

8 Ensure Grantee Program Integrity and Accountability

Program integrity and accountability activities are integral to the effective administration of the CCDF program. Lead Agencies are required to describe in their Plan effective internal controls that ensure integrity and accountability while maintaining the continuity of services (98.16(cc)). These accountability measures should address reducing fraud, waste, and abuse, including

program violations and administrative errors.

This section includes topics on internal controls to ensure integrity and accountability and processes in place to investigate and recover fraudulent payments and to impose sanctions on clients or providers in response to fraud. Respondents should consider how fiscal controls, program integrity and accountability apply to:

-- Memorandums of understanding within the Lead Agency's various divisions that administer or carry out the various aspects of CCDF

-- MOU's, grants, or contracts to other state agencies that administer or carry out various aspects of CCDF

-- Grants or contracts to other organizations that administer or carry out various aspects of CCDF such as professional development and family engagement activities

-- Internal processes for conducting child care provider subsidy

8.1 Internal Controls and Accountability Measures To Help Ensure Program Integrity

8.1.1 Check and describe how the Lead Agency ensures that all its staff members and any staff members in other agencies who administer the CCDF program through MOUs, grants and contracts are informed and trained regarding program requirements and integrity. Check all that apply:

Train on policy manual

Describe:

The CCDF Lead Agency, the Child Care Program Office (CCPO), conducts monthly teleconferences with Child Care Assistance Program (CCAP) grantees and generally has weekly meetings with CCDF Lead Agency staff to provide topic specific information and training, provide technical assistance and program policies and procedures clarifications.

Train on policy change notices

Describe:

The CCDF Lead Agency, the Child Care Program Office (CCPO), conducts monthly teleconferences with Child Care Assistance Program (CCAP) grantees and generally has

weekly meetings with CCDF Lead Agency staff to provide topic specific information and training, provide technical assistance and program policies and procedures clarifications.

Ongoing monitoring and assessment of policy implementation

Describe:

The CCDF Lead Agency, the Child Care Program Office (CCPO), in conjunction with the Division of Public Assistance, Program Integrity and Analysis, Contracted Services Quality Assurance and Quality Assessment monitors grantees through a combination of monthly statewide random file reviews, random desk audits, and quarterly quality review meetings.

Other

Describe:

8.1.2 Lead Agencies must ensure the integrity of the use of funds through sound fiscal management and must ensure that financial practices are in place (98.68 (a)(1)). Describe the processes in place for the Lead Agency to ensure sound fiscal management practices for all expenditures of CCDF funds. Check all that apply:

Verifying and processing billing records to ensure timely payments to providers

Describe:

The CCDF Lead Agency, the Child Care Program Office (CCPO), in conjunction with the Division of Public Assistance, Program Integrity and Analysis, Contracted Services Quality Assurance and Quality Assessment, conduct monthly random reviews to include payments verified by the CCPO and CCAP grantees. The payments verified are compared to the Request for Payment submitted by the provider to ensure payments are correct and processed timely.

Fiscal oversight of grants and contracts

Describe:

The CCDF Lead Agency, the Child Care Program Office (CCPO), in conjunction with the Division of Public Assistance, Program Integrity, Contracted Services Quality Assurance

conducts annual reviews of the Child Care Assistance Program (CCAP), Alaska's statewide Child Care Resource and Referral Network (CCR&R), and Child Care Licensing grantees and CCR&R sub-grantees regarding grantee services. The grant document contains measurements to be reviewed for grantees in addition to establishing reporting requirements for spending grant funds and meeting program expectations. A site visit is conducted annually at each grantee agency for grant compliance which includes review of the grantee's work product. Additionally, the CCPO reviews monthly statistical reports and quarterly fiscal and program narrative reports to ensure established reporting requirements for spending grant funds are followed.

Tracking systems to ensure reasonable and allowable costs

Describe:

The CCDF Lead Agency, the Child Care Program Office (CCPO), in conjunction with the Department of Health and Social Services Grants and Contracts unit receives and reviews quarterly fiscal and program narrative reports to ensure spending of grant funds is reasonable and for allowable expenditures.

