

## Feedback – Enrollment-Based and Prospective Pay

**Question 1. Families will need to plan and report provider changes in advance (mid-month). How will this impact providers and families? DCYF will only be able to pay one provider per child for the same time. This means when DCYF pays a provider in advance, the family will have to pay their new provider unless the family reports their new provider in the prior month. How will this impact providers and families?**

Feedback/Question/Comment	DCYF Response
<b>Context</b>	
Is this question connected to receiving payment for a month, and providers receive two months? Does this have to do with reporting? More context on these questions is needed.	This question is specific to the federal requirement that only one payment is allowed per child for the same time frame. Families will need to report changes well in advance of the actual changes so the new provider will be paid for with Child Care Subsidy.
<b>Communications</b>	
The state must send a letter to families in the language of the family. Direct communication between the state and families to describe what we are going to pay the provider.	DCYF currently provides family letters in their primary language. This will continue.
<b>Training</b>	
How far in advance will you train Call Center employees?	Our Subsidy Call Center staff will be trained about 3 months to the first month of enrollment and prospective based payment.
<b>Family Barriers</b>	
With use of limited suspension of a child, what barriers may exist for the family?	DCYF will need to develop policies regarding temporary suspension or expulsion. Based on Federal requirements, another provider may not be paid for the same time as the original provider.
<b>Families: Impact on children during transition between providers</b>	
There are concerns about children transitioning between care settings mid-month, especially in cases where behavioral issues arise and they are sent home early.	DCYF will need to develop policies regarding temporary suspension or expulsion. Based on federal requirements, another provider may not be paid for the same time as the original provider.  DCYF acknowledges the impact to the family when the child is suspended or when child care is terminated. There is potential impact to the family when changes are not reported timely as well.
The transition between providers will likely be messy, and in some cases, children might be left without care until the new month begins.	
There's a concern that children might end up in unlicensed care temporarily, as families may struggle to find new licensed providers mid-month. This raises safety and continuity of care issues.	
Unintended consequences could include parents missing work or even losing their jobs due to these challenges, particularly if they cannot find care during the transition period.	
<b>Families: Financial Impact</b>	
Without proper notice, families may face financial strain by having to pay out of pocket for new providers, leading to confusion and potential payment delays for the new provider.	DCYF acknowledges the change and potential impact for families.

Feedback/Question/Comment	DCFY Response
<b>Families: Planning</b>	
This requires pre-planning for families, which is great. Will there be some flexibility for last-minute changes?	The Federal requirement is that only one provider is paid per child for the same time frame. If DCYF allows changes after the first provider has been paid, then the original provider would be considered an overpayment and the provider would have to return the payment.
Depending on the type of family, this won't be practical. Some families are not used to child care being planned that far ahead, will pose a challenge.	
Parents should plan for the change for children. Parents should give advance notice of child care changes.	
<b>Families: Reporting - General</b>	
What are the requirements for the family receiving subsidy? Are there requirements put on them around communicating with providers?	Currently the family must report within 5 days, any change in provider. Under these future rules, families must report a change prior to the 15th the month prior to the change. For example, if the provider is changing June 1, then the family will need to report prior to May 15th.
In the past families have not been held accountable for any kind of notice.	This change will create an environment where reporting changes will be necessary.
<b>Families: Reporting- Causes for potential delays</b>	
Inconsistent communication with family, some families leave the country for work such as migrant and seasonal families, they may not have a consistent schedule	Family eligibility and the amount of care authorized for the family is not changing under these new rules.
This is a tricky question: a lot of the times the parents make a change, like moving, changing times, and sometimes it's not known in advance. There are a lot of unknowns with families and the decisions they make.	DCYF acknowledges the complexity of this question. Changes in providers will impact both families and providers under these new rules.
<b>Families: Reporting Timeframe</b>	
A month is a good time frame for providers but on the family side, a month might be too long, two weeks seems more reasonable because of jobs changing or moving	DCYF will pay the following month of child care around the 21st of the previous month. This means that families will need to report by the 15th of the month to have their provider changed with subsidy paying the new provider.
One month's notice is our recommendation (with ruling for emergency situations, listing specific scenarios) but need clarification for tribes and military programs for civilian providers.	These rules will not change private pay requirements. Tribal and Military providers will continue with their own private pay policies.
This may be difficult for families as often WCCC families do not give proper notice. This requirement would be helpful for providers.	DCYF acknowledges that this will support providers and increased family burden to report changes timely.
Might need to consider increasing their notice requirement from 2 weeks to 1 month internally to support this	Providers may develop their own policies to support.
This will likely cause confusion and challenges for both providers and families, especially if families don't provide timely notice of the change. A grace period may be necessary to ease the transition.	Thank you for your feedback regarding the potential impact to families.
Families may struggle with notifying DCYF in advance, which could result in gaps in payment or coverage. This will be particularly challenging for those using subsidy.	

