



Attendance Verification:

How to Avoid Paying Back Money!

Maryland Child Care Provider Leadership
April 6, 2022

Presented By | The Maryland State
Department of Education

Overview and Agenda



Child Care Scholarship Program Attendance Verification

- ✓ **WHY** the attendance Verification?
- ✓ **WHO** can be Verified?
- ✓ **WHEN** did the Verification process start?
- ✓ **WHAT** is the Verification process?
- ✓ **HOW** are the invoices selected?
- ✓ **HOW** often are providers selected?
- ✓ **WHAT** are the next steps?
- ✓ **NEED TIPS?**
- ✓ **QUESTIONS**

Attendance Verification



WHY the Attendance Verification?

Program Integrity – Federal Requirement

98.68 Program Integrity

The final rule requires Lead Agencies to have effective procedures and practices that, ensure integrity and accountability in the CCDF program.

Maryland's State Plan Response to Federal Program Integrity Requirement

MSDE has a contract with a single vendor. The vendor is required to complete a quality assurance review of 25% of cases completed per month. The Child Care Scholarship branch conducts a random secondary review of these cases throughout the year. MSDE also monitors cases to determine accuracy of authorizations based upon child care scholarship policies and the absence of Improper Authorization of Payments (IAP) that result in overpayments or underpayments. In addition, the Child Care Scholarship Branch conducts random annual reviews of cases to ensure all entities are authorizing services based upon established policies and procedures. During the annual review, error rates approaching 5% indicate the need for additional technical assistance to keep Maryland below a statewide error rate of 10%.

Attendance Verification



WHY the attendance Verification?

September 6, 2019 Office of Legislative Verifications (OLA) Finding

“DEC lacked procedures and controls to ensure that invoices for childcare subsidies were properly supported and payments were made only to eligible recipients. DEC also lacked assurances that valid attendance records supported subsidy payments to providers.”

Compliance Solution

Child Care Scholarship Case Management and Payment Processing Functions Solicitation #: R00R1600082 CATS+ TORFP RFP for Maryland State Department of Education

TO Contractor shall communicate (via phone, text, mail, or email) with providers regarding changes or challenges associated with processing invoices. Verifying Reported Attendance

1. TO Contractor shall perform an attendance verification by selecting a random sample of twenty-five (25) percent of provider invoices once every two weeks. This Verification verifies children’s attendance.
2. TO Contractor shall verify attendance reported with the parent’s signature on the provider’s sign-in and out sheet.

Attendance Verification



WHO can be Verified?

All formal child care providers who are paid with Child Care Development Funds for children using a child care scholarship may be selected to provide Attendance Verification for any service period.

WHEN did the Attendance Verification process start?

Attendance Verification began in 2015. In 2021, the requirement increased from **1% to 25% of paid invoices** within a Service Period due to a 2019 Office of Legislative Verification finding.

Requests for attendance sheets can be requested 5 years from the date in which services were paid by the Child Care Scholarship Program, if an Invoice is selected for a federal or State Verification processes or to resolve Program Integrity issues.

