

**CACFP Sponsor
Implementation of New Block Claim
Requirements
First Trimester Survey**

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The National CACFP Forum *CACFP Sponsor: Implementation of New Block Claim Requirements First Trimester Survey* collected information on the progress, impact, and outcomes of the first phase of the implementation of the new Block Claim regulations. The survey was distributed in two stages to maximize input from respondents operating on different implementation timelines and to assure broad dissemination. Survey data was collected from February 2006 to March 15, 2006.

A total of 209 surveys were submitted by sponsoring organizations (one survey per sponsoring organization). The sponsors responding to the survey serve a total of 70,183 family child care homes, which is nearly half (47%) of the family child homes currently participating in CACFP.

We wish to thank the sponsors for the effort and time taken to give carefully considered, insightful, and detailed answers regarding the implementation of the Block Claim regulations.

We are grateful to the Sponsors Association board of directors for their excellent contribution to the design of the survey. Their comments and advice were invaluable.

This summary highlights some of the survey results. A full report will be forthcoming. Summary written by Geri Henchy, Food Research and Action Center, ghenchy@frac.org.

March 2006

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Comments

1: Based on our experience as working mothers and or child care providers, we are fully aware that some children – many children – are in daycare daily and do not miss due to illness, etc. The block claim procedure only adds additional work and additional cost to our food program. It has not helped, in any way, to find providers who are submitting false claims. We already were very good at doing that already. We spend too much time now verifying good, honest providers. These providers do not care if we make household contacts because they have nothing to hide. However, we would like to have more time to spend on challenging providers.

6: I feel that this requirement does not aid in detecting false information. It is an unrealistic period of time and parents work because they need the money. Many of our employers in our area make it hard for parents to take time off of work. Also, because of this our local doctor's office has evening and Saturday morning appointments. This new requirement is making providers dishonest and not claiming a child so that it does not come up as a block claim.

7: The block claim regulations were well-intended, but don't really target the people who are being fraudulent. Usually it is simply targeting the people with small enrollment and the lower-income families who can't take time off when children are sick.

8: Incredible amount of work for nothing. Providers are quitting or manipulating their claims to not block claims. Also relatives will say anything to cover for their relatives. House hold contacts are a joke.

9: False claims would be identified using the five day reconciliation procedure (with unannounced visits) – no need for block claim edit.

11: Takes a lot of time, but is how we caught two providers fraudulently claiming. Identifying a block claim is painstakingly difficult with the 15 day definition. A calendar month makes more sense. Most kids in daycare full time go every day. You would expect to see fluctuations over time, so continued block claims are more of a red flag than one. Letting us do the Block Claim unannounced visits within a quarter would allow us to use our time more efficiently.

12: These regulations do very little to detect fraud and go a long way towards eroding our relationship with our providers. They see us more and more as the enemy rather than as a source of support and information. For many "good" providers this will be just one more reason why they choose not to participate in the CCFP. Fewer providers on the CCFP

will only mean a decrease in the health and nutrition of the millions of children being cared for by family child care providers.

13: I think block claiming reviews might keep those providers who might be fraudulent think twice before claiming meals/snacks that they didn't serve. Ninety days would be better. Around the holidays in December a lot of kids are not present.

15: I wish USDA would focus on the importance of nutrition education in this program rather than beating the program to death with integrity regulations that aren't necessary. The obesity issue as you know is a growing health threat and affecting our children and nation's overall health. It is hitting our day cares where preventative efforts need to be made. Recently it was reported to be about one of our day care homes whereby our monitor observed that a five year old refused to eat his lunch that day. He had been teased at kindergarten about being "fat" and therefore wasn't going to eat his meal. We need to work together on how we can help address the growing problem of overweight and obesity in all child nutrition programs. It seems the CACFP is excluded from this effort and the resources are being spent on claim processing and trying to detect fraudulent claiming.