Feedback/Question/Comment	DCFY Response
<b>Families: Transition Period</b>	
Transition time should be extended to give them time to work with families to make this adjustment.	We acknowledge that this is a concern and will look into it.
If DCYF implements the one-provider rule, it's important to allow families flexibility during the transition. Families should have the choice to pay providers during this period to avoid gaps in care.	Families will have the option to pay out of pocket to the provider, to avoid gaps in care.
<b>Families: Vulnerable Communities</b>	
What do we do for families that are living in crisis and may potentially miss out on care due to this change	We acknowledge that this is an issue. We are looking at ways to mitigate the impact this change will have on these families. We may adopt ways to work with these families in the way that we currently are.
Children with medical needs or disabilities, as well as unexpected medical crisis, how might this impact them?	Providers will still be eligible for absent days under these new rules. A child's medical condition or disability will not change the reporting requirements for families.
There are additional complexities for families who use licensed vs. unlicensed providers, especially for children with special needs. How will these transitions be handled?	
I strongly believe that families must be allowed to have some circumstances where they leave without proper notice and are still allowed to start care elsewhere due to extenuating situations such as DV, becoming homeless (or acquiring stable housing) or other life situations that do not allow for proper notice. Currently, families can leave with no notice and the provider just receives a 10-day notice.	The Federal requirement is that only one provider is paid per child for the same time frame. If DCYF allows changes after the first provider has been paid, then the original provider would be considered an overpayment and the provider would have to return the payment.  DCYF may develop specific situations in which the state may duplicate payments with state only funds. This will need legislative approval and funding.
<b>Families &amp; Provider: Interpersonal</b>	
Interpersonal issues may arise between providers and families if a parent wishes to switch care but is restricted by the new rule. This could strain relationships and affect the provider's business.	DCYF acknowledges these new requirements will change requirements between families and providers regarding changes.
<b>Providers: Slots</b>	
Could impact providers with higher turnover.	Enrollment and prospective payment are intended to support providers participating in subsidy with consistent payment.
Our center requires a 60-day notice because it takes time to bring another family in.	These new requirements will not change private pay family requirements.
Two weeks can leave providers with an open space if they're not able to fill it in a timely manner	DCYF currently pays for 10 days when a family terminates care early. When families report timely providers should have similar timelines under these new requirements.

Feedback/Question/Comment	DCFY Response
<b>Providers: Payment</b>	
How will providers be paid if a family does not provide a two-week notice? Will there be a process for providers to sign off that they did receive adequate notice prior to a family moving their care?	DCYF currently pays for 10 days when a family terminates care early. When families report timely providers should have similar timelines under these new requirements. Families who do not report timely may be required to use the previous provider or pay their new provider privately.
Question 3 suggests providers will be paid for two months if a child is not in attendance. Why just two weeks notice when a provider could potentially lose the next month's tuition if they cannot fill the slot?	DCYF is paying subsidy on behalf of an eligible child. We must work within the federal and state requirements for payments. There are differences between when a child disenrolls from a provider and does not change providers (question 3) and when a child changes providers and needs to continue care with a new provider.
When a child enters, when exactly does the payment begin?	The payment begin date depends on the date the child is eligible and the date the provider is eligible for payment.
Providers can't control this. No matter the actions of families, providers shouldn't have to bear the consequences.	DCYF is seeking feedback on how to minimize consequences for both families and providers.
Does prospective payment have to happen by or on the first of the month?	This is the expectation when possible. It is possible that a payment will be made after this date. This includes times when a child's eligibility is after the first of the month, or the initial payment is processed after the first of the month. Ongoing payments are expected to be paid prior to or at the beginning of the month.
<b>Providers: Payment - Copay</b>	
Co-pays can get lost in the shuffle of transferring mid-month	There will be limited mid-month transfers under these future policies. Mid-month transitions will have the copayment requirement go to the provider authorized on the first day of the month.
<b>Providers: Payment - Overpayment</b>	
The challenge is some people will have to refund working connections dollars	<p>The Federal requirement is that only one provider is paid per child for the same time frame. If DCYF allows changes after the first provider has been paid, then the original provider would be considered an overpayment and the provider would have to return the payment.</p> <p>DCYF may develop specific situations in which the state may duplicate payments with state only funds. This will need legislative approval and funding.</p>
In an emergency or relocation situation maybe they could have that as an exception and have that written into the law so there is not duplicate payments	DCYF would like to implement policies that increase payment accuracy. Enrollment and prospective payments practices will reduce overpayments to providers as long as providers maintain all other requirements including electronic attendance requirements.
<b>Providers: Provider's Policy &amp; Communication</b>	
Families should follow the withdrawal policy of the site. It should not be a blanket withdrawal policy. Providers can share their policy with DCYF in MERIT or child care check.	DCYF must follow federal and state requirements when paying child care on behalf of a family. This includes following state rules regarding payment on behalf of eligible children for withdrawals prior to the end of their authorization.
Providers will have to spell this out in the family manuals, providing written instructions so they know upfront what the expectations are.	DCYF agrees that provider policies will support this work.