Other

Describe:

8.1.3 Check and describe the processes that the Lead Agency will use to identify risk in their CCDF program. Check all that apply:

Conduct a risk assessment of policies and procedures

Describe:

Establish checks and balances to ensure program integrity

Describe:

Child Care Assistance Program grant documents and policies and procedures require; the individual who verifies payment to the provider to be different than the individual who authorized the care for the family; the CCAP grantee's Local Administrator or other agency individual be assigned the caseworker if a grantee staff is a program participant;

and grantee staff are prohibited from accessing their own case and the case of relatives, friends, or other individuals with whom they have a personal relationship.

Use supervisory reviews to ensure accuracy in eligibility determination

Describe:

Child Care Assistance Program grant documents and policies and procedures require the CCAP grantee to conduct monthly supervisory reviews, provide feedback to staff and report their findings to the CCDF Lead Agency, the Child Care Program Office (CCPO).

Other

Describe:

8.1.4 Lead Agencies conduct a wide variety of activities to fight fraud and ensure program integrity. Lead Agencies are required to have processes in place to identify fraud and other program violations to ensure program integrity. Program violations can include both intentional and unintentional client and/or provider violations, as defined by the Lead Agency. These violations and errors, identified through the error-rate review process may result in payment or nonpayment (administrative) errors and may or may not be the result of fraud, based on the Lead Agency definition. Check and describe any activities that the Lead Agency conducts to ensure program integrity.

a) Check and describe all activities that the Lead Agency conducts to identify and prevent fraud or intentional program violations. Include in the description how each activity assists in the identification and prevention of fraud and intentional program violations. Include a description of the results of such activity.

Share/match data from other programs (e.g., TANF program, Child and Adult Care Food Program, Food and Nutrition Service (FNS), Medicaid) or other databases (e.g., State Directory of New Hires, Social Security Administration, Public Assistance Reporting Information System (PARIS)).

Describe

Child Care Assistance Program policies and procedures require grantees to submit a Request for Information to the CCDF Lead Agency, Child Care Program Office (CCPO) prior to an eligibility determination, when there are indicators on either the

family's or provider's application that are not adequately resolved during their interview. The CCPO accesses all other available data systems to either support or contradict the information provided. If during this research it is identified a family or provider is reporting information differently to other programs they are participating in, a referral is made to the Division of Public Assistance, Program Integrity and Analysis, Fraud Control Unit for further investigation, which includes accessing additional information and databases not accessible to the CCPO staff.

[Run system reports that flag errors \(include types\).](#)

Describe:

[Review enrollment documents and attendance or billing records](#)

Describe:

Per Child Care Assistance Program Policies and Procedures manual section 4280-1, a random review of 5% of all provider's files are to be reviewed monthly. The review includes requesting the provider's attendance records and comparing it to the Request for Payment submitted for that month. Discrepancies identified are documented and additional information requested from the provider. If it is determined an overpayment of \$100 or more occurred it is recouped. If a discrepancy is determined to potentially be an intentional program violation or fraud, the CCDF Lead Agency submits a referral to the Division of Public Assistance, Program Integrity and Analysis, Fraud Control Unit for further investigation.

[Conduct supervisory staff reviews or quality assurance reviews.](#)

Describe:

Child Care Assistance Program grant documents and policies and procedures require the CCAP grantee to conduct monthly supervisory reviews, provide feedback to staff and report their findings to the CCDF Lead Agency, the Child Care Program Office (CCPO). Review of each staff person's work identifies training needs and could identify fraudulent acts by grantee staff.

[Audit provider records.](#)

Describe:

Per Child Care Assistance Program Policies and Procedures manual section 4280-1,

a random review of 5% of all provider's files are to be reviewed monthly. The review includes requesting the provider's attendance records and comparing it to the Request for Payment submitted for that month to identify any potential intentional program violations or fraud.