I especially find it very frustrating in my job as Executive Director as I have a dual role, administrator and nutrition consultant (I'm an RD) for the program. The program funds we receive are not sufficient that I can hire a nutrition consultant to provide training and help in the development of nutrition education materials. I'm increasingly frustrated because more of my time has to be spent on integrity regulations that are time consuming and a lot of unnecessary busy work. So what is getting lost is time for the nutrition education and nutrition issues. Our day care providers are frequently commenting on eating problems with children and the poor parenting eating habits. I think it would be so valuable to determine how the CACFP can more adequately assess and determine how some of these issues can be addressed.

I wish USDA would focus on the importance of nutrition education in this program rather than beating the program to death with integrity regulations that aren't necessary. The obesity issue as you know is a growing health threat and affecting our children and nation's overall health.

17: [Household contacts]The policy developed by the sponsors and state agency in [my state]* was developed prior to the implementation of the rule. Without any perspective on how this would impact participants and the sponsors of the CACFP we developed a particularly cumbersome and labor intensive system. We have revised our and submitted the changes to our Regional office. Hopefully, the changes will be accepted and approved. We are spending a tremendous amount of staff time in doing the household contacts within the timeframes we established. I think we have to review other ways to implement this integrity check without overburdening the sponsors and intimidating the participants/providers.

18: We have cut out our group nutrition training and one in-home nutrition training in order to make up the time spent on block claim and extra parent verifications. Have providers with legitimate Block Claims altered their claims to avoid “being in trouble” for submitting a Block Claim (i.e. dropped a meal they actually served from the claim)? Not that we have noticed. Most with block claims are legitimate (different children claimed). Our providers cannot afford to have empty slots and stay in business if child care is their main form of income. They will take drop in children to fill the empty slots whenever possible. And those with only one child or one family have the children regardless – especially our grandparents. The feedback we have received from providers on this regulation has to do with the nature of the community. Most parents are low income (for us about 92% of the children we serve are low income). Their parents work in service industry and taking any time off, if they have time off, for a sick child is just not an option for most of these parents. A 15 day block is not really long enough time. This would mean a parent has at least one day off each month. In our experience, days off are rare. In addition to full time provider filling all their slots to stay in business, the smaller providers (usually DHS), are grandparents keeping grand children. These children are in care so the parent can work. Grandparents have no problem taking the child to the doctor or keeping them when ill. If the regulation could extend the time, or exempt these providers it would save us visits that I know are legitimate. It would take much less time if we could simply do parental contacts in such cases rather than additional visits.

19: [My State]* is just clarifying the regulations for sponsors to follow. The Roundtable meeting in January helped give us more steps to follow, such as house hold contacts, checking in/out records, and other ways of validating the enrollment. (Check Subsidized family’s forms). Almost 85% of our block claims are providers that care for 3 families or less and have 2-3 children.

20: I have found nothing positive about the Block Claiming. It is hard to identify blocks claims because of shift changes, children coming and going. I have found that my paperwork time has most definitely increased because I now do extra paperwork to figure out if that claim is a block claim. Some block claims you can tell right away but most you need to actually count each day, and each meal/snack to make sure whether the claim is a block claim that will require a home visit. Parents and providers feel this is very unfair. Providers are open for business; of course they are going to take care of children for more than 15 consecutive days. Most people work from Monday-Friday with the same hours, so why is the provider being penalized for doing her/his job? Essex County is a very rural area. Many employers do not offer benefits such as sick leave or personal time so if parents don’t go to work than the parent doesn’t get paid, therefore the children must go somewhere and that place is at child care homes.

22: Block claiming is just one more burden on the sponsor that is not making a difference in the integrity of the CACFP for our particular agency. We already had procedures in place for validating claims and household contacts that worked well for us. Our state agency is training sponsors the end of February on Block Claiming. Now one seems to have a clear picture of exactly what is expected from sponsoring agencies and this

regulation was effective October 1, 2005. There has to be a better way of validating claims instead of demeaning providers who are caring for children. What's next? Is the USDA going to give sponsors a law enforcement badge to wear on home visits?

23: We are a Military Sponsor therefore the block claiming doesn't really apply to us. All of our daycare children's parents are either active duty military or DOD employees and are required to be on duty daily. Most children are dropped off between 6-7 a.m. and picked up between 5-6 p.m. and are in care for all meals.

