

CIRCULAR

Date: August 14, 2013

CIRCULAR NUMBER: EIA #2013-40

Alternate Program(s):

To: Community Social Service Supervisors/Program Managers

Subject: **Payment of Unlicensed Child Care**

Reference: Circular 2012-52R2 – Processing Child Care Receipts
Circular 2004-18 – 24 Hour Child Care
Section 6.11.11 Child Care, Section 21.3.2 Services Provided by Relatives
Section 22.4.7 Family Support Program
Section 7.1 of the EIA Regulation

Type: Policy **Replaces:** N/A
 Procedure
 Rate
 Information Only
 Internal Only

Effective Date: Immediately

This circular describes changes to regulation, policies and procedures regarding payment for unlicensed child care as part of an approved employment or training plan.

Regulatory Change: The Employment and Income Assistance (EIA) Regulation has recently changed to allow payment to EIA participants for child care *when the provider is a relative*, except when the provider is a parent or guardian (or spouse of a parent or guardian) of the child or a sibling who is under the age of 18.

Requirement to Apply for Licensed Care: Prior to approving payment of unlicensed child care to a relative/third party, participants must demonstrate that they have submitted an application for subsidized child care and have put their name on the Child Care Registry. EIA participants will receive confirmation by email or mail from Manitoba Early Learning and Child Care (MELCC) when they register for child care. The MELCC on-line application site is located at:
<https://direct.gov.mb.ca/cdchtml/html/internet/en/index.html>.

The requirement to apply for licensed child care can be waived by EIA if there are no suitable licensed child care arrangements that will meet the parents' needs (e.g., no licensed child care available in a rural community or the requirement is for care during non-standard hours).

Child Abuse Registry Checks: In order to be eligible for reimbursement for unlicensed care, participants must also provide confirmation that their child care provider has a satisfactory Child Abuse Registry check. Participants must ask that their proposed unlicensed child care provider, including all persons over 11 years of age in the provider's home, complete a Child Abuse Registry Self-Check Application: www.gov.mb.ca/fs/childfam/pubs/child_abuse_registry_application_fillable_2012.pdf.

If the child care provider have a Self-Check that is less than a year old, a new Self-Check is not required.

Each Self-Check application must be accompanied by a \$15 fee. The initial payment of this fee is the responsibility of the proposed child care provider. The Self-Check review process takes approximately 10 working days for applications submitted in-person (at Provincial Services, 101-114 Garry Street) with additional processing time required for mailed-in Self-Checks.

The completed Self-Check is returned to the proposed child care provider (or other household adults) with a stamp indicating that the individual is "On Registry" or "Not On Registry". EIA participants must produce this document for all persons in the providers' home over the age of 11 in order for EIA to approve or deny the unlicensed child care arrangement. For those identified as "Not on Registry", staff can begin paying for the unlicensed care arrangement (as per child care payment policies in EIA Circular 2012-52R2). EIA staff are not to approve the unlicensed child care arrangement where any person living in the home is found to be "On Registry".

EIA staff are to instruct participants to obtain a copy of the Self-Check receipt(s) from the child care provider and submit for reimbursement to the participant. A corresponding SAMIN case note identifying the names of all persons reimbursed for completed Self-Checks must also be entered. The EIA participants will be responsible for returning these reimbursements to the unlicensed care provider/other household adult. No duplicate payment will be provided by EIA should participants not return this amount.

An EIA participant may elect to begin using an unlicensed child care to support an approved training or employment plan (before applying for licensed child care or securing the necessary child abuse registry checks. EIA can reimburse the participant retroactively for these costs upon confirmation that the participant has applied for licensed child care and the submission of satisfactory child abuse registry checks.

Registry Checks will not be required in unlicensed child care arrangements approved prior to this policy change. However, should participants arrange unlicensed child care with another provider, Child Abuse Registry Self-Check requirements must be satisfied before approving any child care reimbursements.

Child Care Providers Receiving EIA: There may be instances where EIA parents engage another EIA participant (relative or non-relative) to provide child care, which can be approved provided that the arrangement does not negatively impact the action plan activities of the participant providing child care. The child care provider will be required to report the child care income to EIA as earned self-employment income (subject to EIA work incentive calculations).

Training Plans: Participants who are involved in initial, exploratory discussions with EIA education/training partnerships (e.g., attending orientations, interviews, etc) are responsible for arranging their own temporary, child care until such time that they have entered an approved employment plan with the department. Staff may suggest that participants may cover any of these child care costs using their monthly Universal Child Care Benefit (UCCB) or other exempted sources of income.

When participants become involved in approved programming available through Employment Manitoba (EM) and transition from EIA to an EM living allowance, ongoing child care costs for both licensed and unlicensed child care arrangements are incorporated into the monthly living allowance provided by EM (up to the maximum daily rate provided by EIA).

In the early stages of EM involvement, some participants may participate in short-term/daily programming (e.g. with Essential Skills Manitoba) to help prepare them for longer-term EM education/training options. Participants can be encouraged to consult their EM Career Development Consultant on child care supports that may be available to support participation in short-term EM programming.

If EIA participants are in approved employment-related planning with other departmental education/training partners, they may receive funds from EIA for unlicensed child care.

Child Care for Short-Term Health Needs: This circular does not replace procedures outlined in *Directive 2004-18 – 24 Hour Child Care*, regarding the requirements for approving 24 hour child care supports for parents experiencing short-term health issues through the Family Support Program (see Section 22.4.7). However, paying family members may now be considered as an alternative to help meet these child care needs where sufficient time is available to secure the necessary child abuse registry checks.

All other existing policies and procedures concerning reimbursement of child care expenses as outlined in *EIA Circular 2012-52R2–Processing Child Care Receipts* continue to apply.

Sections 6.11.11, 21.2.1, 21.3.2 of the EIA Administrative Manual have been revised to reflect the regulatory and policy changes outlined in this circular.