Attendance Verification

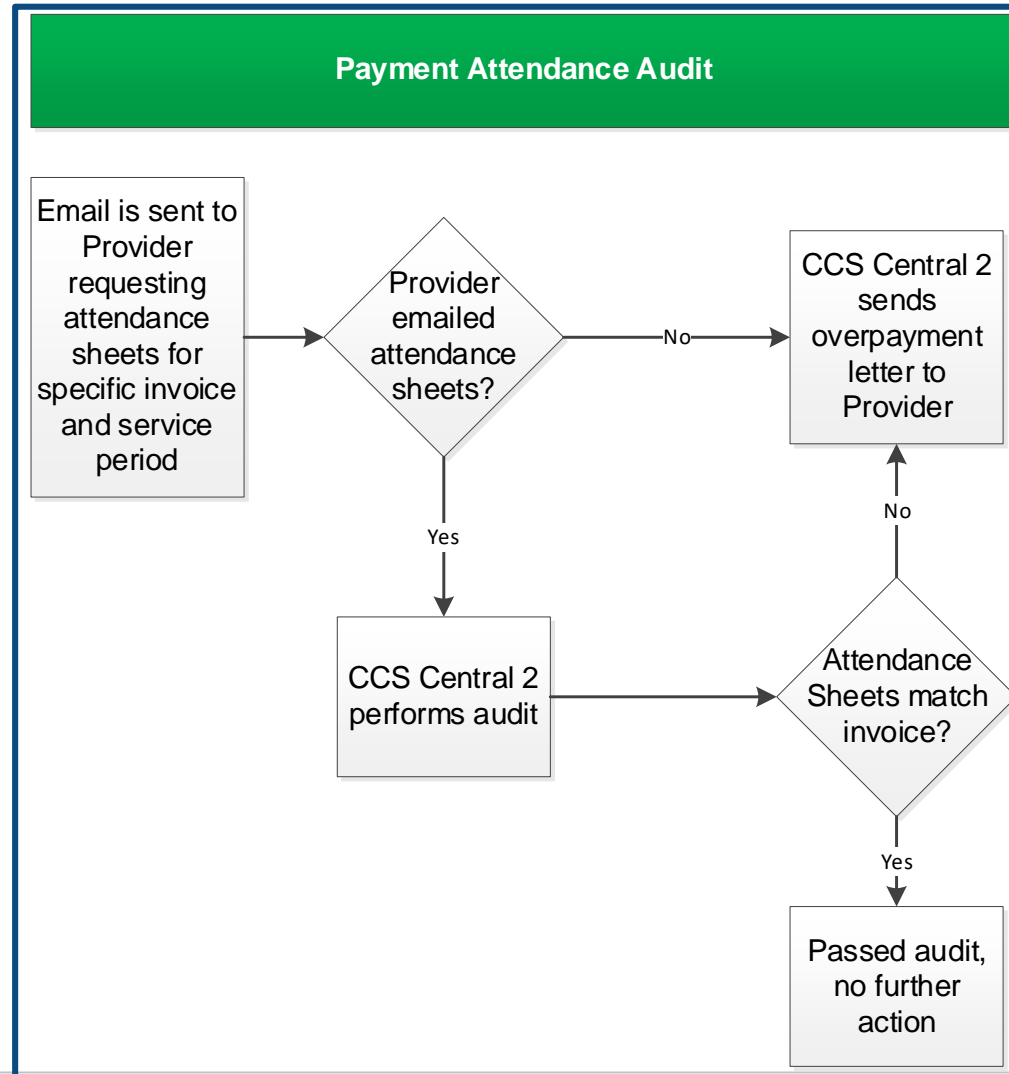


WHAT is the Verification process?

- Once the child care provider has been selected to provide Attendance Verification, they will receive an email from CCS Central 2 requesting the attendance sheets for a specific invoice and the applicable service period.
- The provider must submit a copy of the **signed** sign-in and sign-out sheets or proof of the electronic attendance signature receipt used by the child care facility to track parent signatures within **14 days** of receiving the email request:
 - Only submit the signed sheets for the child(ren) on the invoice, sending all the children slows down the process and is not required.
 - The attendance sheets must include the provider name and provider ID.
 - Email the attendance sheets to ccsaudits.msde@maryland.gov
- If attendance sheets are not received within 14 days, an **overpayment letter** will be mailed to the provider for the entire amount of the invoice.
- You must notify your Licensing Specialist, if you need to update your email address in CCATS.

Attendance Verification

WHAT is the Verification process – process flow diagram?



Attendance Verification



WHAT is emailed?

Email verbiage that lets providers know that they have been selected for an Attendance Verification

Dear Child Care Provider,

02/21/2022

You were selected for an Attendance Verification for service period **01/17/2022 - 01/30/2022** for the children on the enclosed invoice. Please send a copy of your attendance sheets for the applicable service period and children within 14 calendar days from the date of this letter 02/21/2022. The attendance sheets **MUST** be signed by the parents.