Feedback/Question/Comment	DCYF Response
<b>Providers: Reporting Timeframe</b>	
If it stays at mid-month, have DCYF continue to pay for the following month. That would keep the provider whole while giving families flexibility.	The specific issue with the federal requirement is that for any month that is paid to the old provider, a new provider must be paid for by the family directly. This reduces family access for families that cannot afford the new provider.
Providers should not be penalized for families making changes mid-month.	DCYF acknowledges that provider changes are one of the most significant challenges with implementing these policies. DCYF currently provides 10 days payment for early termination, this would continue when a future change is made mid-month.
How will the pre-qualification period affect this change? Will it help the provider or not if the parents do not send the required documents?	DCYF will continue to provide presumptive eligibility for families in some circumstances. These family eligibility periods will reflect their eligibility. DCYF will pay the family's eligible months prospectively.
How does this change affect the provider when children are in care for longer than negotiated? And when they have special needs that are not documented?	Prospective payment may help providers track family eligibility and payment better than retrospective payment practices. Special need payments will be made prospectively and based on enrollment when children are eligible for special needs payments.
<b>Providers: Staffing</b>	
Beneficial for providers since it provides notice for staffing changes etc.	DCYF expects these policies to support providers in a variety of areas including staffing.
<b>Providers: The New Provider</b>	
No one will want to be the 'new provider'?! Or there will be a gap in care for the child/family?	DCYF acknowledges the impacts of provider changes for both providers and families.
New providers may be disproportionately impacted, as they may not receive payment until the family reports the transition, leaving families responsible for the costs in the meantime.	DCYF expects that these practices will improve transparency for providers who are authorized and paid for services.
<b>Providers: Tracking</b>	
It will likely require additional tracking and reporting time. It could also require updated/upgraded tracking systems.	DCYF does not anticipate increased provider tracking. Participation in an approved electronic attendance system, and daily attendance sign-in/sign-out will still be required.
For families that receive subsidy—who keeps track of the subsidy payment, is it providers or DCYF? If they don't communicate and leave, how is this tracked?	Providers will be required to report when children do not attend at least one day in the month (question 3).
<b>Providers: Training</b>	
Will you see a provider training before the changes happen?	DCYF will provide updated billing guides and detailed communication prior to implementation. Training will be available for Licensed Family Homes as provided under the Collective Bargaining Agreement.

## Feedback – Enrollment-Based and Prospective Pay

**Question 2. DCYF will have to verify the child’s enrollment, provider’s capacity, hours of operation, age groups and other requirements before payment is made under enrollment and prospective based payment. What are the best ways to go about verifying enrollment? How should DCYF verify other eligibility requirements like capacity, hours of operation, and age groups?**

