



COVID-19 Emergency Childcare Assistance Program Guidelines

January 29, 2021



These program guidelines have been adopted to govern the implementation of the Town's COVID-19 Emergency Childcare Assistance Program. Funding for this program is provided by the U.S. Department of Housing and Urban Development and Connecticut Department of Housing through the Small Cities Community Development Block Grant-COVID19 (SC-CDBG-CV) program.


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1 INTRODUCTORY PROVISIONS

1.1 PROGRAM OBJECTIVES

The COVID-19 Emergency Childcare Assistance program will help low- and moderate-income residents withstand the on-going pandemic by providing assistance with childcare costs. It is the Town's intent to provide the greatest range of assistance to as many residents as possible through the financing mechanisms established herein.

1.2 APPLICABILITY

The eligibility criteria, procedures and regulations outlined in this document shall be used to implement the COVID-19 Emergency Childcare Assistance Program, including but not limited to any current or future grants from the Connecticut Department of Housing Small Cities Community Development Block Grant-COVID19 (SC-CDBG-CV) funds.

1.3 PROGRAM ADMINISTRATION

The Town's COVID-19 Emergency Childcare Assistance Program will be administered through the Department of Planning and Development and the Department of Human Services. The Program Coordinator or his or her designee will be responsible for the operation of the program on a day-to-day basis.

1.4 DUPLICATION OF BENEFITS

Pursuant to Section 312 of the Stafford Act as amended by the Disaster Recovery Reform Act of 2018 (DRRA), funds provided through the Resident Assistance Program shall not be used to duplicate benefits received from other programs, including but not limited to federal, state and local government, nonprofit organizations and faith-based groups. A duplication of benefits (DOB) occurs when a person, household, business, government, or other entity receives financial assistance from multiple sources for the same purpose, and the total assistance received for that purpose is more than the total need for assistance. Policies and procedures to prevent the duplication of benefits are established in Section 3 of these Program Guidelines.

1.5 CT DEPARTMENT OF HOUSING REGULATIONS

The Town of Mansfield's COVID-19 Resident Assistance Program will comply with all regulations set forth by the State of Connecticut Department of Housing's Small Cities Program. This includes, but is not limited to, the following regulations: environmental protection; financial compliance matters; civil rights and equal opportunity; Section 3, Small Businesses, and Minority and Women-Owned Business goals; procurement; and labor and safety laws and regulations.

1.6 OMB COST PRINCIPLES

All program expenses shall conform to the OMB Cost Principles established in 2 CFR § 200, which requires all costs to be "necessary and reasonable for the performance of the Federal award.

1.7 CHANGES TO PROGRAM GUIDELINES

The General Program Guidelines established in this document may be amended by the Department of Planning and Development with the consent of the Town Manager. Such changes shall be reflected through issuance of an updated guidance document signed and dated by the Town Manager.

1.8 ABBREVIATIONS

The following abbreviations are used throughout this document

HUD	U.S. Department of Housing and Urban Development
CTDOH	Connecticut Department of Housing
DOB	Duplication of Benefits

2 PROGRAM ELIGIBILITY

To be eligible for participation in the Emergency Childcare Assistance Program, applicants must meet the criteria established in this Section.

2.1 RESIDENCY

The applicant must be a resident of Mansfield to participate. Proof of residency will be required as part of the application process. Examples of proof of residency include but are not limited to: driver's license, lease, utility bill, etc.

2.2 HOUSEHOLD INCOME REQUIREMENTS

A. Maximum Household Income Limits

Household income must be at or below 80% of Area Median Income for the Hartford-West Hartford-East Hartford, CT Metropolitan Statistical Area (MSA) as established by HUD.

Annual income limits shall be obtained from the CTDOH website (<http://www.ct.gov/doh/cwp/view.asp?a=4513&Q=531656&PM=1>).

B. Calculation of Income

Income will be calculated as gross annual income, including the income of all occupants age 18 and older that is anticipated to be received during the coming 12-month period. Gross income shall include, but not be limited to:

1. Wages/salaries of applicants, including overtime, part-time earnings, bonuses and commissions
2. Social Security Benefits
3. Annuities
4. Trusts
5. Retirement Benefits
6. Disability Benefits
7. Unemployment Benefits
8. Severance Pay
9. Workers' Compensation

10. Welfare Payments

11. Child Support and Alimony

12. Interest and Dividends from all Savings, Stocks, Bonds or Similar Income Producing Assets and Rental Income

C. Exemptions

Calculation of gross annual household income shall not include any income that is exempted by HUD or the State of Connecticut.

