

## Policy Communiqué # 12-03 Guidelines for Performing Case Transfers

This is a message from the Division of Policy.

**Title:** Guidelines for Performing Case Transfers

**Date:** 02/08/12

**Priority:** High

**Category:** Informational

**Action Required:** No

**Response Required:** No

### **Purpose:**

The purpose of this communiqué is to inform Child Care Information Services (CCIS) agencies of guidelines to follow when preparing to transfer an active Low-income or Former TANF case to a different CCIS agency. These guidelines also apply to *Intra-county* case transfers performed within Philadelphia or Allegheny counties, including child care cases related to the County Assistance Office, i.e. the Temporary Assistance for Needy Families or Food Stamps/Supplemental Nutrition Assistance Program child care programs.

### **Background:**

Several CCIS agencies have informed the Office of Child Development and Early Learning of some concerns they have regarding the receipt of transferred cases with incomplete information or outstanding eligibility issues. As a result, we have developed guidelines for all CCIS agencies to follow when preparing to transfer a case to a different CCIS agency, with the intent of making the case transfer a more seamless process for all parties involved.

### **Discussion:**

**Effective immediately**, all CCIS agencies must follow the guidelines as outlined below.

After the sending CCIS ensures there are no outstanding eligibility issues or missing information (per the situations listed below), the sending CCIS must take the following steps when transferring a case to the new CCIS:

1. Confirm the parent/caretaker (p/c) actually moved and did not change plans or decide to stay at the same address. Proof of address must be received by the sending CCIS and updated in PELICAN CCW before the case is transferred.
2. Ensure the children will continue to need care at the new CCIS.
3. Call the receiving CCIS agency and discuss the case being transferred, including whether any of the following situations currently exist in the case. **Both CCISs must reach an agreement on the date to transfer the case**. The sending CCIS should address and resolve any of the situations listed below **prior** to transferring a case to the new CCIS agency unless the receiving agency agrees to the transfer.
  - The Application is pending (if p/c submitted an application with your CCIS and moves prior to the 30-day application period).
  - The Redetermination is pending (today's date is within six weeks of the Redetermination due date).
  - It is not certain that the p/c is meeting the work hour requirement and will remain eligible.

- The case requires sending of an Adverse Action (AA) Notice, but one has not yet been generated.

NOTE: PELICAN CCW will not allow the transfer of a case currently under AA.

- A Missing Information Letter was sent and the timeframe has not expired, i.e. verification is outstanding.
- Only one child is receiving care and that child is turning 13 years old within the next 30 days.
- The case is within a break-in-activity eligibility period (i.e. involuntary job loss, maternity leave, p/c disability leave, etc.) that will expire within the next 30 days.

EXAMPLE: An active case is on Day 40 of the 60-day involuntary job loss eligibility period when the p/c verifies her family's move to a different county. The CCIS realizes that the family's eligibility status may soon change so it considers delaying the transfer of the case to the new CCIS. On the same day, the sending CCIS contacts the receiving CCIS to discuss the case transfer. Both CCISs agree that the transfer should not occur until after the p/c confirms her return to employment and maintains her eligibility OR the AA notice sent on day 61 is resolved (by the p/c confirming her return to employment within the 13-day notice period). If, as a result of the AA notice, the case becomes ineligible and closes, there is no longer a need to transfer the case to the receiving CCIS.

- An outstanding overpayment, referral to the Office of Inspector General (OIG) or client appeal should ***not*** prohibit transferring the case, but the sending CCIS must discuss these situations with the receiving CCIS before completing the transfer. The sending CCIS is still responsible for collecting its portion of the overpayment and/or following through with the OIG investigation or hearing results.
- Today's date is within 30 days of the end of the current fiscal year.

4. Set a date **agreeable to both CCIS agencies** for the transfer to be effective.

NOTE: When setting a case transfer date, only use a Monday date so the co-payment continues to be assessed properly in the system.

5. Fax the most recent application or redetermination paperwork, including the Employment Verification form, the Training Verification form or Education Verification form, if applicable; Release of Information form, verification of family composition and **proof of address in the new county** to the receiving CCIS agency.

6. Inform the p/c that payment for care may not be continuous if the provider does not have a provider agreement or meet agreement requirements.

NOTE: The receiving CCIS may suspend enrollments when a case transfer occurs and it does not yet have a provider agreement in place for the new provider.

#### **Next Steps:**

1. Share this information with appropriate staff.
2. Direct questions to your Subsidy Coordinator.