

June 14, 2018

ALL COUNTY LETTER NO. 18-80

TO: ALL COUNTY BOARDS OF SUPERVISORS
ALL COUNTY WELFARE DIRECTORS
ALL COUNTY CHILD WELFARE DIRECTORS
ALL CHILD WELFARE SERVICES NEW SYSTEM
ALL JUDICIAL COUNCIL STAFF
ALL FOSTER FAMILY AGENCY DIRECTORS
ALL COUNTY CHIEF PROBATION OFFICERS
ALL TITLE IV-E AGREEMENT TRIBES
ALL COUNTY CHILD CARE COORDINATORS
ALL FOSTER CARE MANAGERS
ALL CHILD WELFARE SERVICE PROGRAM MANAGERS

SUBJECT: EMERGENCY CHILD CARE BRIDGE PROGRAM FOR FOSTER CHILDREN (BRIDGE PROGRAM)

REFERENCE: SENATE BILL (SB) [89](#), (CHAPTER 24, STATUTES OF 2017); WELFARE AND INSTITUTIONS CODE (WIC) SECTIONS [309](#); [361.45](#); [11461.6](#) AND [16519.5](#); HEALTH AND SAFETY CODE (H&SC) SECTIONS [1517](#); EDUCATION CODE (EDC) SECTIONS [8208](#); [8212](#); [8250\(d\)\(2\)](#); 45 CODE OF FEDERAL REGULATIONS (CFR) [1356.60](#); MANUAL OF POLICIES AND PROCEDURES (MPP) [47-260.3](#); CALIFORNIA CODE OF REGULATIONS (CCR), Title 5, Sections [18075.1 and 18075.2](#); ALL COUNTY LETTER NO. [17-109](#); COUNTY FISCAL LETTERS NO. [17/18-45](#); [17/18-45E](#) AND [16/17-75](#).

The purpose of this ACL is to provide answers to Frequently Asked Questions submitted by local Child Welfare Departments, Child Care Resource and Referral (R&R) Programs, and Alternative Payment Programs (APP) regarding the Bridge Program, as outlined in ACL 18-73, released on June 14, 2018. Questions and answers cover a range of topics.

For further information regarding the Bridge Program, please contact the Child Care Programs Bureau at childcarebridge@dss.ca.gov. For information regarding claiming, please contact the Fiscal Policy and Analysis Bureau at fiscal.systems@dss.ca.gov.

Sincerely,

Original Document Signed by:

TODD BLAND, Deputy Director
Family Engagement and
Empowerment Division

Original Document Signed by:

GREGORY E. ROSE, Deputy Director
Children and Family Services Division

c: County Welfare Directors Association
Chief Probation Officers of California
Judicial Council of California

Frequently Asked Questions for the Emergency Child Care Bridge Program for Foster Children (Bridge Program)

Q1. Does the Bridge Program become an entitlement program beginning in Fiscal Year 2018-2019, and if funding isn't available for future years would counties then pay for it with county funds?

A1. The Bridge Program is not an entitlement. Counties will have the opportunity to choose to opt in each fiscal year that funding is available. To the maximum extent possible, counties are encouraged to leverage federal IV-E funding, including administrative funding, available through Title IV-E of the federal Social Security Act, to enhance navigation and training support. Counties are encouraged to carefully consider the population in which it wishes to serve with the allocation provided in order to successfully administer the Bridge Program for the entire year in which the county opts. However, the county is under no obligation to continue to administer the Bridge Program once the State General Fund allocation is exhausted.

Q2. How can counties fund the overhead/administrative costs?

A2. The assistance allocation is strictly for the actual cost of child care for the client. Per CFL No. [17/18-45](#), "Assistance costs claimed to the CA 800 may not include any administrative costs associated with the provision of the child care subsidy payment/voucher." Similarly, the administrative allocation is strictly for the actual costs of the navigator and training components. Per CFL No. [17/18-45](#), "It is important to note that that unspent navigator and/or training funds may not be used to subsidize the emergency child care vouchers. All county administrative costs associated with the Bridge Program, such as case management, staff training, or administrative overhead must be claimed using existing CWS program codes and will not draw down funds from the State General Fund Bridge Program allocation."