D. Self-Employed Applicants

For self-employed applicants, income will be calculated by gross adjusted income. Copies of the past two years income tax returns will be required.

E. Verification of Income

1. All household income sources must be verified through source documentation (i.e. employers, banks, social security, etc.).
2. A copy of the most current federal income tax return is required. If the most recent return does not reflect current income status due to a change in employment status/salary, the applicant shall supply wage information for the prior three months to document current income levels.
3. If an applicant/tenant does not pay income tax, alternative documentation on all sources of income must be provided, (i.e. social security and pension statements, employer verification of income, etc.).
4. If an application is being processed after June 30th, year-to-date income documentation must also be submitted.
5. If more than 12 months has passed from the time initial income verification is completed and the start of work, applicants shall be required to submit additional source documentation to confirm that they remain in compliance with income limitations prior to execution of the assistance agreement.
6. The Program Coordinator or designee will verify that the application for assistance complies with maximum household income limits by using the HUD CPD Income Calculator (<https://www.hudexchange.info/incomecalculator/>).

2.3 COVID-19 IMPACTS

Applicants must demonstrate that they have experienced a financial impact due to the COVID-19 virus. Examples include, but are not limited to:

- Reduction in income due to layoff/furlough, reduction in hours, pay cut, etc.
- Reduction in income due to lack of childcare options and associated inability to work
- Reduction in income due to contraction of or exposure to the COVID-19 virus
- Increase in costs/expenses, such as food or childcare. For example, an increase in childcare costs due to the closure of schools; need to use private summer camps/childcare providers due to cancellation of Town summer day camp and before/after school childcare, etc.
- Increase in costs/expenses due to contraction of or exposure to COVID-19 virus

Documentation of the financial impact must be provided as part of the application. Examples include but are not limited to: documentation of changes in income (tax returns, pay stubs, etc.); documentation of increased expenses through invoices (pre-pandemic and current); etc.

2.4 CHILDCARE REQUIREMENTS

A. Cares 4 Kids Assistance. Applicants must provide documentation that they either:

1. Do not qualify for Cares 4 Kids Assistance; or
2. They have applied for and been denied assistance from the Cares 4 Kids program.

B. Licensed Childcare Provider. Applicants must provide documentation that they are using a licensed childcare provider (including licensed family childcare providers) or a license-exempt program administered by a private school, the Mansfield Board of Education, or the Town of Mansfield.

C. Authorization of Childcare Provider to Provide Information. Applicants shall be required to authorize their childcare provider to disclose any information needed to determine program eligibility and maximum benefit, including but not limited to cost of service and any payments received for previous services by parties other than the applicant.

2.5 CONFLICT OF INTEREST

No member of the governing body and no employee or agent of the Town of Mansfield who exercises policy, decision-making functions, has responsibility in connection with the planning and implementation of the Community Development Program, or has inside information regarding the program shall directly or indirectly benefit from this program. This prohibition shall continue for one year after an individual's relationship with the Town of Mansfield ends.

3 AMOUNT OF ASSISTANCE

3.1 PERIOD OF ASSISTANCE

Low and moderate-income eligible applicants will receive assistance with childcare costs for up to **six months**. All assistance provided through this program must be concluded by December 31, 2022.

3.2 MAXIMUM BENEFIT PER HOUSEHOLD

The maximum amount of childcare assistance shall be **\$9,000** per household **less** any assistance with childcare costs received from other sources, including but not limited to federal, state, and local government; not-for-profit organizations; and faith-based institutions.

3.3 APPLICANT SHARE OF CHILDCARE COSTS

The applicant shall be responsible for the following costs:

- A. Monthly childcare costs equivalent to 7% of gross monthly income
- B. The remaining balance of childcare costs after the maximum benefit per household has been reached.

3.4 TERMINATION OF ASSISTANCE

Failure of the applicant to pay their required share of childcare costs to the provider is grounds for termination of the assistance.