Feedback/Question/Comment	DCYF Response
<b>Comment: Capacity</b>	
Capacity verification is more complex, as some children share spots.	DCYF will need to verify capacity and enrollment. Shared slots will be available when a child is eligible for part-time. Full-time authorizations will not be able to share slots unless the hours allow for full-time authorization.
Difficult behaviors/complex needs children: We are artificially keeping our capacity down because it’s very hard to manage those complex behaviors in the classroom.	Provider capacity and enrollment is still a provider's choice. DCYF will need to verify that enrollment is at or under capacity to make payment.
Providers should be responsible for verifying their own capacity and determining whether they can take on more children.	Under the current policies providers must claim correctly. In the future, providers will not claim payment at all and will be paid based on authorization. This will defer responsibility for accurate and eligible payment to DCYF. Verification of capacity, hours of operation, and enrollment will be part of the process to authorize and make payment.
More clarity is needed on how to verify capacity, especially for providers serving school-age children, who often operate over capacity knowing some children won’t attend regularly.	DCYF will continue to explore options around this and include this in future communication and roll-out.
Many centers expect absences, so they factor this into their capacity planning.	DCYF will not be able to pay for the same slot twice. Verifying part-time enrollment and attendance will still be required after initial verification. This will be done by provider audit as it is currently.
<b>Comment: Enrollment</b>	
Enrollment is often staggered, adding to the complexity.	DCYF acknowledges the complexity of enrollment and managing capacity.
<b>Comment: Time it takes to verify</b>	
The key challenge is that it may take longer to verify enrollment and capacity due to the diversity and complexity of child care environments.	DCYF acknowledges the complexity of enrollment and managing capacity.
<b>Comment about the question</b>	
What is the actual ask of question two?	Under the current policies providers must claim correctly. In the future, providers will not claim payment at all and will be paid based on authorization. This will defer responsibility for accurate and eligible payment to DCYF. Verification of capacity, hours of operation, and enrollment will be part of the process to authorize and make payment. This question addresses providers preference to verify necessary elements specifically slot availability and a child's enrollment. DCYF will not be able to pay a provider for hours outside of license, age groups outside of license, when the provider is over capacity, or when a child is not enrolled.
What is meant by "verify"? Providers already work with licensors who can verify these details.	
What do hours of operation and age groups have to do with the eligibility requirements?	
Are they talking about providers updating that in MERIT?	DCYF acknowledges that capacity, hours of operation, and age groups are in Merit and may be able to use that system to verify this information. DCYF does not have enrollment information and will need to verify this with the provider prior to authorization.

Feedback/Question/Comment	DCFY Response
<b>Communication</b>	
Who will notify parents of changes to the extra time that will be given to children?	DCYF notifies parents of the eligibility in writing and in the family's primary language.
<b>Concern: Access to update information in systems</b>	
Providers can't update their own enrollment in WA Compass and Child Care Check (unsure, should check on this).	DCYF does not track a provider's enrollment.
<b>Concern: Staffing</b>	
Staffing is very hard right now.	DCYF acknowledges provider staffing challenges and the results to capacity.
Staff changes – there is a disconnect between slot/capacity vs. child care capacity slots	
<b>Concern: Workload</b>	
Less work from providers—we're overworked and stressed out.	DCYF expects that administrative burden resulting from participating in subsidy will be less. Providers will not need to claim invoices for payment, and payment will be made at the beginning of the month. DCYF will need to verify a child's enrollment with a provider prior to authorization and payment.
We need less burdens and more support.	
We need to acknowledge the real-world context.	
<b>General Comment</b>	
A standardized process for verification is needed.	Provider feedback recommended using MERIT information for available information. This leaves a child's enrollment and a provider's current enrollment or capacity as items to verify prior to authorization and payment.
Theme around do no harm to providers. The system needs to be set up like this, in keeping track around eligibility requirements.	
Confirming enrollment ahead of time/prospective invoice.	
Prospective payment pays 95% of funds with a brief reconciliation period to account for changes or late notices.	The federal requirements do not allow for retrospective payment.
Giving parents enough flexibility while also ensuring the provider has proper notice and pay.	Thank you for your feedback.
<b>Impact on providers from late/not reporting</b>	
Not penalizing providers for late/no notice on families leaving	DCYF currently pays 10 days when authorizations are closed early.
<b>Verification: Review how other providers verify</b>	
What do family sites do since they are already paid on an enrollment basis? Why additional steps for centers?	Subsidy payments are made after services are provided based on provider payment claims. This is the same for both centers and home providers. In the future payment will be made prior to the month of service based on care authorized.
<b>Verification: Annual reconciliation</b>	
Annual reconciliation instead of monthly.	DCYF will process payments monthly.
Annual renewal notice that includes all of this information.	DCYF will need to verify enrollment and capacity with each authorization to ensure accurate payments for each child.
<b>Verification: Attendance records</b>	
Providers: if we have children in ECEAP, that's in ELMS. For child care, attendance records are submitted.	Payment will no longer be based on attendance.
The children's attendance.	
Providers must submit attendance using the DCYF verified program - why is anything else necessary?	DCYF will make payments prior to the month of service. DCYF will need to ensure that the child and provider are eligible for payment prior to the payment. Attendance records only shows attendance and show this after the month of service.
Verifying enrollment would be in the attendance records	