Q3. Since funding for the Bridge Program in FY 2017-18 began on January 1, 2018, can identified eligible families be reimbursed for voucher payments as of January 1, 2018?

A3. Yes, the start of the initial 6-month voucher period will begin on the date that the child care services begin but no earlier than January 1, 2018.

Q4. Can a county's eligibility criteria be limited to include licensed child care providers only?

A4. No, WIC section [11461.6](#) governing the Bridge Program does not contain statutory language requiring providers to be licensed. EDC section [8212](#) requires, as part of the resource and referral program, that each County

program make referrals to both licensed child day care and license-exempt facilities when there is no licensing requirement.

Q5. What is the plan for the foster children when their voucher time period ends?

A5. The Bridge Program is intended to act as a link to help resource families successfully transition the foster child into high-quality subsidized child care. Thus, one of the navigator's primary roles is to secure long-term care for the child before the voucher/payment period lapses. In the event that the family is unable to secure long-term child care, the child care navigator should work with the family and the child's social worker to determine what supports and services may need to be secured to maintain the placement.

Q6. Who makes the determination that a family can continue to be eligible beyond 6 months to 12 months?

A6. A voucher may be provided for up to six months or until the child is successfully enrolled into long-term, subsidized child care. Counties also have the discretion to extend eligibility an additional six-months, not to exceed 12 months, if the family is unable to secure long-term, subsidized child care during the initial six-month period.

Q7. Do counties have the discretion to limit the duration of the Bridge Program's child care voucher or payment to under six months?

A7. Pursuant to WIC section [11461.6\(f\)](#) counties do not have discretion to limit the duration of the Bridge Program's child care voucher or payment to under six months. Every qualifying child receiving the voucher payment is eligible to continue receiving the voucher within those six months as long as they qualify or until funds are no longer available. A Bridge Program voucher can be less than six months if a long-term child care arrangement is made or the dependency is dismissed and the child exits from foster care.

Q8. Are birth parents, who have recently reunified with their child and need emergency child care, eligible for Bridge Program funding?

A8. No, biological parents in Family Maintenance or Family Reunification may be eligible for other child care subsidies and should be referred to the local R&R/APP Programs. Eligible families for the Bridge Program include:

- Resource families and families that have children placed with them in an emergency or for a compelling reason;
- Licensed foster family homes or certified family homes;
- Approved homes of relatives or nonrelative extended family members;

- Parents under the jurisdiction of the juvenile court, including but not limited to non-minor dependent parents.

Q9. Are there any circumstances where counties can claim higher than their Regional Market Rate (RMR)?

A9. Statute provides that vouchers shall be in an amount commensurate with the RMR. WIC [11461.6\(c\)\(2\) & \(c\)\(3\)](#). In limited circumstances, counties may reimburse child care providers at a rate higher than the RMR ceiling. See CCR, Title 5, Sections [18075.1 and 18075.2](#).

Q10. Can a county use its local program flexibility to choose to pay less than the RMR ceiling (for example, can a county choose to offer a flat amount of per child for child care assuming lowest ceiling is higher than the flat amount?)

A10. Counties should reimburse actual child care costs charged by the child care provider up to the RMR ceilings. Statute provides that vouchers shall be in an amount commensurate with the RMR (WIC [11461.6\(c\)\(2\) & \(c\)\(3\)](#)).

Q11. What is considered beyond the scope of ordinary parental duties?

A11. Beyond the scope of ordinary parental duties includes, but is not limited to:

- Attendance at administrative or judicial review;
- Case conferences;
- Team meetings; or
- Foster parent training.

Q12. If the family is reunified during the time the child is receiving a Bridge Program voucher, can the voucher payments continue for the remainder of the six-month period, or should services be terminated immediately, upon reunification?

A12. If a family is reunified during the time the child is receiving a Bridge Program voucher, a transition plan to alternate subsidized care should be developed. Biological families, with the exceptions of parents under the jurisdiction of the juvenile court, including but not limited to non-minor dependent parents are not eligible for the Bridge Program funding but may be eligible for other subsidized child care options.

Q13. Can Bridge funding be used on non-approved Resource Family Approval (RFA) homes?