[Train staff on policy and/or audits.](#)

[Describe:](#)

The CCDF Lead Agency, the Child Care Program Office (CCPO), conducts monthly teleconferences with Child Care Assistance Program (CCAP) grantees to provide topic specific information and training, provide technical assistance and program policies and procedures clarifications.

[Other](#)

[Describe:](#)

Child Care Assistance Program (CCAP) grantees do not have direct access to other state data systems. Policies and Procedures require CCAP grantee staff to submit a request for information to the CCDF Lead Agency, the Child Care Program Office (CCPO), if they believe there is a discrepancy of information submitted on the family's application and confirmed during the interview. The CCPO will access other state data systems to provide supporting or contradicting information to be addressed prior to a determination being made on a family's or provider's application.

[b\) Check and describe all activities the Lead Agency conducts to identify unintentional program violations. Include in the description how each activity assists in the identification and prevention of unintentional program violations. Include a description of the results of such activity.](#)

[Share/match data from other programs \(e.g., TANF program, CACFP, FNS, Medicaid\) or other databases \(e.g., State Directory of New Hires, Social Security Administration, PARIS\).](#)

[Describe:](#)

Child Care Assistance Program policies and procedures require grantees to submit a Request for Information to the CCDF Lead Agency, Child Care Program Office (CCPO) prior to an eligibility determination, when there are indicators on either the family's or provider's application that are not adequately resolved during their interview. The CCPO accesses all other available data systems to either support or

contradict the information provided.

Run system reports that flag errors (include types).

Describe:

Review enrollment documents and attendance or billing records

Describe:

Per Child Care Assistance Program Policies and Procedures manual section 4280-1, a random review of 5% of all provider's files are to be reviewed monthly. The review includes requesting the provider's attendance records and comparing it to the Request for Payment submitted for that month. Discrepancies identified are documented and further reviewed to determine the cause. If it is determined an overpayment of \$100 or more occurred it is recouped.

Conduct supervisory staff reviews or quality assurance reviews.

Describe:

Child Care Assistance Program grant documents and policies and procedures require the CCAP grantee to conduct monthly supervisory reviews, provide feedback to staff and report their findings to the CCDF Lead Agency, the Child Care Program Office (CCPO). Review of each staff person's work allows for errors to be identified and corrected more quickly.

Audit provider records.

Describe:

Per Child Care Assistance Program Policies and Procedures manual section 4280-1, a random review of 5% of all provider's files are to be reviewed monthly. The review includes requesting the provider's attendance records and comparing it to the Request for Payment submitted for that month to identify any errors and make necessary changes more quickly.

Train staff on policy and/or audits.

Describe:

The CCDF Lead Agency, the Child Care Program Office (CCPO), conducts monthly teleconferences with Child Care Assistance Program (CCAP) grantees to provide

topic specific information and training, provide technical assistance and program policies and procedures clarifications.

Other

Describe:

c) Check and describe all activities the Lead Agency conducts to identify and prevent agency errors. Include in the description how each activity assists in the identification and prevention of agency errors.

Share/match data from other programs (e.g., TANF program, CACFP, FNS, Medicaid) or other databases (e.g., State Directory of New Hires, Social Security Administration, PARIS).

Describe:

Run system reports that flag errors (include types).

Describe:

Review enrollment documents and attendance or billing records

Describe:

Conduct supervisory staff reviews or quality assurance reviews.

Describe:

The CCDF Lead Agency, the Child Care Program Office (CCPO), in conjunction with the Division of Public Assistance, Program Integrity and Analysis, Contracted Services Quality Assurance and Quality Assessment, conduct monthly random reviews to include review of the family's eligibility and payments verified by the CCPO and CCAP grantees. Results of the file review are provided to the grantee and CCPO for follow-up to include additional training as necessary.

Audit provider records.

Describe:

Train staff on policy and/or audits.