Feedback/Question/Comment	DCYF Response
<b>Verification: Child Care Aware concerns</b>	
<p>Child Care Aware: we don't have accurate data because we're overwhelmed, example. If a provider leaves, the slots are lowered, which may not be an accurate representation.</p>	<p>This is one of the reasons DCYF will need to verify enrollment and capacity when setting up authorization.</p>
<p>There are a lot of issues with data, it's not 100% correct and is skewed because the reporting isn't accurate. For instance, slots may show as available, and providers do not have the capacity to accept them.</p>	
<b>Verification: Continue with current system</b>	
<p>Current system of submitting attendance works well.</p>	<p>DCYF plans on supporting the current electronic attendance system processes for attendance tracking.</p>
<p>For verifying enrollment, would it just be expanding the current system?</p>	<p>Not all providers use the DCYF attendance system. Additionally using the electronic attendance system for private pay families is not required. Enrollment of private pay families will factor into the DCYF ability to authorize and pay for care.</p>
<p>DCYF has this information already, just need to figure out the best way to provide it.</p>	<p>DCYF can use current information to determine licensed capacity, ages, and hours. Current vacancy and the child's enrollment will need to be verified with the provider to ensure accurate payment.</p>
<p>Isn't all this in the system already (WCCC can see it somehow already &amp; they check in annually already)?</p>	
<p>DCYF would verify center eligibility requirements the same way that they do now.</p>	
<p>Centers/providers would be required to make a claim similar to how claims are made now. Providers would be making the claim based on their expectation of what children will be attending. It is necessary to have providers make a claim on the SSPS system (or call in if people still do that) because it is very common to have children that have left (specifically moved out of state or no longer need care) to remain on invoices for months and providers need to claim zero. This would allow providers to claim only children that are expected to attend.</p>	<p>The payment process under enrollment and prospective payment will be completely different. Children who do not participate in care for the month will need to be reported and authorizations closed.</p> <p>Additionally, providers will not be claiming care. Care will be made based on the child and provider eligibility prior to the month of service.</p>
<p>Don't understand this question. This information is in child care check so why is it necessary to "verify enrollment"?</p>	<p>DCYF can use current information to determine licensed capacity, ages, and hours. Current vacancy and the child's enrollment will need to be verified with the provider to ensure accurate payment.</p>
<b>Verification: Licensing</b>	
<p>Licensing dictates capacity, hours, age groups, etc.</p>	<p>DCYF can use current information to determine licensed capacity, ages, and hours. Current vacancy and the child's enrollment will need to be verified with the provider to ensure accurate payment.</p>
<p>A lot of reporting is done to the licensors.</p>	
<p>Licensors should capture this and it is in Child Care Check.</p>	
<p>Look at the license. Providers are required to fill out paperwork annually to renew, why add additional steps?</p>	



Feedback/Question/Comment	DCYF Response
<b>Verification: Monthly form/attestation</b>	
When they're authorizing care, each month providers would need to sign an attestation that they will be providing care to certain children	DCYF will confirm provider eligibility and then provide an authorization for care. Providers will need to report when a child disenrolls or when the provider is no longer eligible for payment.
providers and families connected to the military in Washington State must complete a monthly benefit form after care has been provided in order for the provider to receive the Department of Defense subsidy. Providers are saying this is overly burdensome and we shouldn't move towards this.	This is similar to the current DCYF subsidy process today. The DCYF subsidy payment process will change under these new rules. These new rules do not apply to other subsidies such as tribal, military, county, or city based subsidies.
Perhaps design and implementation of a monthly enrollment certification process that includes a signature from the local administrator on an enrollment list generated from the database. DCYF might be able to sample certifications when conducting onsite monitoring visits.	Payment will be made prior to the month of service. DCYF will need to verify information prior to payment.
At the beginning of each month, DCYF could send an email listing enrolled children, and providers could verify if those children are still enrolled.	DCYF will confirm provider eligibility and then provide an authorization for care. Providers will need to report when a child disenrolls or when the provider is no longer eligible for payment.
<b>Verification: Provider Portal</b>	
The provider portal could be used for verification purposes.	DCYF will explore automating these processes.