Submit the signed attendance sheets to: CCSAudits@Maryland.gov. To expedite the process, when sending the email insert the following in the Subject line: Attendance Sheet, Service Period, Invoice ID, Provider ID

Example of how to enter the subject line:

Subject line: Attendance Sheet, June 21, 2021 – July 4, 2021, 9990001, 79423

CCS Central will be sending 2 forms of communication for the audit (you are only required to respond once)

1. This letter which was sent via the postal service
2. Every provider who has an email on record will receive an email.

Effective in September 2021, CCS Central 2 will only use email as the primary source of communication.

If CCS Central 2 does not receive the documents within 14 calendar days, an overpayment will be created for the entire payment amount of this invoice.

Sincerely,
CCSCentral2
1-877-227-0125

Attendance Verification



HOW are the invoices selected? -

Child Care Scholarship Central 2 uses RAND scalar function programming to randomly select 25% of all paid invoices per services period.

Providers who submit more than one invoice a service period have a higher probability to be selected more often.

Child Care Scholarship Central 2 will email the request for an Attendance Verification to the same email in which the Invoice required for provider payment is emailed. (Use same monitoring process of this email address for both documents)

Attendance Verification



HOW often are providers selected?

How Many Times Was A Provider Audited?	
How Many Times	How Many Providers
1 Time	611
2 Times	453
3 Times	299
4 Times	154
5 Times	85
6 Times	58
7 Times	28
8 Times	14
9 Times	11
10 Times	1
11 Times	2
12 Times	1
13 Times	1
14 Times	0
15 Times	2

The table above illustrates how many times a provider has been selected for the first 10 Verifications.

611 providers have been selected one time; 453 providers have been selected twice, etc.

Important Note:

The random attendance Verification consists of a selection of 25% of all PAID invoices for each service period. If a provider sends in 1 invoice for the service period they have a 1 in 4 (25%) chance of being selected for an Verification. If the provider submits 6 invoices, their probability increases dramatically to be selected. Also, if a child care provider submits multiple invoices for one service period and adjustments are also submitted within that same service period, their probability of being selected each service period increases further. The following data provides how/why providers may be Verified multiple times.

Examples:

Extremely Large Licensed Providers

Example one provider had 10 invoices and 7 adjusted invoices for 1 service period

Large/Normal size Licensed Providers

Typically send 3-4 invoices and 1-2 adjusted invoices for 1 service period

Smaller Licensed Providers and Family Child Care Homes

Typically send 1 invoice and possibly 1 adjusted invoice

Attendance Verification



WHAT are the next steps?

Previous Verifications:

If providers received an email for an Verification and **did not submit** the required attendance sheets, or there was missing information and the Verification could not be conducted the following will occur beginning on **April 8, 2022**.

1. CCS Central 2 will send 1 unique communication to these providers and will provide one opportunity for the providers to submit their attendance sheets by the deadline in order to remove the potential overpayment(s).
2. Providers will have 60 days to respond to this request. If the attendance sheets and/or requested information is not received by the deadline, an overpayment letter will be sent to initiate the collection process.

Ongoing Verifications:

1. CCS Central 2 will continue sending the emails for Attendance Verifications.
2. Child Care Providers will continue to email sign-in and sign-out sheets, **within 14 days**, to CCS Central 2 when they have been selected to provide Attendance Verification.

Attendance Verification



WHAT are the next steps – consolidated letter ?

SAMPLE – CONSOLIDATED ATTENDANCE VERIFICATION LETTER

<Date>

RE: Action Required – Attendance Verification - Final Notice – Provider ID XXXXXXXX

Dear Provider:

We have requested attendance records for the service periods outlined in the chart below:

Invoice ID	Service Period

As of today, we have either not received the correct signed attendance sheets as previously requested or if you have submitted them, there was a discrepancy. **Immediate action is required.** Please send a copy of your signed attendance sheets for the invoices and service periods noted above no later than **5pm on 06/12/2022** to comply with this request. The attendance sheets **MUST** be signed by the parents.