4 CALCULATING MAXIMUM AWARD / DUPLICATION OF BENEFITS PROCEDURES

4.1 IDENTIFY APPLICANT'S TOTAL NEED

- A. Applicants are required to indicate total need in the application for assistance. Need shall be determined based on actual childcare costs as evidenced by documentation from the childcare provider. Such documentation includes but is not limited to weekly/monthly rates charged by the provider and previous invoices from the provider.
- B. The Program Coordinator or designee must verify that the applicant's request is associated with an action to prevent, prepare for, or respond to coronavirus. Applicable supporting documentation shall be maintained in the record of assistance.
- C. All costs included in total need must be reasonable and necessary. The applicant must provide applicable supporting documentation.
- D. The assessment of total need must consider in-kind donations of materials or services that are known to the Town at the time it calculates total need and makes the award. In-kind donations are non-cash contributions, such as donations of professional services, use of construction equipment, or contributions of building materials. In-kind donations are not "financial assistance" that creates a DOB under the Stafford Act, but they do reduce the amount of CDBG-CV assistance for unmet need because the donated goods or services reduce activity costs.
- E. CDBG-CV funds may not be used to reimburse costs paid by subsidized loans and the calculation of total need may not include such costs.

4.2 IDENTIFY TOTAL ASSISTANCE RECEIVED OR ANTICIPATED

- A. Applicants must indicate total assistance received or anticipated in the application for assistance. This includes tuition waivers and reductions through other programs such as the school readiness program and the child day care grant.
- B. Applicants must provide applicable supporting documentation for any sources of funding cited in the total assistance received or anticipated calculation.
- C. The childcare provider shall certify whether any parties other than the applicant have previously provided payment for services on their behalf and the amount of such payments.
- D. The Program Coordinator shall determine and document the amount of assistance with childcare services, if any, received through the Town's Fee Waiver Program.
- E. The Program Coordinator or designee must review and evaluate applicant-provided data regarding total assistance received or anticipated and request clarification and/or additional supporting documentation to address any inconsistencies or omissions.
- F. Types of Resources Included in Total Assistance:

1. Total assistance includes resources such as cash awards, insurance proceeds, grants, and loans received or anticipated by each CDBG–CV applicant, including awards under local, state or federal programs and from private or nonprofit charity organizations. “Anticipated” assistance means assistance likely to be received by acting reasonably to evaluate need and the resources available to meet that need.
2. Subsidized Loans
 - a. Subsidized loans (including forgivable loans) are loans other than private loans. Subsidized loans may also be available from other sources. Subsidized loans are assistance that must be included in the DOB analysis, unless an exception regarding declined or cancelled subsidized loans applies.
 - b. Declined or cancelled subsidized loans are not a duplication and are not included in the DOB analysis.
3. Total assistance does not include personal assets such as money in a checking or savings account (excluding insurance proceeds or disaster assistance deposited into the applicant’s account); retirement accounts; credit cards and lines of credit; in-kind donations (although these non-cash contributions known to the Town reduce total need); and private loans.

4.3 EXCLUDE NON-DUPLICATIVE ASSISTANCE

- A. Applicants must indicate non-duplicative assistance received or anticipated in the application for assistance. For example, an applicant has received fee reductions from the Town of Mansfield totaling \$2,000, but only \$500 of those reductions were for before/after school care. The remaining \$1,500 would be considered non-duplicative assistance.
- B. The Program Coordinator or designee must review and evaluate applicant-provided data regarding non-duplicative assistance. The grantee must request clarification and/or additional supporting documentation to address any inconsistencies or omissions.
- C. Exclude assistance that is:
 1. Provided for a different purpose.
 2. Provided for the same purpose (eligible activity), but for a different, allowable use (cost).

4.4 IDENTIFY DUPLICATION OF BENEFITS AMOUNT AND CALCULATE THE TOTAL CDBG-CV AWARD

- A. After evaluating and verifying applicant-provided data, the Program Coordinator or designee shall use the Program Eligibility and Authorized Assistance Worksheet and Duplication of Benefits Calculation Worksheets (Appendices A & B) to identify the DOB amount and calculate the total CDBG–CV award.
- B. Steps
 1. Identify total potential need, which is defined as the gap between the total cost of childcare and affordable childcare (7% of household income) over the assistance period. See Section 3.3 for information on applicant share of childcare costs.
 2. Identify total assistance (Section 4.2)
 3. Subtract exclusions from total assistance to determine the amount of the DOB (Section 4.3)

4. Subtract the amount of the DOB from the amount of the total potential need to determine the total unmet need.
5. Determine the approved assistance amount, which shall be the total unmet need or the program cap of \$9,000, whichever is less.
6. Confirm availability of funds for full assistance award prior to issuance of formal award letter.