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**Question 3. DCYF will need to close an authorization and no longer pay child care when a child stops attending or is disenrolled. Providers will need to report this to DCYF. Is one month of no attendance the right timeframe? (Providers will receive two months’ payment). How should DCYF verify other eligibility requirements like capacity, hours of operation, age groups, etc.?**

Feedback/Question/Comment	DCFY Response
<b>Comment: Capacity</b>	
If enrollments exceed capacity, would that present a challenge? Accepting payment for slots above capacity wouldn't be permitted.	This is a primary concern. Currently providers claim payment based on their eligibility and attendance. DCYF will not be able to pay for more slots than a provider has available. Also, not all slots are paid under Working Connections Child Care requiring DCYF to verify capacity at enrollment.
Some children may not come every day, so enrollment may exceed capacity.	DCYF will not be able to pay for more slots than a provider has capacity.
<b>Policies</b>	
Although this is about dropping Working Connections Child Care (WCCC) financial support, not the slot at the center, which could have different policies.	DCYF will not be able to pay for more slots than a provider has capacity.
<b>Reporting Responsibility</b>	
Shouldn't parents be responsible for informing DCYF that their child is disenrolled or not attending anymore? Why is this on the provider?	DCYF appreciates this feedback and will prioritize fairness and equity in implementing the new federal requirements, so providers are not monetarily penalized for payment issues that are out of their control.
<b>Slot Model</b>	
Or until the slot has been filled.	DCYF is not able to use state or federal funds to pay for a service when it is not provided. Disenrollment may be caused by either the provider or the family. The provider has the primary responsibility to report this as they receive the payment.
Slot model would work best.	
Do no harm to providers: we have no choice or say when a parent leaves. Is there a way to receive payment until the slot is filled?	
<b>Timeframe of no attendance – 1 month</b>	
Others recommend sticking to one month.	Thank you for your feedback.
Fiscal note of two month vs one month - might be a tough sell, would need to justify that. 60 days may be too long.	
Yes, as long as parents acknowledge and sign the provider's policy. Given a written handbook with the information	
I think 30 days works for private or non profit childcare.	
Assuming this question is asking if a student is absent with no communication for a month can the provider open the spot? If so, yes. Suggest making this question clearer for the Provider Supports meeting.	
One month is enough time.	
One month (or less) seems fine to me (I currently have a 2 week notice requirement for families) and a waitlist a mile long - so, filling a spot is NOT difficult.	
<b>Timeframe of no attendance – More than 1 month</b>	
We might want to streamline with ECEAP which is 45 days, or just have exceptions that staff can approve, it would be nice if family care providers were aligned as well	DCYF is tied to the payment system in use and combing with monthly units will make it very difficult to limit to 45 days. Families who return will be eligible for re-enrollment and payment upon timely report.
Recommend two months to account for families who leave and return.	
Using a two-month no attendance provision would help ensure providers can hold a slot open for unusual or extenuating family circumstances without compromising cash flow.	

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**Question 4. DCYF could transition to monthly rates which would create consistent monthly payments. Do you have a preference on whether we transition to a monthly rate instead of a daily rate?**

Feedback/Question/Comment	DCYF Response
<b>Daily Rate</b>	
Daily rate.	Thank you for the feedback.
<b>Monthly Rate</b>	
Yes, monthly.	Thank you for the feedback.
Monthly is preferred.	
Monthly: Yes.	
Billing monthly would be beneficial.	
Monthly: This is fair to providers, because this is how families pay.	
A monthly rate sounds good.	
Monthly rate makes sense as it is difficult for providers to fill a spot on a daily basis. It is an unnecessary budgetary nightmare to plan for daily rates for subsidy students.	
A monthly rate may be more stabilizing for local childcare systems.	
Monthly rate makes sense. However, it is my understanding that our state does not allow prospective payments. Therefore, legislation will be required unless the payment is processed after the first of each month, then a monthly unit would be necessary to change to and no legislation would be required as payment would be requested and made in the same month that care is provided.	
It should be a flat monthly rate.	
It should be monthly (3 votes for this).	
Flat month works.	
Yes we are all supportive to that.	
Monthly fine. That's how we bill private pay families.	
<b>Additional Comment</b>	
Family homes already get a monthly rate - this question is meant for centers? It pretty much alienates the in-home providers by the way you asked that.	DCYF did not mean to alienate in-home providers based on this question. Licensed family home providers are paid in monthly units and the question was geared to centers who will make the transition to enrollment and prospective based payment. Payment practices for Family, Friend, and Neighbor providers are not changing.

