary change and the certification should be completed, and the parent should be given another 12 months of eligibility if all other eligibility criteria are met. If the employment ended more than 90 calendar days before the certification period end date, the parent would not be eligible for another 12 months of services. Therefore, the case should close at the end of the current certification period. The parent can reapply for services when employed if child care assistance is still needed. If the county is on a waiting list, the parent should be placed on the county’s waiting list. [Administrative letter #-01-21 and administrative letter #01-22.](#)