4.5 EXECUTE AGREEMENT FOR ASSISTANCE WITH APPLICANT

- A. The Assistance Agreement (Appendix C) between the Town and the applicant shall include the following provisions:
1. All additional funds received will be reported to the Town within 15 calendar days. If the additional funds are deemed to be duplicative, the award will be reduced and/or the applicant will be required to repay any disbursed duplicative benefit.
 2. One year after the completion of the activity for which funds were awarded, the applicant must report and certify whether additional funds were received for coronavirus-related expenses, the amount, and when funds were received. If additional funds were received that are determined to be duplicative, the applicant shall be required to repay any disbursed duplicative benefit.

4.6 REASSESS UNMET NEED WHEN NECESSARY

If other resources become available to pay for the costs of an activity, thereby reducing the need for CDBG-CV funding, the Town shall reevaluate the Total Assistance available calculation and adjust the CDBG-CV award accordingly.

5 APPLICATION PROCESS

5.1 PROGRAM MARKETING

- A. The Town will solicit applications from residents impacted by COVID-19 by working with community partners including but not limited to Mansfield Human Services, Mansfield Public Schools, local childcare providers, houses of worship and non-profit organizations through such means as press releases, direct mailings, public notices, email and web notifications, etc.
- B. The Town will affirmatively market the Program to residents least likely to apply for funding by working with community partners as described above.
- C. A brochure and application package will be developed and provided to prospective applicants.
- D. Application and outreach materials will be provided in the following languages: English, Spanish, Mandarin and Arabic. The Town will also work to provide oral translation services as needed for applicants.
- E. The Program Coordinator or designee will be available to meet with prospective participants to explain the program, its requirements, and the process.

5.2 APPLICATION REVIEW

Applications and support documentation will be accepted on an on-going, continual basis.

- A. Application Submission.** Applications will be received and numbered sequentially.

- B. Incomplete Applications.** Applications will be reviewed in the order in which they are received, to the extent possible, from the information provided. Applicants will be informed in writing of additional information required. Delays in processing due to failure of applicants to provide information will not be allowed to delay the processing of other, later applicants. Failure to provide requested information within 90 days of notice will result in rejection of the application.
- C. Complete Applications.** Once an application has been certified as complete, Town staff will review the application and determine whether it meets program eligibility requirements.
- D. Approval for Assistance.** Applicants will receive written notice of the eligibility determination and the assistance amount to be provided. Applications will be processed on a first-come, first-served basis once eligibility is confirmed until the funding is exhausted.
- E. Assistance Agreement.** Applicants approved for program participation must execute an assistance agreement prior to receiving any assistance per Section 4.5 and 4.6.

6 PAYMENT PROCESS (EMERGENCY CHILDCARE ASSISTANCE)

6.1 CHILDCARE PROVIDER

Upon issuance of the approval for assistance, the Town will contact the childcare provider identified in the application for a W-9 form and set the vendor up for payment in the Town's system. A purchase order for the maximum assistance amount shall be processed once the assistance agreement is finalized.

All childcare providers must comply with applicable requirements imposed by or pursuant to Title VI of the Civil Rights Act of 1964 and Title VIII of the Civil Rights Act of 1968.

6.2 REQUEST FOR PAYMENT

The program participant shall provide the following documentation from the childcare provider along with a written request for payment within five (5) days of receiving an invoice for services:

- A. Invoice from the childcare provider including the period for services rendered.
- B. Written certification from the childcare provider that payment for the services has not been received and is not anticipated to be received from another organization or individual.
- C. Written certification from the program participant acknowledging that they:
 1. Have not received any financial assistance that would constitute a duplication of benefits pursuant to Section 4;
 2. Will pay their share of the invoice per the assistance agreement; and
 3. Are solely responsible for any late payment fees associated with their portion of the payment.

6.3 AUTHORIZATION TO PAY

Upon receipt of the request for payment and associated documentation, the Program Coordinator shall process the Town's portion of the payment subject to any reductions required due to Duplication of Benefits per the Assistance Agreement. The check shall be made payable to and sent directly to the

childcare provider. Checks will be issued and mailed pursuant to the twice per month schedule for check production established by the Department of Finance.