Describe:

Other

Describe:

8.1.5 The Lead Agency is required to identify and recover misspent funds as a result of fraud, and it has the option to recover any misspent funds as a result of errors.

a) Check and describe all activities that the Lead Agency uses to investigate and recover improper payments due to fraud. Include in the description how each activity assists in the investigation and recovery of improper payment due to fraud or intentional program violations. Include a description of the results of such activity. Activities can include, but are not limited to, the following:

- Require recovery after a minimum dollar amount of an improper payment and identify the minimum dollar amount

Describe:

The minimum amount to be pursued is \$100.00. All intentional program violations/fraud cases are referred to the Division of Public Assistance, Program Integrity and Analysis, Fraud Control Unit to investigate and if warranted pursue repayment.

- Coordinate with and refer to the other state/territory agencies (e.g., state/territory collection agency, law enforcement agency).

Describe:

All intentional program violations/fraud cases are referred to the Division of Public Assistance, Program Integrity and Analysis, Fraud Control Unit to investigate and if warranted pursue repayment.

- Recover through repayment plans.

Describe:

When an intentional program violation/fraud determination is received, the dollar amount determined to have been overpaid is generally recouped at the disqualification or intentional program violation hearing. If the full amount is not recouped at the

hearing, the order is referred to the Division of Public Assistance, Program Integrity and Analysis, Benefits Issuance and Recovery Unit to develop a repayment plan.

Reduce payments in subsequent months.

Describe:

If through a disqualification or intentional program violation hearing it is determined a family committed an intentional program violation, their benefits are reduced by 10% if it is their first intentional program violation with a dollar loss; or 20% if it is the family's second intentional program violation regardless if there is a dollar loss.

Recover through state/territory tax intercepts.

Describe:

Recover through other means.

Describe:

Alaska Permanent Fund Dividend intercept.

Establish a unit to investigate and collect improper payments and describe the composition of the unit below.

Describe:

This unit includes staff from the CCDF Lead Agency, the Child Care Program Office (CCPO), and Division of Public Assistance, Program Integrity and Analysis, Fraud Control Unit and Benefits Issuance and Recovery Unit.

Other

Describe:

b) Check any activities that the Lead Agency will use to investigate and recover improper payments due to unintentional program violations. Include in the description how each activity assists in the investigation and recovery of improper payments due to unintentional program violations. Include a description of the results of such activity. Activities can include, but are not limited to, the following:

Require recovery after a minimum dollar amount of an improper payment and identify the minimum dollar amount

Describe:

The minimum amount to be pursued is \$100.00. Repayment is pursued for all overpayments of \$100.00 or more.

- Coordinate with and refer to the other state/territory agencies (e.g., state/territory collection agency, law enforcement agency).

Describe:

- Recover through repayment plans.

Describe:

The CCDF Lead Agency, the Child Care Program Office (CCPO) conducts an incorrect payment review. When an overpayment of \$100.00 or more is identified to be recovered from a family, a claim is submitted to the Division of Public Assistance, Program Integrity & Analysis, Benefits Issuance and Recovery unit who notifies the family and develops a repayment plan. The CCPO notifies providers of overpayments and develops a repayment plan. When the provider is still participating in any CCPO program, the overpayment is recouped from the amount to be paid to them. If the provider has closed or is no longer participating, a direct payment agreement is established.

- Reduce payments in subsequent months.

Describe:

When the overpayment is being recouped from a child care provider who is participating in any CCPO program, the repayment will be recouped from the amount to be paid to them in subsequent months.

- Recover through state/territory tax intercepts.

Describe:

- Recover through other means.

Describe:

Alaska Permanent Fund Dividend intercept.

- Establish a unit to investigate and collect improper payments and describe the composition of the unit below.

Describe:

This unit includes staff from the CCDF Lead Agency, the Child Care Program Office (CCPO), and Division of Public Assistance, Program Integrity, Benefits Issuance and Recovery Unit.

- Other

Describe:

c) Check and describe all activities that the Lead Agency will use to investigate and recover improper payments due to agency errors. Include in the description how each activity assists in the investigation and recovery of improper payments due to administrative errors. Include a description of the results of such activity.

