

## Guidance on Administering B-3 Seats 2021-2022

For the 2021-2022 academic year, Louisiana awarded 2,970 B-3 seats across 22 Ready Start Networks. This guidance document provides information on and requirements for administering B-3 Seats for the second year of the pilot.

### Planning Document

Each Ready Start Network receiving B-3 Seats will complete a B-3 Seats Planning Document that includes:

- Centers with whom the Ready Start Network will partner and rationale for partnership
- Approximated allocation of seats and age group by site
- Budget draft
- Partnership agreement draft
- Other responses to planning questions, such as cost of care per age group, requirements for partnership agreement and rationale, and internal business office planning

Each Ready Start Network will submit this planning document to the Department by June 14, 2021 at 5 p.m. The Department will review and provide feedback to each Ready Start Network.

### Eligible Centers

The B-3 Seats Pilot aims to ensure high quality care for children who did not previously attend child care *or* to continue care for children who participated in this pilot last year. Ready Start Networks must determine which centers in their network will be partners in this pilot and receive allocated seats.

#### In order to participate in the pilot, centers must:

- Have a 2020-2021 Performance Rating of Proficient or above
  - If a network is interested in partnering with a new Type III site that is not yet rated, please let the Department know
- Have infant spots available or plan to have infant spots available beginning in fall 2021 (may use B-3 funds to create infant spots)
- Ensure seats are full time (six hours of continuous care minimum)
- Meet the ECAC requirement for teachers
  - Teachers in classrooms where B-3 seats are placed should have their ECAC or be enrolled in an ECAC program by fall 2021

Participating Ready Start Networks may also choose to expand these site-level eligibility criteria to include other metrics or indicators of quality, equity, network participation, or workforce supports. For example, Ready Start Networks may consider weighing the following criteria in their decisions:

- Participation in local collaborative meetings
- An local competitive application process
- Participation in other grants or early childhood initiatives
- The extent to which the partnership expands access or creates new child care supply in the community the center is located
- Existing waitlists or evidence of high demand
- Teacher pay and benefits requirements

Participating Ready Start Networks will set up partnership agreements, sometimes called MOUs or assurances, with their participating centers. These agreements outline the requirements the Ready Start Network establishes for the center to maintain participation in the pilot. Centers must agree to and sign these partnership agreements to participate in the pilot, and Ready Start Networks should maintain these agreements for auditing purposes. In addition to the guidance provided by the LDOE on these partnership agreements, Ready Start Networks should consider reviewing these agreements with their organizations' legal council.

### **Eligibility Determination: Families and Children**

Ready Start Networks that are awarded B-3 Seat funding will be required to determine eligibility for families in order to place children in these seats. Eligibility for a child lasts one calendar year from the time of the application. Families will need to be processed for eligibility again, also known as redetermination, in the subsequent year(s) for the continuation of the pilot. All families who received a seat in year one will need to go through the redetermination process. Mid-year, the LDOE Monitoring team will conduct an audit of all eligibility documentation to ensure compliance with guidance. Documentation should be kept and be prepared to share with LDOE as requested.

All Ready Start Networks must collect eligibility documentation from families filling B-3 Seats including:

- Child documentation (e.g., birth certificate, social security card)
- Income eligibility
- Work, School/Training, or Actively Seeking Work Requirements
- If categorically eligible, necessary documentation for verifying foster care or experiencing homelessness

**Household Composition:** The members of the household include: the head of household, legal or non-legal spouse, children below the age of 18, and, if applicable, a minor unmarried parent. If a parent is a minor unmarried parent, or “MUP”, the parent of the MUP is the head of household. A MUP aged 16-18 years old must additionally meet the school or training requirements, but still is not the head of household and must have his or her legal guardian apply on behalf of the child needing care. The only exception to the MUP not being the head of household is if he or she is legally emancipated, and in that case would need to provide documentation from the court to verify the emancipation.

**Income eligibility:** Families at or below 200% of the Federal Poverty Level (200% FPL) are eligible for these seats. Income is calculated by combining all earned income (employment) and unearned income (ex: unemployment statements, alimony, child support) for a total monthly amount.