24: We were already doing unannounced visits as a result of block claims and had been for three years so very little changed for our CACFP. Block claims should trigger unannounced visits. Household contacts do not work as a general rule.

27: Waste of time and resources.

29: I feel Block Claiming has made no difference in the program this has just increased sponsors work.

32: We began implementing the block claim policy in August and many more claims were identified at that time. October had fewer claims since we were not assessing block claims for the previously identified providers who were having their block claim visits. We identified few block claims in November and December because the holidays limited the number of claiming days for most of our providers.

33: The reason for Block Claiming is not easy to validate. Providers can't understand why a monitor would ask "why is that child always in your care." Their reactions are "the parent always brings them." It seems more important to always see the children that they count on their menus. That brings about more direct results, because if a child is absent, the monitor can go back within 30 days to verify that the child attends that day care.

34: This has been a lot more time and expense to try and find problems: this is so focused on just one area. I feel that because we are a small program and have already an intense edit check on the claim when it arrives in the office, that we have been able to detect problems with the claims at that point. This new regulation has required us to eliminate other activities for nutrition education for the providers. In the past we have had a monthly newsletter and a quarterly nutrition education packet that was given to providers at the monitor visits. We have had to change the newsletter to bi-monthly and discontinue the units due to the time restraints.

37: I believe that any false claims or suspicious activity can be detected during unannounced reviews. I understand that the new regulations are designed to reduce fraud, and that is a commendable goal. However, placing a monetary burden upon Sponsoring Organizations does not seem to be the best approach towards the meeting of that goal.

38: I don't care how you spin it providers see an unannounced block claim visit as a negative reflection on their child care even when it is a totally accurate claim. So I would figure the negativity and its concurrent "bad-will" feeling at least as damaging as the monetary cost.

42: We have had many providers (good, legitimate) react very negatively to the block claim validation process. The monitors try to be very sensitive and careful when validating a block claim, but many providers are insulted and upset and feel like we are accusing them of cheating. Pressing the providers for "reasons" just adds fuel to the fire in some cases. Providers, and yes, monitors have threatened to quit the program. I will admit that I was not prepared for this reaction.

43: My suggestion would be to combine the {5 day reconciliation and 15 day block claiming} and institute a monthly block claiming check with the follow-up to be conducted within 60 days regardless of the number of children in care. This isn't difficult, upholds the integrity of the program, and doesn't create a financial burden. Especially with increased fuel costs! This works for centers and family homes!

44: Improvements: exempt on-child enrolled homes and one family enrolled homes. Providers have dropped the CACFP because of feeling accused of wrongdoing.

45: Need more detailed training on Block Claiming.

46: Rather than Block Claim Report requiring unannounced home visits within 60 days for all providers who appear on this list, looking at our meal patterns during unannounced home visits (2 of 3 per year) will catch those who are claiming the same number of children for specific meals on their menus except when a monitor views a meal, at which time there are fewer children. This always triggers investigations on our part. We do parent audits on the following month and often terminations follow. Block claim procedures required in [my state] cause additional home visits in counties that are an hour or more away, often to providers we have recently visited, unnecessary time spent on clerical duties and take time away from our already very busy schedules.

49: [We are] a small organization and thus far we have seen about three or four block claims per month so it hasn't been a financial hardship on our organizations. We have found that the providers who are block claiming are those who care for one family and claim their children.

50: It has been very time consuming.

51: Eighty percent of my providers have a ratio of a maximum of six children with the majority of providers claiming their own children (which averages 2-3 children provide). Seventy percent of my providers block claim monthly based on the current definition. The block claim requirement as it is today, is very costly in time and there

52: Whatever happened to trust?

52: Not cost effective. Unnecessary threatening to good providers. Detrimental to the working relationship with providers.

53: Sponsor should have more say and state should back us up more. Block Claims do not always show cheaters. Cheaters will leave a day off and claim 14 days.