- Require recovery after a minimum dollar amount of an improper payment and identify the minimum dollar amount

Describe:

The minimum amount to be pursued is \$100.00. Repayment is pursued for all overpayments of \$100.00 or more

- Coordinate with and refer to the other state/territory agencies (e.g., state/territory collection agency, law enforcement agency).

Describe:

- Recover through repayment plans.

Establish a unit to investigate and collect improper payments.

The CCDF Lead Agency, the Child Care Program Office (CCPO) conducts an incorrect payment review. When an overpayment of \$100.00 or more is identified to be recovered from a family, a claim is submitted to the Division of Public Assistance, Program Integrity & Analysis, Benefits Issuance and Recovery unit who notifies the family and develops a repayment plan. The CCPO notifies providers of overpayments and develops a repayment plan. When the provider is still participating in any CCPO program, the overpayment is recouped from the amount to be paid to them. If the provider has closed or is no longer participating, a direct payment agreement is established.

Reduce payments in subsequent months.

Describe:

When the overpayment is being recouped from a child care provider who is participating in any CCPO program, the repayment will be recouped from the amount to be paid to them in subsequent months.

Recover through state/territory tax intercepts.

Describe:

Recover through other means.

Describe:

Alaska Permanent Fund Dividend intercept.

Establish a unit to investigate and collect improper payments and describe the composition of the unit below.

Describe:

This unit includes staff from the CCDF Lead Agency, the Child Care Program Office (CCPO), and Division of Public Assistance, Program Integrity, Benefits Issuance and Recovery Unit.

Other

Describe:

8.1.6 What type of sanction will the Lead Agency place on clients and providers to help reduce improper payments due to program violations? Check and describe all that apply:

Disqualify the client. If checked, describe this process, including a description of the appeal process for clients who are disqualified.

Describe:

A family will be disqualified from Child Care Assistance Program participation when it is determined they have committed a third intentional program violation even if there is no

dollar loss.

- Disqualify the provider. If checked, describe this process, including a description of the appeal process for providers who are disqualified.

Describe:

A provider will be disqualified from Child Care Assistance Program participation when it is determined they have committed a third intentional program violation even if there is no dollar loss.

- Prosecute criminally.

Describe:

The Division of Public Assistance, Program Integrity and Analysis, Fraud Control Unit may refer an accused family or provider to the appropriate authorities for criminal action in state or federal court.

- Other.

Describe:

Appendix A: Background Check Waiver Request Form

Lead Agencies may apply for a temporary waiver for certain background check requirements if milestone prerequisites have been fully implemented. These waivers will be considered "transitional and legislative waivers" to provide transitional relief from conflicting or duplicative requirements preventing implementation, or an extended period of time in order for the state/territory legislature to enact legislation to implement the provisions (98.19(b)(1)) These waivers are limited to a one-year period and may be extended for at most one additional year from the date of initial approval.

Approval of these waiver requests is subject to and contingent on OCC review and approval of responses in section 5 questions 5.4.1 -- 5.4.4 to confirm that the milestones are met. If milestone prerequisites are not met, the waiver request will not be approved. Approved waivers would begin October 1, 2018 through September 30, 2019. If approved, States and Territories will have the option to renew these waivers for one additional year as long as progress is demonstrated during the initial waiver period. Separate guidance will be issued later on the timeline and criteria for requesting the waiver renewal.

Overview of Background Check Implementation deadlines

Original deadline for implementation (658H(j)(1) of CCDBG Act): September 30, 2017

Initial one-year extension deadline (658H(j)(2) of CCDBG Act): September 30, 2018

One-year waiver deadline (45 CFR 98.19(b)(1)(i)): September 30, 2019

Waiver deadline one-year renewal (45 CFR 98.19(b)(1)(ii)): September 30, 2020

Waiver approval for new (prospective) staff, existing staff or staff hired provisionally until background checks are completed, are subject to and contingent upon the OCC review and approval of responses to 5.4.9 that demonstrate that the state/territory requires: (1) the provider to submit the background check request before the staff person begins working; and (2) pending the results of the background check, the staff person must be supervised at all times by an individual who has completed the background check.