**Unearned Income:** Families may receive a combination of benefits, i.e. financial, that contribute to their monthly income. Typical examples of these include, but are not limited to, unemployment, disability benefits, child support, alimony, social security income, and retirement benefits. Benefits like SNAP can be verified in Directmatch, however, many of these are self-reported by the family. Ready Start Networks reviewing eligibility should ask for any and all unearned income from the family with documentation to verify their benefits. Ready Start Networks should then add any unearned income to the total monthly income. Some families may not have any unearned income.

To qualify, the combined income (including earned and unearned) must be at or below the income amounts listed below:

<b>Federal Income Limits: 200% FPL</b> <i>(Effective January 2021 for 2021-2022 Enrollment)</i>	
Family Size	Gross Monthly Income
2	\$2,903
3	\$3,660
4	\$4,417
5	\$5,173
6	\$5,930
7	\$6,687
8	\$7,443

**Work, School/Training, or Actively Seeking Work Requirements:** To be eligible for these seats, members\* in the household must work and/or attend a school/training program for a minimum of 20 hours per week (this can be a combination of work hours + training/education hours) OR is actively seeking work\*\*.

- **Work:** To verify this, the adults of the household should provide at least two sequential pay statements dated within two months of the application date that show the rate of pay, the hours worked, and the dates of the pay period.
- **School/Training:** If in school or a training program, the adults of the household who are students or in training in the household should provide a transcript with hours of participation in training or education program(s) dated within two months of application. A detailed school schedule (if applicable) from an accredited college or training program deeming full-time status, or a letter from a school advisor signed on the institution's letterhead could also verify student status. The typical minimum full-time status is 12 credit hours.\*
- **Actively Seeking Employment:** If adult(s) in the household are unemployed, they may still qualify by demonstrating they are actively seeking work. To qualify as “actively seeking work,” families must provide validated documentation that demonstrates they are actively seeking employment. Every unemployed adult in the household must submit validation of their Active HIRE Account information from the Louisiana Workforce Commission. *A person applying as Actively Seeking Employment cannot also already be employed.*
  - “Actively Seeking Employment” eligibility requirement aligns with CCAP, with one exception for the 2021-2022 pilot year. CCAP recipients qualifying as Actively Seeking Employment must be redetermined after 90 days from the date of their application and meet employment or training/schooling eligibility criteria. However, **2021-2022 B-3 recipients do not need to be redetermined until one year after the application date.**

\*Head of household, legal or non-legal spouse, or minor unmarried parent between the ages of 16 and 18 years of age must meet the eligibility requirements of employment, school/training, or actively seeking work. This establishes a need

for care. This definition aligns with [Bulletin 139](#), Section §103. Definitions of *Household* and *Training or Employment Mandatory Participant (TEMPs)*, and Section §507. *Certification Requirements for Categorically Eligible Households*.

\*\*Unless disabled as established by receipt of Social Security Administration disability benefits, supplemental security income, Veterans' Administration disability benefits for a disability of at least 70 percent, or unless disabled and unable to care for his or her child(ren), as verified by a doctor's statement or by worker determination, the head of household must meet the training or employment activity requirements listed above, in alignment with [Bulletin 139](#) §507. *Certification Requirements for Categorically Eligible Households*.

**Children experiencing Homelessness or Children in Foster Care:** Children and families experiencing homelessness or foster care are categorically eligible for B-3 Seats. Families experiencing homelessness should be verified by your local McKinney-Vento Liaison, while children in foster care should be verified by their DCFS caseworker. These families should also complete a "Statement of No Income." ***These children should be enrolled immediately or, if seats are unavailable, moved to the top of the B-3 Seats waitlist.***

**Aged birth to three years old:** The birth date cut off for each year is September 30. Children's ages are determined by the following brackets:

BIRTH DATE RANGE (2021-2022 Year)		AGE GROUP
10/1/2020	Present	Infant
10/1/2019	9/30/2020	1-Year-Old
10/1/2018	9/30/2019	2-Year-Old
10/1/2017	9/30/2018	3-Year-Old
Older		Ineligible