55: I educated my providers all summer via the newsletter, and the numbers do have a lot more variation now. I'm just not sure how long that will last until it becomes old hat again.

56: I'm not sure how we can monitor the Block Claims when in [my state]* most providers have four or fewer Day care children. Therefore 95-100% are Block Claiming.

57: Homes with only school age should receive exemption as children are required by law to attend school and strive for perfect attendance awards.

60: When dealing with the block claims, we have found that during the first 15 days very few children miss, but as the month goes on, a child will miss a day or two.

63: They are burdensome and unnecessary. They do nothing to improve integrity of CACFP. The extra visits required leave less time for other services. The providers are frequently insulted and feel we don't trust them.

67: As with any of the recent regulations, it has increased work and cost of running the program with no additional compensation. I feel that we have a very low percentage of block claims...most legitimate and could have been detected through other internal audits without causing the additional work/cost to the program. I also need to say that it has caused three providers to drop the program. They stated that it seems that they are continually dealing with new regulations and that they are increasing all the time, leaving them decreased time to spend with the children as they would like. It has caused some providers to have to hire help so that they can keep up with the paperwork...increasing the cost to their program and the cost of daycare to parents.

68: It would be wonderful to be able to validate a blocked claim for 12 months instead of just for the fiscal year. The current regulation "punishes" new providers and providers who do not have a blocked claim until later in the year. The provider who submits a legitimate block claim in October is "exempt" from block claim checks for a full year, but the provider whose first blocked claim is in June, is only "exempt" for a few months. This sponsor believes strongly that a blocked claim is the same children being claimed every day, not the total number of children claimed. It would make the process more meaningful as an integrity check.

74: I don't understand the purpose in the 60 day follow up to a block claim. If you have a provider who submits a block claim and you wait sixty days to do a follow up visits and parental contacts, that provider has time to submit two more block claims.

79: We no longer have enough time/resources to provide education focus on foods. After a lot of thought and consideration I have decided to withdraw from the USDA food program as of October 16, 2005. At one time it was a good thing for most providers. Now since going to Tiers and all the new regulations and paperwork, I feel it is not worth it. One can spend all the time on paperwork and notifying the USDA that you might be out (in case they drop by). I think just taking care of the children; time would be more meaningfully spent. I also think it is unfair to have the parents do the same paperwork over and over. Calling the parents once in a great while might be ok but like every 15 days of block daycare is a little to much. They also have their jobs to do, that is one of the reasons they have hired daycare providers.

81: [Our state]* is still working with USDA to identify what would be a legitimate Block Claim. Our sponsor associate has sent a list of reasons and we are waiting for reply. We are encouraging our providers to do sing in/out sheets signed by parent as back up. These new regulations have made our workloads increase, our visits less nutrition oriented and we are concerned...

83: We just can't get it all done. We were already watching block claiming patterns and conducted parent verification and unannounced visits when a pattern emerged. This method contains much more paper chasing.

84: This is not a working practice. It has no bearing on fraud prevention. It CACFP is going to survive administration must listen to coordinators that go into home. [We] have yet to send memos on block claiming.

85: We feel the 5-day reconciliation is a better tool in detecting any misrepresentations. We also have concerns about looking at only 15 days and at just the number of children. There is so much possibility for variations in children's schedules. We filled this out as a group of nutrition specialists (field monitors)

87: Up to this time we have concentrated on finding a system that works for both block claiming and reconciliations. The system is just now in place to accurately figure the information you are requesting in this survey. We will be in a better position to answer these questions more accurately next time around. What you see above is the best information we have now.

89:60 day block claim has been very expensive and confusing for all. I do like the five day reconciliation better and believe it is more effective due to it is done on every visit we do in the provider's program year.

90: Even though we are a third or so into the fiscal I believe many sponsors need added clarification. It is very different reading and hearing the regulations as opposed to the actual implementation. There are still many questions. Informal State sponsored group sessions with enough time for questions and answers.

94: Waste time looking at providers with a few children. Five providers who have top reimbursement never have block claims.