To submit a background check waiver request, complete the form below.

Check and describe each background check provision for which the Lead Agency is requesting a time-limited waiver extension.

- Appendix A.5:** National Crime Information Center (NCIC) National Sex Offender Registry (NSOR) search requirements for new or prospective staff. (See related question at 5.4.5 (a))

Describe the provision from which the state/territory seeks relief.

The CCDF Lead Agency, the Child Care Program Office (CCPO), seeks relief from 5.4.5(a), the provision of National Crime Information Center (NCIC) National Sex Offender Registry (NSOR) search requirements for new or prospective staff.

Describe how a waiver of the provision will, by itself, improve the delivery of child care services for children

Waiver of the provision will support Alaska's child care providers, already struggling to recruit and retain qualified staff, to be able to continue to hire staff as soon as possible while the CCDF Lead Agency, the Child Care Program Office (CCPO) continues to

collaborate and coordinate with the federal Office of Child Care and other states regarding this requirement and process for compliance.

[Certify and describe how the health, safety, and well-being of children served through assistance received through CCDF will not be compromised as a result of the waiver.](#)

This provision is new under the reauthorization of the Child Care and Development Block Grant Act (CCDBG) of 2014. The health, safety, and well-being of children served through CCDF has been and is cared for through the various other criminal history checks completed.

Appendix A.6: National Crime Information Center (NCIC) National Sex Offender Registry (NSOR) search requirements for existing staff. (See related question at 5.4.5 (b))

[Describe the provision from which the state/territory seeks relief.](#)

The CCDF Lead Agency, the Child Care Program Office (CCPO), seeks relief from 5.4.5(b), the provision of National Crime Information Center (NCIC) National Sex Offender Registry (NSOR) search requirements for existing staff.

[Describe how a waiver of the provision will, by itself, improve the delivery of child care services for children](#)

Waiver of the provision will support Alaska's child care providers, already struggling to recruit and retain qualified staff, to be able to continue to hire staff as soon as possible while the CCDF Lead Agency, the Child Care Program Office (CCPO) continues to collaborate and coordinate with the federal Office of Child Care and other states regarding this requirement and process for compliance.

[Certify and describe how the health, safety, and well-being of children served through assistance received through CCDF will not be compromised as a result of the waiver.](#)

This provision is new under the reauthorization of the Child Care and Development Block Grant Act (CCDBG) of 2014. The health, safety, and well-being of children served through CCDF has been and is cared for through the various other criminal history checks completed.

Appendix A.7: Interstate criminal registry or repository check for new or prospective staff. (See related question at 5.4.6 (a))

Describe the provision from which the state/territory seeks relief.

The CCDF Lead Agency, the Child Care Program Office (CCPO), seeks relief from 5.4.6(a), the provision of Interstate criminal registry or repository check for new or prospective staff.

Describe how a waiver of the provision will, by itself, improve the delivery of child care services for children

Waiver of the provision will support Alaska's child care providers, already struggling to recruit and retain qualified staff, to be able to continue to hire staff as soon as possible while the CCDF Lead Agency, the Child Care Program Office (CCPO) continues to collaborate and coordinate with the federal Office of Child Care and other states regarding this requirement and process for compliance.

Certify and describe how the health, safety, and well-being of children served through assistance received through CCDF will not be compromised as a result of the waiver.

This provision is new under the reauthorization of the Child Care and Development Block Grant Act (CCDBG) of 2014. The health, safety, and well-being of children served through CCDF has been and is cared for through the various other criminal history checks completed.

Appendix A.8: Interstate criminal registry or repository check for existing staff. (See related question at 5.4.6 (b))

Describe the provision from which the state/territory seeks relief.

The CCDF Lead Agency, the Child Care Program Office (CCPO), seeks relief from 5.4.6(b), the provision of Interstate criminal registry or repository check for existing staff.