A13. Yes, families that have a child placed with them in an emergency or for a compelling reason, are eligible to receive a time-limited monthly payment or

voucher for child care and a child care navigator subject to county eligibility requirements. See ACL [17-109](#).

Q14. What is TrustLine? And what is the process for approval?

A14. TrustLine is California's registry of in-home child care providers who have been through a criminal background screening and clearing process. A background check discloses information about any criminal history that a potential child care provider may have. TrustLine is administered by the California Department of Social Services (CDSS) Community Care Licensing Division (CCLD) Caregiver Background Check Bureau and the California Child Care Resource and Referral Network. For more information on the process for applicants who want to become a TrustLine-registered child care provider refer to the [CDSS Trustline web page](#).

Q15. License-exempt caregivers will be required to register with TrustLine in order to be paid through the Bridge Program. Can Stage 1 funding be used to pay for the TrustLine background check?

A15. No, CalWORKs Stage 1 child care funds are specifically earmarked for Stage 1 and cannot be used for Bridge Program participants.

Q16. Are family members exempt from the TrustLine requirement in the Bridge Program?

A16. If a license-exempt child care provider is the aunt, uncle, grandmother, or grandfather of the child, related through blood, marriage, or court decree then the provider is exempt from Trust Line registration per H&SC [1596.66\(a\)](#). However, these individuals may need to be deemed appropriate by the social worker and/or dependency court judge and additional requirements may be necessary for Resource Family Approval or from CCLD.

Q17. Are potential/applicant child care providers entitled to an appeal process if they are denied as a child care provider due to criminal or CPS history?

A17. If the potential/applicant child care provider is not listed on the TrustLine Registry because of a disqualifying conviction or a substantiated child abuse report, the CDSS offers an appeal process to allow the individual to demonstrate their good character. If the [appeal](#) is decided in their favor, they will be placed on the TrustLine Registry.

Q18. Under what circumstances would someone wanting to be a child care provider not qualify due to criminal or Child Protective Services (CPS) record?

A18. If a person fails to reveal any conviction on their TrustLine application, the application may be denied or registration may be delayed (list of [disqualifying crimes](#)).

Q19. Can a county obtain a waiver to use an entity other than the local Resource & Referral (R&R) Program to administer the Trauma Informed Care (TIC) training or the child care navigator?

A19. No, the R&R Programs are specified in statute for the navigation and TIC training role. The only exception as stipulated in ACL [17-109](#), "If the R&R Program does not enter into a formal agreement with the county child welfare agency, the R&R Program must explain, in writing, why entering into a formal agreement is not practical or feasible." The county can then utilize another entity.

Q20. In placing a child out of county, which county is responsible for the voucher payment, the child care navigator, and training supports?

A20. The Bridge Program provides participating counties flexibility to define local priorities, see WIC [11461.6\(d\)](#). To that end, counties may work collaboratively to provide the voucher to children across jurisdictions or may have policies that require the child to be placed within the county of jurisdiction to receive the voucher. Counties may have agreements to exchange funding when serving each other's populations.

Q21. In support of providers, can R&R Program staff receive trauma training using Bridge Program training funds?

A21. Yes.

Q22. Can travel costs associated with TIC trainings be allocated to navigator and/or trauma training?

A22. Travel costs to trainings must be included in the budget portion of the contract between the county and the R&R Program as a required and necessary component of the training in order for travel costs to be reimbursed using Bridge Program funds.

Q23. Are licensed-exempt providers required to take TIC training as a condition of receiving a voucher payment?

A23. No, however, TIC training should be made available and all child care providers should be encouraged to participate in the training for the well-being of the child(ren) in their care.

Q24. What is the difference between the Bridge Program and the Foster Parent Child Care Program?

A24.

| Bridge Program | Foster Parent Child Care Program |
|--|---|
| <ul style="list-style-type: none">• Statute requires that vouchers must be in an amount commensurate with the RMR.• Provides for a child care voucher, child care navigator, and TIC training.• Funded by state general fund. Federal Title IV-E and County funding is allowable.• Is not an entitlement. | <ul style="list-style-type: none">• Statute does not provide guidelines for payment amounts.• Only provides for a child care payment.• Funded by federal and county funds. Use of state general funds is not allowable. <p>Source: ACL 05-23 and 05-23E</p> |