



Child Care Assistance Program (CCAP) Investigations

Kulani Moti, Inspector General

CCAP Investigations:

- Exists to ensure that the \$283 million in annual program funds are used to the benefit of eligible children & families
- Strives to strengthen program integrity by ensuring the approximately 4,500 child care providers who receive CCAP payments meet compliance requirements by:

Identifying errors related to payments issued by CCAP

Investigating alleged or suspected financial misconduct by providers

- Utilizes standardized processes & data to drive decision making
- Takes administrative actions and/or imposes sanctions in response to violations
- Refers suspected criminal misconduct to the Minnesota Bureau of Criminal Apprehension for further investigation for potential criminal prosecution

CCAP Investigations – 2023 Updates

Multi-Disciplinary Investigation Team

- 1 manager, 2 supervisors, 10 investigators & 1 investigative assistant
- Experience – administrative investigation, banking financial fraud prevention and/or investigation, law enforcement, financial intelligence, financial auditing, investigation coordination, surveillance operations
- Education/Training - law enforcement, criminal justice, communications, strategic leadership & sociology

On-Going Collaboration

- OIG Licensing Division
- DHS Children and Family Services Administration – Child Care Services Division

CCAP Investigations – 2023 Updates

Early & Often Philosophy:

***Earlier contact with
new providers will
result in fewer errors
in the future***

Early & Often Implementation

- Established as a result of 2019 bipartisan legislation
- Implementation delayed due to Covid-19 Peacetime Emergency
- Provides Licensing & CCAP Investigations (Early & Often Investigator) support to new child care providers in the 1st year after opening, including:
 - Education & technical assistance to new centers on provider compliance
 - Licensing visits quarterly
 - Joint Licensing and Early & Often Investigator visit in 3rd quarter
 - Early & Often Investigator conducts a 3rd quarter attendance record review

CCAP Investigations – 2023 Updates

Enhanced Provider Communication & Engagement

- Provide & review written information during site visits that detail:
 - Who is requesting records, including name & contact information
 - Why records are being requested
 - What specific records are being sought
 - What record-keeping requirements will be reviewed
 - Potential consequences if requested records:
 - Are not available when requested
 - Do not comply with record-keeping requirements
 - Where to find more information about CCAP attendance record-keeping requirements
- Written receipt of records signed by provider & person collecting record
- Notify & recognize providers when attendance record review identifies no compliance violations

DEPARTMENT OF HUMAN SERVICES

Request to Produce Attendance Records for the Purpose of Child Care Assistance Program (CCAP) Compliance Monitoring
CHILD CARE PROVIDER COPY

TO BE COMPLETED BY CCAP INVESTIGATIONS PRIOR TO SITE VISIT

DATE OF RECORDS REQUEST: _____

CHILD CARE PROGRAM NAME: _____

NAME, TITLE & CONTACT INFORMATION OF ASSIGNED CCAP INVESTIGATOR: _____

CHILD CARE ASSISTANCE PROGRAM ID #: _____

LICENSE/CERTIFICATION #: _____

1. Who is requesting the attendance records? CCAP Investigations is a unit within the Minnesota Department of Human Services (DHS) Office of Inspector General (OIG) Financial Fraud and Abuse Investigations Division (FFAID). The records are being requested by CCAP Investigations, and the person making the request may be either an OIG CCAP Investigator or an OIG Licensor, who is collecting records on behalf of CCAP Investigations.

INFORMATION ABOUT THE OIG EMPLOYEE MAKING THE ONSITE RECORDS REQUEST

NAME: _____

TITLE: _____

OIG DIVISION:
 FFAID CCAP INVESTIGATIONS
 LICENSING

2. Why are attendance records being requested? This record request is for the purpose of determining compliance with CCAP record keeping requirements. DHS is authorized to review and obtain these records under the authority of Minn. Stat. secs. 119B.125, subd. 7(b), 245A.167, and 245E.02.