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**Question 5. What other guidance do you have for DCYF? What other questions or feedback do you have?**

Feedback/Question/Comment	DCYF Response
<b>Comments about the questions asked</b>	
These are correct questions.	Thank you.
There is no acknowledgment on the actual conditions of reality currently.	This discussion was to get feedback on implementing future policies as required under Federal policies specifically.
Context right now is critical and should be acknowledged.	
The framework should be 'do no harm' to providers. We are inundated with challenges from multiple areas (besides DCYF), like insurance companies, etc.	DCYF acknowledges the complex environment that providers operate under. The feedback received highlights potential impacts to providers and families specifically for future federal requirements.
It's very hard to answer these questions because I am missing context.	DCYF appreciates this feedback and will incorporate it into future work with providers seeking their input on policy. We learned from this experience that full context and practical examples
No, some questions are not clear and need more detail.	
Please be aware of your audience. Not every child care provider comes from a center. Many are in-home providers.	Enrollment and prospective based payment are specific to licensed providers. FFN provider payment practices are not expected to change.
<b>Exceptions</b>	
Questions around exceptions—what is the guidance around this? Frame questions around the exceptions for providers. This can be tied to qualifications, etc.	DCYF does not expect any exceptions for licensed providers as these are federal requirements.
<b>Federal Requirements</b>	
More context around the federal requirements is needed to know what the right questions are.	DCYF appreciates this feedback and will incorporate it into future work with providers seeking their input on policy. We learned from this experience that full context and practical examples illustrating our policy question better assist providers to give meaningful feedback.
What are the federal requirements that will help us guide the questions for providers?	
Tie the questions to the federal requirement, context is critical.	
Additional context around the federal requirements are needed to help come up with questions/feedback.	
<b>Impact on other provider types</b>	
I realize that this form was created for ELAC, so bringing the questions to Provider Supports should occur, but WCCA and the union for home providers should also be asked for feedback as they reach a greater number of providers.	This process was specific to ELAC and Provider Supports. DCYF will continue to gather feedback and this includes discussion with SEIU 925.
How would this work for ECEAP and subsidy providers (half day)?	Providers will be paid similarly as today with payments being made based on enrollment and at the beginning of the month.

Feedback/Question/Comment	DCFY Response
<b>Other variables impacting providers</b>	
Other questions - what about vacation, TK, staffing challenges, professional development days, holidays etc. How will those days and situations be addressed in this new model?	DCFY acknowledges that additional work around closure days will need to be developed and clear for providers.
There are various components that need addressing like challenges we face with TK, qualification requirements, and low payment.	This discussion was to get feedback on implementing future policies as required under Federal policies specifically.
We need to acknowledge the real-world context: there are significant challenges providers are facing, and we need to be able to tell the story and be able to understand the complexities that child care providers are facing in order to accurately provide feedback on the policy related questions that are being asked/or are needed.	DCFY acknowledges the complex environment that providers operate under. The feedback received highlights potential impacts to providers and families specifically for future federal requirements.
TK is impacting programs, will DCFY/Subsidy be paying for the slots due to the impact that TK is creating? We don't need WCC if providers can't stay open due to TK slots taking those slots away. A couple of comments from various regions had similar comments/feelings.	DCFY must base child care subsidy payments on child eligibility and planned attendance. This discussion is specific to the future implementation of prospective and enrollment-based payment.
<b>Reporting Responsibly</b>	
Providers should not be held liable or responsible for what a family or care giver does. Having to pay money back to the state due to the family not fulfilling their responsibilities should not be on providers if we have fulfilled our responsibilities.	Feedback regarding these policies is important to identify the areas family and provider responsibility.
<b>Special Needs</b>	
These are the right questions. Might you include an open-ended question related to serving children with special needs and whether or not there may be potential impact or concerns related to their care?	Special needs payments will follow these same payment policies in the future. There was feedback provided specifically to children with special needs and potential impacts of untimely change reporting.
<b>Summer Care Only</b>	
How will this impact Summers, some teachers have children in care during Summer and discontinuing during the school year?	This was one of the examples provided. Many families change providers in summer. Under these new requirements families will need to report changes the month prior to the change to be eligible for subsidy payment.