97: I understand and support the intent for the block claim; however, the regulation is too strict. Administrative funding is not enough to support our operation of CACFP. Our program has been devastated by the extra work, and if one staff person takes a much needed vacation, it throws the entire balance of our operation off for the month and some times for month to follow.

100: Since this is the first three months, we have not yet had to do additional monitoring visits. Instead individuals with flagged block claims have been moved forward in the rotation of visits. By year end, this is likely to result in additional visits.

102: We should have been allowed time to train our providers on the blocking claims regulations before it was implemented. Providers have been block claiming for years.

105: We had already been doing our own block claim tracking for over two years we call it perfect attendance.

110: I do not like the block claim – just one more thing for the program to do and no extra money given.

112: Most of us have been monitoring these same providers sometimes for years. If we don't know whose claim might be questionable and then act on it, then we haven't been doing our job. To allow someone to claim the max every day except on days of monitor review is unacceptable.

114: When a small sponsor needs monitors to process claims they lose 7-10 days to monitor block claims within the 60 days. Our state starts the 60 day clock the day the claim arrives, not the day the claim is processed and the block detected.

116: A provider can have perfect attendance of all children and never have a block claim because some children are enrolled on weekends only, or some weekdays and some weekends. These are the providers who are more apt to be abusing. As a tool block claiming is not very accurate a measure of system abuse because there are so many variables of attendance in most day care homes. A better tool to use may be a certain percentage of perfect attendance during the month. We have providers who consistently have 100% perfect attendance month after month, but would never have a block claim because the children are not all enrolled on the same days.

120: Many of our providers have their own children on the program, thereby increasing the chance of block claiming. Our local coalition has determined that reimbursement for child care shall be authorized for no more than five absences per calendar month per child except in the event of extraordinary circumstances. Parents that are on subsidized care may be trying to stay within the five excused absences, even when the children are ill, thereby increasing the chance of block claiming. In our county the maximum capacity

is five children except for ten large family child care homes with a maximum capacity of twelve. The majority of our providers care for small groups of children, therefore, increasing the chances of block claiming. In November out of 116 household contacts sent, we received eight returned letters: in December, out of 84 household contacts sent, we received 10 returned letters. Since we do not require the providers to mail/call us with any changes of parents' addresses or phone numbers, we may have obsolete or out-dated information. This is a great expenditure of returned correspondence. We would like to propose the following: That we conduct the sixty day review after two or three consecutive months of block claiming. That we conduct the sixty day reviews once we receive household contacts that indicate that the block claim was not valid. Extend the definition of a block claim from 15 days to a full month. As a final comment: The process involved in investigating block claim in family child care homes does not justify all the time/money invested in processing additional reviews and paperwork. There should be a better and more provider-friendly system to investigate potential fraud.

121: These new regulations are particularly challenging for small programs. The majority of our block claims have been for meals in which only one or two children are present and those that include a set of siblings and the providers own child. We have also noticed that many of our new providers who are just starting to provide child care only have one or two children, causing them to come up as a new block claimer in the first few months of participation. We believe that by forcing monitors to conduct early unannounced visits requiring them to ask providers why they might be claiming meals to the one child for fifteen consecutive days of business is confusing and stressful for the new provider. To truly initiate the provider into the food program and all of its regulations, the provider should be afforded her four week visit and a scheduled training visit. In general, we have had a difficult time seeing how this improves program integrity.

122: So far we haven't had any problems with block claiming. We have so few providers we are able to watch this closely.

127: Block claims are not effective cost wise, time wise, or result wise. We terminate providers each year based on our own hunches from vibes picked up during monitoring visits, several perfect claims in a row, info gained from new enrollment statements, and income eligibility forms filled out by the parents. I feel requiring a percentage of parent contacts each month would result in more accurate claims. It is more effective and less costly in terms of time and mileage. If providers know we will be contacting parents each month they will be less likely to fudge. Our good providers feel the block claim visit is intrusive and strains the feeling of trust between the provider and the monitor. The not so good providers already know or will find a way to work the system.

129: It would be impossible without hiring additional staff to complete all visits within...