7 GRIEVANCE RESOLUTION

The overall program is designed to minimize opportunities for misunderstandings. All participants are informed of the precise guidelines for determining eligibility in the program and the program procedures.

However, it is possible that conflicts may still arise during implementation of the Emergency Childcare Assistance Program. Responsibility for grievance resolution shall be assigned to the Program Coordinator. The Town Manager will act as the final appeal board if necessary. Procedures for grievance resolution are outlined below.

7.1 STAFF RESPONSIBILITIES

The Program Coordinator, aided by assigned staff, has overall responsibility for program administration and full responsibility for participant eligibility and selection.

7.2 INFORMAL MEDIATION

If an agreement cannot be reached between program staff and applicant/program participant, the Program Coordinator shall have the responsibility of mediating disputes. Every attempt will be made to have misunderstandings or disputes resolved within this framework as soon as possible.

A. Meeting of All Parties. At the earliest opportunity, a meeting is held with all parties present.

1. Each party will be allowed to describe the situation, after which the Program Coordinator summarizes the points of dispute.
2. Each point is addressed in turn and either resolved on the spot or referred for later consideration by the Program Coordinator at a specified time.
3. The meeting should also include a discussion of how the misunderstanding or miscommunication occurred so that the situation can be set aside and progress on the rehabilitation continue.

B. Documentation. The Program Coordinator will prepare a memo for the case file which records the points of dispute, the discussions which took place, and how the dispute was resolved.

7.3 FORMAL MEDIATION

Grievances which cannot be resolved through the informal process described above will be treated as Formal Complaints. Formal Complaints shall be made in writing.

If an applicant/program participant feels aggrieved by an action of the program staff, the owner should submit a written appeal to the Director of Planning and Development. The Director will determine if it is in regard to factual judgments, personal or professional conduct, or subjective interpretations of policy. The Director will respond in writing to the applicant.

7.4 APPEALS

Grievances which cannot be resolved through the informal or formal mediation process will be referred to the Town Manager. If the Town Manager determines, upon review of the case files, that the complaint is appropriate for review, the Town Manager will conduct a resolution meeting. Upon making a determination regarding the Grievance, a memo will be prepared for the case file regarding the dispute and the outcome.

8 PROGRAM ADMINISTRATION

8.1 APPLICANT RECORDS

The Town shall maintain the following records for each applicant until such time as the SC-CDBG-CV grant is monitored and closed, or by the CT Freedom of Information Act, whichever is longer.

- A. Application for Assistance, including supporting documentation and certification of other assistance received or anticipated
- B. Documentation of Total Need
 - 1. Documentation to verify that the applicant's request is associated with an action to prevent, prepare for, or respond to coronavirus.
 - 2. Documentation that all costs included in total need are reasonable and necessary.
- C. Duplication of Benefits Calculation Worksheet that includes:
 - 1. Identification of unmet need
 - 2. Identification of all sources of assistance provided to applicant
 - 3. Identification of those sources that are duplicative (with comments as needed)
 - 4. Final award calculation
- D. Supporting Documentation for any sources of funding cited by the applicant as assistance received or anticipated.
- E. Letter establishing eligibility/award.
- F. Assistance Agreement
- G. Payment Authorization, associated certifications/documentation, and records of payment
- H. Any correspondence and documentation related to a grievance.

8.2 MONITORING AND OVERSIGHT

The Program Coordinator will monitor compliance with the subrogation agreement/clause for one year following the completion of the activity for which funds were awarded pursuant to the requirements of the Assistance Agreement between the Town of Mansfield and CT Department of Housing. Documentation of such monitoring shall be maintained in the applicant's file.

8.3 REPAYMENT

If it is determined that the applicant is required to repay any disbursed duplicative benefit, the following procedures shall apply.

- A. The Program Coordinator shall notify the applicant in writing of the determination of duplicative benefits and provide instructions requiring repayment of the duplicative benefit within 30 days of the date of the determination.
- B. Failure to repay the duplicative benefit shall be a violation of the assistance agreement and subject to the penalties identified therein.

9 EXHIBITS

The following exhibits will be added to the document upon completion.

- A. Program Eligibility and Authorized Assistance Worksheet (Town)
- B. Duplication of Benefits Worksheet (Town)
- C. SC-CDBG-CV Assistance Agreement