Describe how a waiver of the provision will, by itself, improve the delivery of child care services for children

Waiver of the provision will support Alaska's child care providers, already struggling to recruit and retain qualified staff, to be able to continue to hire staff as soon as possible while the CCDF Lead Agency, the Child Care Program Office (CCPO) continues to collaborate and coordinate with the federal Office of Child Care and other states regarding this requirement and process for compliance.

Certify and describe how the health, safety, and well-being of children served through assistance received through CCDF will not be compromised as a result of the waiver.

This provision is new under the reauthorization of the Child Care and Development Block Grant Act (CCDBG) of 2014. The health, safety, and well-being of children served through CCDF has been and is cared for through the various other criminal history checks completed.

Appendix A.11: Interstate child abuse and neglect registry check for new or prospective staff. (See related question at 5.4.8 (a))

Describe the provision from which the state/territory seeks relief.

The CCDF Lead Agency, the Child Care Program Office (CCPO), seeks relief from 5.4.8(a), the provision of Interstate Child Abuse and Neglect Check Registry Requirements for new or prospective staff.

Describe how a waiver of the provision will, by itself, improve the delivery of child care services for children

Waiver of the provision will support Alaska's child care providers, already struggling to recruit and retain qualified staff, to be able to continue to hire staff as soon as possible while the CCDF Lead Agency, the Child Care Program Office (CCPO) continues to collaborate and coordinate with the federal Office of Child Care and other states regarding this requirement and process for compliance.

Certify and describe how the health, safety, and well-being of children served through assistance received through CCDF will not be compromised as a result of the waiver.

This provision is new under the reauthorization of the Child Care and Development Block Grant Act (CCDBG) of 2014. The health, safety, and well-being of children served through CCDF has been and is cared for through the various other criminal history checks completed.

Appendix A.12: Interstate child abuse and neglect registry check for existing staff. (See related question at 5.4.8 (b))

Describe the provision from which the state/territory seeks relief.

The CCDF Lead Agency, the Child Care Program Office (CCPO), seeks relief from 5.4.8(b), the provision of Interstate Child Abuse and Neglect Check Registry Requirements for existing staff.

Describe how a waiver of the provision will, by itself, improve the delivery of child care services for children

Waiver of the provision will support Alaska's child care providers, already struggling to recruit and retain qualified staff, to be able to continue to hire staff as soon as possible while the CCDF Lead Agency, the Child Care Program Office (CCPO) continues to collaborate and coordinate with the federal Office of Child Care and other states regarding this requirement and process for compliance.

Certify and describe how the health, safety, and well-being of children served through assistance received through CCDF will not be compromised as a result of the waiver.

This provision is new under the reauthorization of the Child Care and Development Block Grant Act (CCDBG) of 2014. The health, safety, and well-being of children served through CCDF has been and is cared for through the various other criminal history checks completed.

Appendix A. 13: New staff hired to work provisionally until background checks are completed. (See related question at 5.4.9)

Describe the provision from which the state/territory seeks relief.

The CCDF Lead Agency, the Child Care Program Office (CCPO), seeks relief from 5.4.9, the provision requiring that a prospective child care staff member may not begin work until one of the following results have been returned as satisfactory: either the FBI fingerprint check or the search of the state/territory criminal registry or repository using fingerprints in the state/territory where the staff member resides.

Describe how a waiver of the provision will, by itself, improve the delivery of child care services for children

Waiver of the provision will support Alaska's child care providers, already struggling to recruit and retain qualified staff, to be able to continue to hire staff as soon as possible with a provisional clearance while awaiting the final eligibility determination.

Certify and describe how the health, safety, and well-being of children served through assistance received through CCDF will not be compromised as a result of the waiver.

The CCDF Lead Agency, the Child Care Program Office (CCPO), has been operating under this provision since the Alaska Background Check Program/ background check

regulations under 7 AAC 10 were put in place in February 2008. The CCPO has effectively addressed any concerns or issues that have arisen after a provisional clearance has been issued through the background check variance process or through coordination with the provider to terminate association with the individual with a barring crime or condition.