Email the signed attendance sheets to: **CCSAudits@Maryland.gov**. To expedite the process, when sending the email insert the following in the Subject line: Resubmittal of Attendance Sheets, Provider ID. If you have any questions regarding this notice, please contact CCS Central 2.

Sincerely,

CCS Central 2, 1-877-227-0125

Attendance Verification



NEED TIPS? -

1. **Only send attendance sheets for the child(ren) and service period listed on the invoice in the Attendance Verification email.**
2. **Maintain a simple sign-in and sign-out process that is easy for the parents to sign and easy for the provider to scan and upload.**
3. **Attendance templates** can be downloaded at www.money4childcare.com
4. **Maintain a process where signatures are obtained daily** and where someone within the child care program is confirming signatures.
5. **Maintain a process that ensures the Invoice matches the days in which the Attendance Sheets documents the presence or absence of a child**, as indicated by the parent's signature.
6. **Maintain a system where the email box is checked** and Attendance Verification can be submitted before the submission deadline. (Should be a process similar to submitting the Invoice under similar circumstances)

Attendance Verification



SAMPLE Attendance Sheets

Template can be found at money4childcare.com

All Attendance Sheets Must Include:

- ✓ Provider Name
- ✓ Provider ID
- ✓ Date
- ✓ Child's Full Name
- ✓ Parent's Physical Signature

If not, the results are:

1. Unable to identify the provider who submitted the Attendance Sheet
2. Initiation of the Overpayment Collection process

Maryland State Department of Education
Child Care Attendance Sheet

FACILITY or PROVIDER NAME _____

MAILING ADDRESS (NUMBER, STREET NAME) _____

CITY, STATE, ZIP CODE _____

PROVIDER ID _____

INSTRUCTIONS:
Child attendance must be recorded on a daily basis. Attendance must be indicated by time in and out in the upper diagonal box. For each day that a child is in attendance a parent/guardian must initial in the lower diagonal box under the day.

NOTE: For Child Care Scholarship, this attendance sheet is **ONLY** required when an invoice has been selected for audit. **Please do not submit unless requested.**

CHILD'S NAME (PLEASE PRINT) (First Name, Last Name)	Week of / / to / /							Week of / / to / /						
	Sun	Mon	Tues	Wed	Thurs	Fri	Sat	Sun	Mon	Tues	Wed	Thurs	Fri	Sat

OCC – Child Care Attendance Sheet (3/10)

Attendance Verification

SAMPLE Attendance Sheets

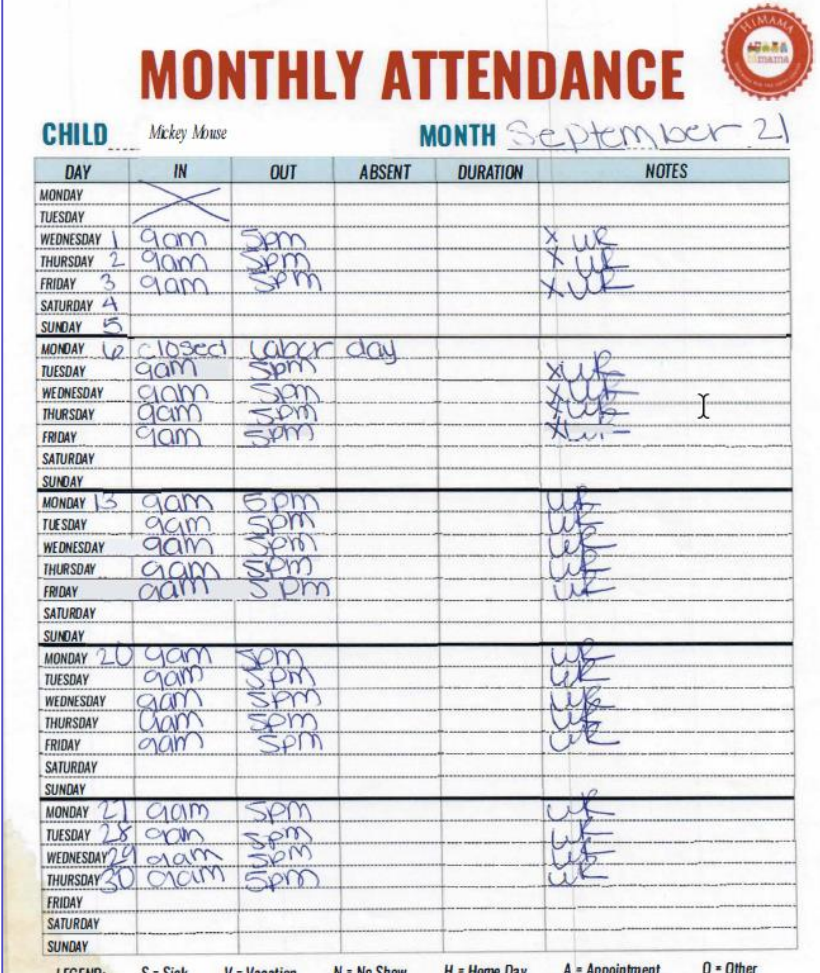
The Attendance Sheet is missing:

- ✓ Provider Name
- ✓ Provider ID

Results:

1. Unable to identify the provider who submitted the Attendance Sheet
2. Initiation of the Overpayment Collection process

Child's name has been updated to protect their identity.



MONTHLY ATTENDANCE

CHILD: Mickey Mouse MONTH: September 21

DAY	IN	OUT	ABSENT	DURATION	NOTES
MONDAY					
TUESDAY					
WEDNESDAY	1 9am	5pm			X UR
THURSDAY	2 9am	5pm			X UR
FRIDAY	3 9am	5pm			X UR
SATURDAY	4				
SUNDAY	5				
MONDAY	6 closed	labor day			
TUESDAY	9am	5pm			X UR
WEDNESDAY	9am	5pm			X UR
THURSDAY	9am	5pm			X UR I
FRIDAY	9am	5pm			X UR
SATURDAY					
SUNDAY					
MONDAY	13 9am	5pm			UR
TUESDAY	9am	5pm			UR
WEDNESDAY	9am	5pm			UR
THURSDAY	9am	5pm			UR
FRIDAY	9am	5pm			UR
SATURDAY					
SUNDAY					
MONDAY	20 9am	5pm			UR
TUESDAY	9am	5pm			UR
WEDNESDAY	9am	5pm			UR
THURSDAY	9am	5pm			UR
FRIDAY	9am	5pm			UR
SATURDAY					
SUNDAY					
MONDAY	27 9am	5pm			UR
TUESDAY	28 9am	5pm			UR
WEDNESDAY	29 9am	5pm			UR
THURSDAY	30 9am	5pm			UR
FRIDAY					
SATURDAY					
SUNDAY					

LEGEND: S = Sick V = Vacation N = No Show H = Home Day A = Appointment O = Other

Attendance Verification

SAMPLE Attendance Sheets

Attendance Sheet is Missing:

- ✓ Provider ID
- ✓ Provider Name
- ✓ Physical Signature
- ✓ The child's name is provided. However, there are 6 X Johnsons in CCATS, all with the same spelling. There is no way to confidently link to a specific provider

RESULTS:

1. Unable to identify provider
2. Unable to process
3. Initiation of Overpayment process

201-Monthly Attendance Report																																11-01-2021 thru 11-30-2021			
Name	01	02	03	04	05	06	07	08	09	10	11	12	13	14	15	16	17	18	19	20	21	22	23	24	25	26	27	28	29	30	Attend Per Child	Class Days Per Child	Monthly Average Attendance		
X Johnson	1	1	1	1					1	1	1	1	1			1	1	1	1	1				1	1	0					1	1	18	19	94.74%
Daily Attendance Totals	1	1	1	1					1	1	1	1	1			1	1	1	1	1				1	1	0					1	1	18	19	94.74

