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EDMUND G. BROWN JR.  
GOVERNOR

August 24, 2018

ERRATA

ALL COUNTY LETTER NO. 18-80E

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: ERRATA TO THE 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. [18-80](#); [17-109](#); COUNTY FISCAL LETTERS NO. [17/18-45](#); [17/18-45E](#) AND [16/17-75](#).

This errata provides clarification to ACL 18-80 which addressed Frequently Asked Questions (FAQ) submitted by local Child Welfare Departments, Child Care Resource and Referral (R&R) Programs, and Alternative Payment Programs (APP) regarding the

Bridge Program. Answers have been amended to clarify a range of topics. Significant changes have been made to questions two, four and sixteen in the FAQ document.

For further information regarding the Bridge Program, please contact the Child Care Programs Bureau at [childcarebridge@dss.ca.gov](mailto:childcarebridge@dss.ca.gov). For information regarding claiming, please contact the Fiscal Policy and Analysis Bureau at [fiscal.systems@dss.ca.gov](mailto: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? 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 in which funding is available. To the maximum extent possible, counties are encouraged to leverage federal Title IV-E funding, including administrative funding, to enhance funding, consistent with federal eligibility rules. Counties are encouraged to carefully consider the population in which it intends to serve with the allocation provided in order to successfully administer the Bridge Program for the entire year in which the county opts to participate. 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. For counties contracting out voucher services to local Alternative Payment Programs (APP), administrative costs associated with voucher issuance may be claimed through the assistance allocation. Commencing July 1, 2018, participating counties may claim eligible Bridge Program assistance costs (voucher costs) on the appropriate County Assistance 800 (CA 800) claim forms. Administrative costs of the APP will be funded with 100 percent General Fund (GF) Bridge funding as long as it is part of the APP contract. Costs claimed to the APP on the CA 800 claims will be funded through the County's voucher allocation. These APP administrative costs are the only allowable administrative cost that may be associated with the payment/voucher. More information regarding claiming instructions will be released in a forthcoming County Fiscal Letter.
- 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. 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, when there is no licensing requirement, license-exempt facilities.

Note, however, that federal policy requires child care services for children in foster care to be rendered by a provider that is licensed, certified, or has some other formal status under State or local regulations in order for the State to claim reimbursement under title IV-E. Therefore, when Title IV-E funding is used to implement that county's Bridge Program, the license-exempt child care provider must, at a minimum, be registered with Trustline. See Q&A 14-18 for additional information on Trustline and background checks.

- 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 child care supports and services are needed on an ongoing basis.

- 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, whichever is sooner. Participating 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 for up to 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. Parents who have been reunified with their children 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 WIC [11461.6\(c\)\(2\) & \(c\)\(3\)](#) provides that vouchers shall be in an amount commensurate with the RMR. 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 WIC [11461.6\(c\)\(2\) & \(c\)\(3\)](#) provides that vouchers shall be in an amount commensurate with the RMR.

**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, including Child and Family Team meetings in which the child does not participate; 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. Families who have reunified, with the exceptions of parents under the jurisdiction of the juvenile court, including but not limited to nonminor 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 cleared through a fingerprint check of records at the California Department of Justice. A background check discloses information about any criminal and child abuse history that a potential child care provider may have. Inclusion on the Trustline registry means that the potential care provider has no disqualifying criminal convictions or substantiated child abuse reports in California. 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, federal policy requires child care services for children

in foster care to be rendered by a provider that is licensed, certified, or has some other formal status under State or local regulations in order for the State to claim reimbursement under title IV-E. Therefore, if the county is leveraging Title IV-E funding to support its Bridge Program funding, any license-exempt child care provider must undergo a background check through the Trustline.

**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.

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