131: Improvements to block claim regulations and procedures would eliminate legitimate claims from the timely administrative procedures, and allow sponsors to focus on recruitment, retention, and nutrition education.

132: We have a unique system since we see our family day care homes twice a month and avoid any type of problems with block claims.

134: Block claim regulation are not an effective means for monitoring family child care. Many parents bring children every day regardless of illness or family circumstances, especially in cases that parents are working minimum wage jobs

135: If someone wants to cheat, they will – I don't see them changing human nature. They are only burying sponsors in work!

136: Our agency is small and has not been impacted by block claiming at this time.

138: I believe that all procedures are fine. The problem is that the amount of paperwork. You need another staff just to work on the block claiming issues and the administrative dollars are not there.

144: The [my state]* requires parent signatures everyday for each child. Some providers on our program use attendance forms with parent signatures, which they submit to us each month with their claim. When we do a block claim visit, we ask to see the parent sign in/out records, which in some cases have already been sent in with the claim. We feel that we are not using our time and resources efficiently if we also have to go out to do a review. In these cases, we feel it is appropriate to verify the block claim with the information submitted.

We also doubt the accuracy of parent contacts. In this day and age, if someone calls to verify information about a family and their children, many parents are not willing to give out this type of information to anyone, even if they say they are from the CACFP Program. Parents need to be skeptical and careful about any information they give out to anyone.

145: Any additional comments you have regarding implementation of the new regulations?

Unfortunately we have had providers drop the program because of the new regulations. We have worked very hard to train our Field Services Representatives to be very sensitive to the provider's circumstances and to attempt to ask questions and check paperwork in a manner that won't insult them or make them think that we're policing them. We have had some providers participating on our program for years and have weathered the regulations storms. But these new regulations have proven to be the last straw.

Let me share a few thoughts from a provider's letter that I just received. "I have been with the same food program for 11 years. . . . I cook good homemade food. I'm proud of the food I serve and the time I spend planning the meals and still the sponsor is not happy until she hunts hard enough to find something wrong. . . . I don't need to be treated like a stupid person. I'll just do without the food program so I can be more creative."

She and I talked at length and talked about the changes in the program over the years and how hard it has been on our honest providers. They're tired of the assumption that they're all cheating. No matter how we approach this – it is insulting to be questioned in this way.

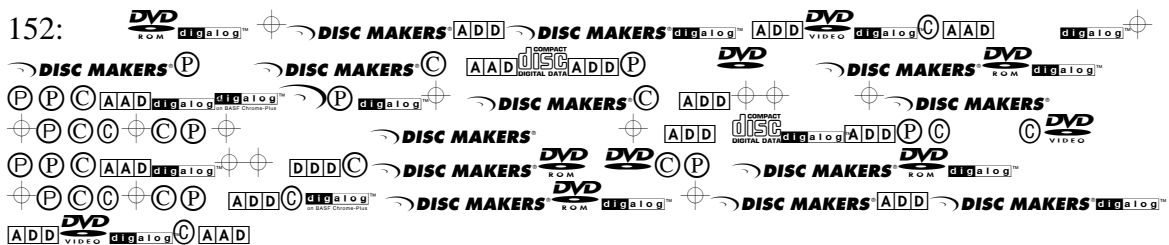
147: [My State]* is sparsely populated so the additional mileage for 1 block claim visit can mean over 400 miles (round trip), nearly \$200 at the IRS mileage rate. There needs to be additional administrative funds for these additional costs. Because of the extraordinary travel cost a state like [my state] has the administrative funds didn't cover the cost of administering the program before this new block claiming required procedure.

[My state] allows unlicensed child care providers serving child care subsidy children and meeting specific safety requirements (similar to licensing) to participate on the CACFP. These providers are only permitted to serve up to 2 children or one family of children, many only serve one child. They will always be identified as block claiming, as they only operate on the days they have the child(ren). As we can readily identify them without the need for a visit, it seems ridiculous to have to do a visit regardless. The new process is a one-size fits all approach and does not allow for common sense. There should be an opportunity to review the list of potential block claims and identify those that can be legitimized without a visit.