201-Monthly Attendance Report																																12-01-2021 thru 12-31-2021			
Name	01	02	03	04	05	06	07	08	09	10	11	12	13	14	15	16	17	18	19	20	21	22	23	24	25	26	27	28	29	30	31	Attend Per Child	Class Days Per Child	Monthly Average Attendance	
X Johnson	1	1	1					1	1	1	1	1			1	1	1	1				1	1	1									15	15	100.00%
Daily Attendance Totals	1	1	1					1	1	1	1	1			1	1	1	1				1	1	1									15	15	100.00

Child's name has been updated to protect their identity.

Attendance Verification

SAMPLE Attendance Sheets

Attendance Sheet is missing:

- ✓ Physical signature by the parent
- ✓ Provider ID
- ✓ Provider Name

RESULTS:

1. Unable to identify provider
2. Unable to process
3. Initiation of Overpayment process

Child Attendance List Report

Date of Report: 01/14/2022

Child Attendance List Report for [REDACTED] (DCW ID: [REDACTED])

Program	Check In Date	Check In Time
Pre-K A -	08/31/2021	5:38 PM EDT
Pre-K A -	08/31/2021	9:42 AM EDT
Pre-K A -	08/20/2021	9:14 AM EDT
Pre-K A -	08/19/2021	5:19 PM EDT
Pre-K A -	08/19/2021	10:51 AM EDT
Pre-K A -	08/18/2021	3:52 PM EDT

Child and Provider names have been removed to protect their identity.

Attendance Verification Schedule

Verification #	Service Period Start Date	Service Period End Date	Date Verification Letter email sent to Providers (#17 onward)	Date Attendance Sheets are Due	Date Overpayment Letters Sent to Providers
1	6/21/21	7/4/21	7/23/21	8/6/21	N/A
2	7/5/21	7/18/21	8/6/21	8/20/21	N/A
3	7/19/21	8/1/21	8/20/21	9/3/21	N/A
4	8/2/21	8/15/21	4/8/22	6/12/22	6/13/22
5	8/16/21	8/29/21	4/8/22	6/12/22	6/13/22
6	8/30/21	9/12/21	4/8/22	6/12/22	6/13/22
7	9/13/21	9/26/21	4/8/22	6/12/22	6/13/22
8	9/27/21	10/10/21	4/8/22	6/12/22	6/13/22
9	10/11/21	10/24/21	4/8/22	6/12/22	6/13/22
10	10/25/21	11/7/21	4/8/22	6/12/22	6/13/22
11	11/8/21	11/21/21	4/8/22	6/12/22	6/13/22
12	11/22/21	12/5/21	4/8/22	6/12/22	6/13/22
13	12/6/21	12/19/21	4/8/22	6/12/22	6/13/22
14	12/20/21	1/2/22	4/8/22	6/12/22	6/13/22
15	1/3/22	1/16/22	4/8/22	6/12/22	6/13/22
16	1/17/22	1/30/22	4/8/22	6/12/22	6/13/22
17	1/31/22	2/13/22	3/4/22	3/23/22	4/22/22
18	2/14/22	2/27/22	3/18/22	4/6/22	5/6/22
19	2/28/22	3/13/22	4/1/22	4/20/22	5/20/22
20	3/14/22	3/27/22	4/15/22	5/4/22	6/3/22
21	3/28/22	4/10/22	4/29/22	5/18/22	6/17/22
22	4/11/22	4/24/22	5/13/22	6/1/22	7/1/22
23	4/25/22	5/8/22	5/27/22	6/15/22	7/15/22
24	5/9/22	5/22/22	6/10/22	6/29/22	7/29/22
25	5/23/22	6/5/22	6/24/22	7/13/22	8/12/22
26	6/6/22	6/19/22	7/8/22	7/27/22	8/26/22
27	6/20/22	7/3/22	7/22/22	8/10/22	9/9/22

Attendance Verification

Attendance Verification ensures program integrity & accurate payment.



QUESTIONS?