



## Management Bulletin 20-18: Reopening and Reimbursement Requirements for Direct Service Contractors

[Management Bulletin MB 20-18](#) implements the provisions in Senate Bill 820.

### Program Reimbursement Policies

- These policies apply to all Direct Contract providers, including Family Child Care Home Education Network Providers (FCCHEN).
- In order to be eligible for reimbursement, programs must meet one of the following criteria:
  - Be physically open for early learning or childcare purposes:
    - Physically open programs must provide distance learning to those families who are ordered to or choose to shelter-in-place or isolate due to the COVID-19 pandemic.
  - Be physically closed by a State or local public health order and offering distance learning services:
    - Programs that are closed due to public health order must complete and submit the [Notification of Closure Due to Public Health Order](#) template within thirty (30) days of the closure.
  - Operate programs on an LEA campus and the LEA campus is closed by a State or local public health order. The LEA authority must discuss the closure in a public hearing and prepare a plan to safely re-open as soon as possible.
    - The contractor must complete and submit the "[Verification of Closures](#)" template to their assigned CDE, ELCD Regional Consultant.
- Programs that choose to remain closed without a State or local public health order, or by decision of the LEA campus on which they are located, are not eligible for reimbursement.
  - Programs that remain closed without a public health order must submit a revised FY 2020-21 program calendar and program narrative change to their assigned ELCD Regional Consultant to ensure that the correct minimum days of operation (MDO) are reflected in their contract.
- Contractors that are closed due an emergency not related to the COVID-19 pandemic, such as earthquakes, fire, flood or other circumstances beyond their control, must submit an Emergency Closure request to their ELCD Regional Consultant, in accordance with the forthcoming Non-COVID-19 Emergency Closures MB. Until the forthcoming Non-COVID-19 Emergency Closures MB is released, direct service contractors shall submit requests for emergency closure approval in accordance with [MB 10-09](#).

### Prioritization for Services

- When capacity is limited due to the public health order, the following priorities for in-person enrollment apply:
  - Children who are recipients of Child Welfare Services
  - Children at risk of abuse and neglect
  - Children in families where both parents work outside the home, with lowest income receiving the highest priority.
    - When two families have the same income ranking, the child with exceptional needs must receive in-person services.
    - If there is no child with exceptional needs, the family that has been receiving services for the longest length of time shall be prioritized for in-person services.
    - For CSPP contractors, priority must be given to four-year old children before three-year-old children.
  - Children in families who are not working outside the home.
    - When two families have the same income ranking, the child with exceptional needs must receive in-person services.
    - If there is no child with exceptional needs, the family that has been receiving services for the longest length of time shall be prioritized for in-person services.
    - For CSPP contractors, priority must be given to four-year old children before three-year-old children.

### **Part-Day CSPP**

Part-day CSPP contractors are encouraged to develop models that provide in-person services to as many children as possible, including possible hybrid models. If a part-day CSPP provider is unable to provide in-person services to all enrolled families, the following priorities apply:

1. Children who are the recipients of Child Protective Services
2. Children at risk of abuse and neglect
3. Four-year-old children who are not enrolled in Transitional Kindergarten, with the lowest income ranking in relation to family size
4. Three-year-old children with the lowest income ranking in relation to family size

### **Reimbursement Requirements for School-Aged Children**

- Direct service contractors and FCCHEN providers shall be reimbursed for care during the time a school-age child is participating in TK–12 distance learning and attending the childcare program during the typical school hours.

### **Data Reporting Requirements: Attendance and Expenditure Reporting**

- For FY 2020-21, CCTR, CSPP, CHAN, and CMIG contractors will be reimbursed without regard to enrollment or attendance. If the days of closure are not attributable to closure by a local or state public health order or other non-COVID-19 emergency closure, the contractor's reimbursement will be pro-rated by the days of operation the contractor was not open to provide services.

- The CFCC contract reimbursement calculations and reporting requirements remain unchanged.
- Direct service contractors, whether providing in-person or distance learning services, are required to report the days of enrollment for all children receiving services in the program, as well as attendance for all children physically attending the program.

#### **Reporting Days of Operation and Days of Enrollment for FY 2020-21**

- For purposes of reporting between July 1 and September 7, 2020, direct service contractors will report the days of operation previously approved by the CDE and indicated in the program calendar, regardless of whether the program was open to provide in-person care to children. Direct service contractors will also report the days of enrollment associated with the days of operation during this period, regardless of whether the program was open to provide in-person services to children.
- Beginning September 8, 2020, programs will report the days of operation and days of enrollment only if the program is physically open, closed due to public health order or operated by an LEA and closed due to LEA closure.

#### **Reporting Days of Attendance and Excused Absences for FY 2020-21**

- Direct service contractors will only report the days of attendance for children who receive in-person services and will not report days of attendance for any children participating in distance learning activities.

For more information, consult [Management Bulletin 20-18](#).