Another approach would be to have the provider submit their child in-out record for the month a block claim was identified and if the records don't match the claim use parent contact to verify attendance and meal participation.

There has to be a better way to approach the problems in the program.

151: 60 days is not enough time for follow-up.



156: It is very time consuming.

164: We are in rural America so most of the providers have the same children year round with very little changes in meals served or time at daycare. They take care of sick kids.

166: We are still trying to learn and understand “block claiming.” We have conducted extra visits and/or household contacts when necessary but honestly have not kept track of

“percentages.” We are not in favor of the new block claim requirement. It is also creating a negative feedback from the providers. The providers feel like we do not trust them.

173: It has been difficult to train the monitors. Useless paperwork.

178: We do parent audits on high dollar demands even if it is not a block claim.

179: It seems to be a waste of money. If sponsors have done their jobs, we can detect false claims through monitoring, enrollment checks and knowing the program.

180: The extra visits required leave less time for other services. The providers are frequently insulted and feel we don't trust them.

181: Five day reconciliation is more accurate way of discovering discrepancies.

182: So much more staff time \$! Far more policing and less nutrition education.

184: Very time consuming.

185: Very time consuming.

186: Additional man hours required to implement are not being compensated for in admin. fees. Too much time is being taken up by block claim follow-up and planning that it reduces the amount of time added nutritional education can be planned. Increased workload on monitors by 25%. Increased monitor costs (mileage, etc) by 30%. Increased paperwork costs (time and materials). Admin. Fees should be increased to offset planned major changes in procedures prior to implementation.

187: Need more administrative funds to conduct block claim – might as well change regs to 2 unannounced and 2 announced reviews-so 4 instead of required 3 visits. But we need more dollars. Not only cost of extra monitoring visit but also for administrative duties that need to be conducted to investigate and follow up on meal claim.

192: We do household contacts if needed to verify block claiming.

193: The implementation of the block claiming requirements have set me back in the completion of my normal duties to the point that I missed the deadline for your survey and in fact am having to work weekends to get caught up. However behind I am, I feel that I have some valid point to make regarding its implementation since I have been working them as much as I possibly can.

If you exempt a block claim because it only includes one child, you won't be really doing anything. It needs to be extended to exempt child groups. What I mean is that when parents take their children to daycare, they usually take them all. So if mom is dropping off one child, she is just as apt to drop off all of her children, sometimes three or four. So

we need to approach this exempt one child with a child group attitude in order for it to really do any good.

I quickly reviewed 41 of my block claims that haven't yet been filed. Of those:
15% included block claims involving two child groups
27% included block claims involving the provider's own children
44% included block claims involving only one child group.

A child group should be defined as those children residing at the same address, because with lower income areas, often families share residences and often the childcare duties. So if 2 child groups share a home, and one of the parents is picking up their own children, they usually pick up the others as well.

As you can see from the percentages above, I could have saved the time, effort and money expended to research at least half of these block claims if an automatic exemption existed, and could have used that time more wisely to provide better research into the block claims that are more questionable.

To really put these new regulations to good use, I suggest that we exempt block claims detected that include "up to 2 family child groups plus the provider's own children."

If there is concern that the exemption suggested above would overlook them too easily, perhaps it should be included that exemptions are not cleared for a year. In fact, a sponsor would have to review the child groups each time a block claim is detected to insure it is within the exemption guidelines.

We don't need to waste our time harassing a person who is TrustLine approved or just taking care of her grandchildren to help out her children. These homes are always going to submit block claims and it's a waste of time. Other verifications, such as home visits and annual update of enrollments should be sufficient to validate these meal claims.

198: Household contacts find more meal count errors.

* [my state] or [our state] has been substituted for the specific state name in order to preserve anonymity of respondents.

201: The monitoring visit requirement is too expensive to complete. We have a monitoring history that doesn't improve with one more visit.

202: Current regulations make this a not cost effective integrity initiative!

* [my state], [our state], and [my agency] have been substituted for the specific state name in order to preserve anonymity of respondents.