Documents to Verify Eligibility		
<b>Required for all applications (except categorically eligible families)</b>	<b>Child and Family Documentation</b>	Immunization records or Immunization Exemption (child only)  Identification and proof of residency (e.g., state-issued ID, such as Driver's License or social security card) (head of household applying on behalf of child)  Birth certificates or hospital records (child only)  Custodial documentation (only if not biological parent of child) such as Custody Judgments, Child Placement Agreement from DCFS, Provisional Custody by Mandate, Military Power of Attorney, Non-Legal Custodian Affidavit.
<b>Head of household, legal or non-legal spouse of head of household,</b>	<b>Work Eligibility</b>	Minimum of two sequential pay statements dated within two months of the application date that show the rate of pay, hours worked, and the dates of the pay period  OR

<p><b>and (if applicable) minor unmarried parent aged 16-18, needs to submit documentation that falls into one of these three categories</b></p>		<p>If newly employed, a professional letter from the employer with the work hours, the weekly schedule, the rate of pay, and the start date of employment. Contact information of the employer must be included, and then verified by Ready Start Network</p> <p>OR</p> <p>If self employed, the adult can submit the statement of irregular employment form and state hours worked per week, earned income, and start date of work. The person completing the form must provide IRS 1099 form <b>or</b> statement from employer/financial supporter to verify information.</p>
	<p><b>School/Training Eligibility</b></p>	<p>Official school or training transcript with full time or part-time status indicated (enrolled within two months of the application)</p> <p>OR</p> <p>A detailed school schedule (if applicable) from an accredited college or training program deeming full-time status</p> <p>OR</p> <p>Letter from a school advisor signed on the institution's letterhead verifying student status</p>
	<p><b>Actively Seeking Employment Eligibility</b></p>	<p>HIRE Account Registration screen shot with client name and date of registration</p> <p>OR</p> <p>Unemployment statements with client's name and date of payments for all adults in the household who are not employed or in training.</p>
<p><b>Required for all applications</b></p>	<p><b>Income eligibility</b></p>	<p>If employed, documentation for work eligibility also counts for income eligibility</p> <p>AND/OR</p> <p>Income can be verified through DirectMatch</p> <p>AND</p> <p>All unearned income documentation <b>must</b> be counted when calculating income eligibility</p>

*Families struggling to provide eligibility determination documentation may have 200% FPL confirmed by cross-referencing Directmatch. Directmatch confirmation is not sufficient documentation on its own, but can be a placeholder for families in extreme situations, such as experiencing homelessness or recovering from a natural disaster.*

### Income Calculation

How to Translate Income into a Monthly Figure	
Pay Period	Formula
Weekly Income	average income x 4.33
Biweekly Income	average income x 2.167
Twice per month income	average income x 2
Monthly Income	Use income amount
Yearly Income (salary)	Divide salary by 12 (months)

Income for families should be calculated using an average of their monthly earned income and unearned income, as applicable to each family situation. A family's income is the total average monthly income based upon the documents provided by the family.

### Redetermining Eligibility for Returning Families

All families who received a seat in year one will need to go through the redetermination process. To complete this process, the Ready Start Network should:

- Notify families of eligibility documents needed
- Notify families of deadline to return documents for redetermination (no later than one year after initial application)
- Verify eligibility once documents are received
- Confirm placement or retention of seat
- For 3-year-olds served in year 1, support families in transitioning to LA 4 or another pre-K program.

**All families, including those who participated in the first year of the pilot, must meet the described eligibility criteria.** Eligibility for a child lasts one calendar year from the time of the application.

Suggested Family Application Timeline			
Initial Meeting*	Family Submits Application	Ready Start Network verifies Eligibility	Child(ren) Enrolls
<i>Before enrollment, discuss eligibility documentation needed for receiving a seat, provide deadlines to families and guidance for returning eligible documents.</i>	<i>All dates on eligibility documentation should be dated within two months of application date.</i>	<i>Suggested turn-around in determination is no more than 10 days after application. If children are experiencing homelessness or foster care, children should be enrolled immediately.</i>	<i>Family is notified of any outstanding documentation and given a timeline on when to return with documents to enroll in child care.</i>

\*Estimate the turnaround time for your office to process eligibility and accept or reject an application. Plan to start recruitment of *new to B-3* families accordingly so that children can be enrolled as early as August 2. If a Ready Start Network is interested in enrolling children prior to August 2, they should ensure their eGMS budget is submitted and approved by LDOE and communicate enrollment dates with [devon.camarota@la.gov](mailto:devon.camarota@la.gov).

