



September 20, 2019

MEMORANDUM - 2019-005

TO: Early Learning Coalition Executive Directors and RCMA Executive Director

FROM: Shan Goff, Executive Director

SUBJECT: 12-Month Eligibility-Loss in Purpose for Care

The purpose of this memo is to provide coalitions and RCMA with guidance related to 12-month eligibility and loss of purpose for care.

The Administration of Children and Families (ACF), Office of Child Care (OCC) conducted its first ever onsite monitoring of the Office of Early Learning's (OEL) administration of the Child Care Development Fund (CCDF) on February 12-14, 2019. OEL was found to be compliant with all requirements except one. OEL received a preliminary finding that the State of Florida had not met the 12-month eligibility determination and redetermination requirements associated with section 98.21(a)(1), Code of Federal Regulations (CFR). The finding noted OEL's allowance of coalitions to consider work and/or education hours falling below 20 hours per week as a loss in purpose for care. However, that is not the intent of the federal regulations.

In accordance with the federal regulations –

If a child met all of the requirements on the date of the most recent eligibility determination or redetermination, the child shall be considered eligible to receive the same level of services regardless of any reduction in work, training or education hours as long as the parent is still working or attending training or education (45CFR 98.21(a)(1)(ii)(D)).

As such, a reduction in work and/or education hours below 20 hours per week that occurs during a family's 12-month eligibility authorization period will not be considered a loss in purpose for care and therefore the 3-month period to re-establish their purpose for care will not be applied. The family will remain eligible under these circumstances and the coalition will continue providing services to the family at the same level of care for the duration of the 12-month authorization. If necessary, OEL intends to make clarifying revisions to Rule 6M-4.200, F.A.C., through future rule promulgation.

If you have any questions about this memo please submit to OEL.Questions@oel.myflorida.com.

SG/kkm