3. What attendance records are being requested? You are being asked to produce attendance records of all children receiving services through the Child Care Assistance Program (CCAP) for each day in the following date range:

ATTENDANCE RECORDS START DATE: _____

ATTENDANCE RECORDS END DATE: _____

4. What is the difference between attendance records and classroom records? Some child care providers keep classroom records to track classroom attendance, staff to child ratios, and other licensing requirements. Classroom records often do not meet the CCAP attendance record requirements. Providers are solely responsible for ensuring that the attendance records they provide in response to this request are the records used to comply with CCAP record-keeping requirements.

5. What CCAP record-keeping requirements will be reviewed? As a condition of payment, all providers receiving child care assistance payments must keep: 1) accurate, 2) legible, 3) daily attendance records, 4) at the site where services are delivered for children receiving child care assistance (Minn. Statutes 119B.125, subd 6). These attendance records must include:

- The date (month/day/year), and
- The first and last name of each child in attendance, and
- The times when each child is dropped off and picked up, and (list continued on next page)

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6. What happens if a provider does not comply with CCAP attendance record keeping requirements? If a provider has not complied with CCAP attendance record keeping requirements (including not cooperating with this request for records), DHS may issue the provider a sanction, including a corrective action, overpayment, registration closure, stop payment, or an administrative disqualification, and/or refer the provider to another investigative agency.

7. Where can I find more information about CCAP attendance record keeping requirements? Detailed information about CCAP requirements can be found in the Minnesota Child Care Assistance Program (CCAP) Child Care Provider Guide (DHS-5260) that was provided to you at the time of your registration and may also be found on the Minnesota Department of Human Services' website. DHS also created two optional versions of an attendance record forms (form DHS-6548B for daily attendance records and form DHS-6548A for monthly attendance records) that can be found by searching on "CCAP Attendance Records" on <https://mn.gov/dhs/general-public/publications-forms-resources/edocs/>.

8. What happens next? The attendance records you provide will be reviewed by a CCAP investigator to determine compliance with CCAP requirements. This review may take a few months. Once the review is complete you will receive a written notice of the outcome of the review.

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9. Note: The law does not allow you to... the child was dropped off and... ping off or picking up the child. ... fine your compliance with CCAP... p attendance records must be... service. (Minn. Stat. 119B.125, ... any records not provided at the... allowed by law, including the... The law does not allow you to... on. (Minn. Stat. 119B.125, subd...

CCAP Investigations – 2023 Updates

Enhanced Quality Assurance

- Established new unit in Division in December 2021
- Building on the success of the CCAP Investigations Continuous Improvement Project
 - Ensures division-wide investigations are consistent, timely & decisions are data driven
 - Develops & oversees process for routine review of metrics & measures to determine quality/quantity outputs
 - Identifies corrective action & training needs

CCAP Investigations – 2023 Updates

COVID-19 PUBLIC HEALTH
SUPPORT FUNDS FOR
MN CHILD CARE PROVIDERS!

 MINNESOTA
COVID-19 RESPONSE



COVID-19 Child Care Grant Compliance

- Forming & staffing new unit
- Investigating and/or auditing provider compliance with multiple Covid-19 related child care grants, including:
 - Peace Time Emergency Child Care Grants
 - Covid-19 Public Health Funds for Child Care
 - Child Care Stabilization grants
- Each grant has specific eligibility requirements
- Conducts proactive auditing for compliance & reactive investigation in response to a tip, referral, or other identified compliance concern

CCAP Investigations – 2023 Updates

Enhanced Surveillance Capability

- Procured integrated video management & content analysis tools
 - Move away minute-by-minute video review & manual tracking
 - Able to pinpoint people & objects of interest with speed and precision
 - A forensic product that preserves evidence
- For investigations involving alleged or suspected financial misconduct by providers
- Improves the efficiency, effectiveness & organization of post-event investigation productivity

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Thank You!