**Rates for Seats**

<b>Age Group</b>	<b>Zone 1 (Urban)</b> <i>MRS 75% (Urban) + SRTC</i>	<b>Zone 2 (Rural)</b> <i>New CCAP rates +SRTC</i>
<b>3 Year Olds</b>	\$10,670	\$10,670
<b>Toddlers (1 or 2 year olds)</b>	\$11,198	\$10,947
<b>Infants</b>	\$12,162	\$12,162

Based on the results of the 2020 Market Rate Survey, these rates are calculated at the 75th percentile rates charged in urban/suburban vs. rural parishes plus a supplement to account for CCAP bonus payments and SRTC.

Ready Start Networks may use these rates as a guide and not a rule for reimbursing their centers; however, at minimum, families must receive care tuition free. Ready Start Networks will outline the amount they will pay centers per age group within their Planning Document and final budgets.

<b>Zone 1</b>	<b>Zone 2</b>
Caddo	Iberville
Calcasieu	Lincoln
East Baton Rouge	Madison
Jefferson	Natchitoches
Lafayette	Rapides
Morehouse	Richland
Orleans	Sabine
St. Charles	St. Mary
Tangipahoa	St. Landry
West Baton Rouge	Webster
	Washington
	Vermilion

**Enrollment and Attendance Tracking**

An additional requirement of this pilot is for Ready Start Networks and centers to track daily attendance and submit to the Department monthly. Signed attendance trackers will be due on the 10th day of the following month (in alignment with LA 4 attendance tracking), and must account for each day of the child’s enrollment. Tracking will only capture

“present” or “absent” and not take into account excused absences. Ready Start Networks should maintain consistent communication with their centers and establish an internal protocol on how and when centers should submit attendance to the Ready Start Network, so they may enter the attendance into the Department Reviewed tracker. The tracker will be shared as a Google Sheet in July 2021. In the case of a child not regularly attending, Ready Start Networks and center directors should make ample attempts to contact the family to ensure the child’s presence in care. If a child is enrolled but has not attended for 30 days, the Ready Start Network should notify the family of loss of the publicly funded seat, and the Ready Start Network should enroll a new child in the seat. A network may impose a more rigorous minimum attendance requirement, and should notify the LDOE of that requirement in their planning document.

More information on attendance and enrollment requirements for reimbursements will be shared with participating Ready Start Networks in the coming weeks.

### Additional Recommendations

One of the greatest benefits of B-3 Seats being a pilot program is the learning and innovation each participant brings to the greater cohort. Throughout the first year of the pilot, the Department studied practices and procedures used across the participating networks to see areas where individual Ready Start Networks found success. The following recommendations come from those conversations, surveys, and data reflections.

1. **Pay Schedules:** The Department recommends paying centers at the beginning of the month based on enrollment. At the beginning of the pilot year, the Department also recommends paying participating centers a percentage of their allocation for “start up” funds, to buffer any gaps in pay or in enrollment. Modeling Pay schedules are forthcoming and will be linked here at a later date.
2. **Partnership Agreements - Flexibility:** The Department recommends establishing partnership agreements that provide centers with an approximate, rather than “set in stone,” seat allocation number and age. Family needs are unpredictable: they may have multiple siblings in need of care, or prefer a center closer to home rather than work. Flexibility early on allows Ready Start Networks to make adjustments to meet the needs of the community.
3. **Partnership Agreements - Removal of Seats:** The Department recommends including a clause in each partnership agreement describing cause for removal of seats. In the rare occasion that seats need to be permanently relocated to another center, it is important to have clear language to establish that protocol if needed.
  - a. example: *The Ready Start Network has the right to remove children and funding from \_\_\_\_\_ (center) at any point during the year if the Ready Start Network finds that \_\_\_\_\_(center) is out of compliance with any of the listed agreement requirements, or in violation of any requirements listed within [Bulletin 137](#).*
4. **Budgeting for Staff Capacity:** The Department recommends allocating funds for either a new hire, or expanding existing staff to include administrative duties for B-3 seats management. Having a team member on staff specifically for B-3 Seats will help build internal systems that will work toward expanding quality and access. Additionally, networks might consider budgeting for a staff member to carry multiple roles, such as B-3 Seats eligibility determination and coaching for B-3 Seats teachers.