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**State of Wisconsin
Governor Jim Doyle**

TO: Income Maintenance Supervisors
Income Maintenance Lead Workers
Income Maintenance Staff
W-2 Agencies
Workforce Development Boards
Job Center Leads and Managers
Training Staff
Child Care Coordinators/Certifiers

FROM: Laura Saterfield, Bureau Director
Bureau of Early Childhood Education
Division of Early Care and Education

DCF/DECE OPERATIONS MEMO					
No: 10-38					
DATE: 05/07/10					
FS	<input type="checkbox"/>	MA	<input type="checkbox"/>	BC+	<input type="checkbox"/>
SC	<input type="checkbox"/>	CTS	<input type="checkbox"/>	CC	<input checked="" type="checkbox"/>
W-2	<input type="checkbox"/>	FSET	<input type="checkbox"/>	EA	<input type="checkbox"/>
CF	<input type="checkbox"/>	JAL	<input type="checkbox"/>	JC	<input type="checkbox"/>
RAP	<input type="checkbox"/>	WIA	<input type="checkbox"/>	Other	<input type="checkbox"/> *
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PRIORITY: HIGH					

SUBJECT: Wisconsin Shares Child Care Subsidy – CSAW Authorization
Adjustment Automation

CROSS REFERENCE: Child Care Statewide Administration on Web (CSAW) and Child
Care Provider Information (CCPI) Manuals

EFFECTIVE DATE: 05/16/10

PURPOSE

The purpose of this memo is to inform the county/tribal subsidy administrative agencies about upcoming changes in the CSAW and CCPI systems. Effective 5/16/10, the system will adjust enrollment-based authorizations if the slot is under-utilized.

BACKGROUND

The State Budget, 2009 Wisconsin Act 28, requires the Department of Children and Families to adjust enrollment-based authorizations that are under-utilized. The law requires the Department to track a child's usage of a slot over a 6-week period. If the total utilization during the 6-week period falls below 60% of the total authorized weekly hours, the Department must adjust the authorization so that the new authorization is at 90% of the highest attended week.

Authorizations will not be reduced if an absence is due to any of the following reasons:

- One week per year of vacation time for the child care provider
- One week per year of sick time for the child care provider
- Two weeks per year of vacation time for the child's parent

- Medical leave from work (parent) or from child care (child) – (up to 6 weeks)
- Temporary break in employment (up to 4 weeks)
- Temporary layoff (up to 4 weeks)

The Statutes required the Department to promulgate rules to specify how the requirements under this section will be implemented. The Department will file an emergency rule in May and proceed with the permanent rule-making process immediately after filing the emergency rule.

AUTOMATION

The authorization adjustment functionality will be automated effective 5/16/10. At the end of each attendance period (every other Saturday), the system will analyze 6 weeks of attendance. If the **total** utilization falls below 60% of the authorized weekly hours, the system will recalculate the authorization, send a notice to the parent and the provider and two weeks later will adjust the authorization to be 90% of the highest attended week. NOTE: The reverse never happens. The system will not automatically increase the number of hours if the child is over-utilizing a slot. If a child needs more care than what is authorized, the worker must manually adjust the authorization.

The authorizations calculated on Saturday 5/15/10 with an effective date of 5/30/10 will be the first ones affected by this change.

Example of a reduction:

John has a 50-hour enrollment-based authorization to ABC Child Care. His attendance during a 6 week period is as follows:

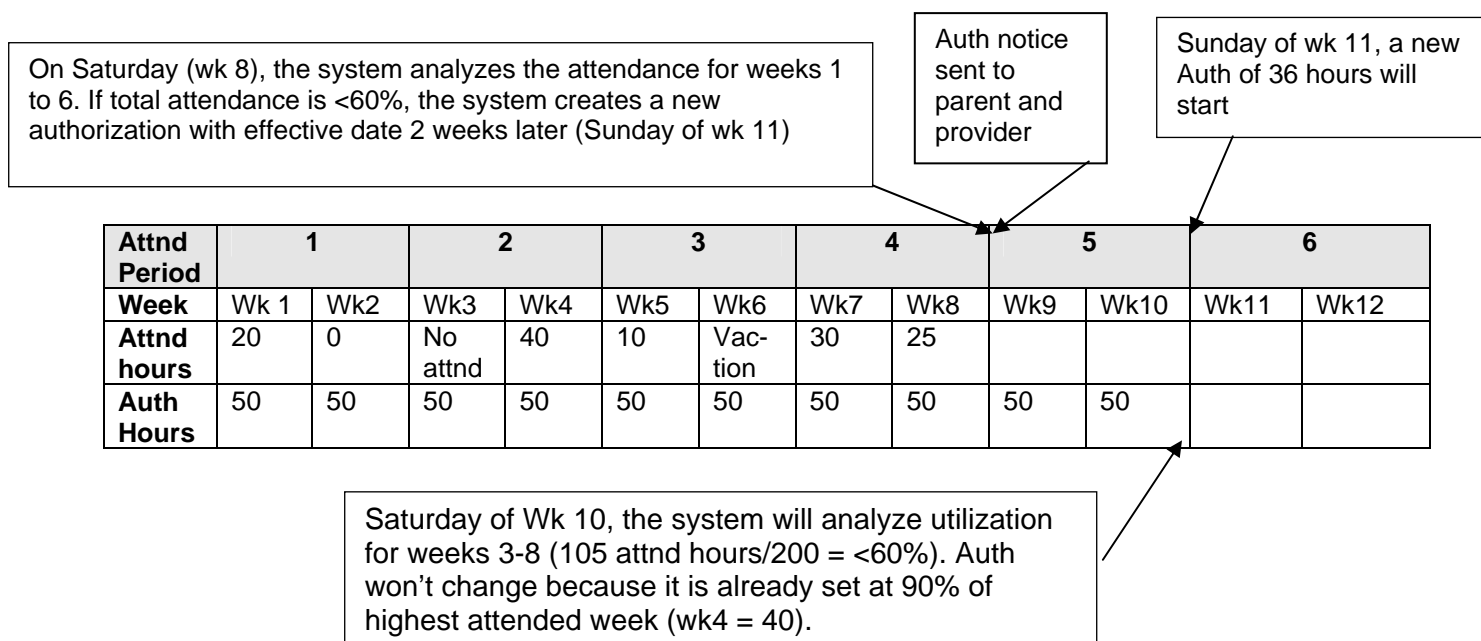
Week 1 - Total authorized hours = 50, Total attended hours = 20
Week 2 - Total authorized hours = 50, Total attended hours = 0
Week 3 - Total authorized hours = 50, Attendance has not been marked.
Week 4 - Total authorized hours = 50, Total attended hours = 40
Week 5 - Total authorized hours = 50, Total attended hours = 10
Week 6 - Total authorized hours = 50, Total attended hours = 0 with approved absence (Parent Vacation).

In the example above, the number of weeks considered as utilized is four (Weeks 1, 2, 4 and 5). Since Week 3 does not have attendance, the system ignores that week. Also, when there is an absence due to one of the reasons listed above, the system does not include that week into calculation.

Total authorized hours (Wk 1, 2, 4, 5): 200
Total attended hours for these weeks: 70

Total utilization for the above case will be 70/200 which is less than 60%. The system will adjust the authorized hours to be 90% of the highest attended week. Week 4 has the highest attendance – 40 hours. The new authorization will be 36 hours/week.

Below is a graph that shows the adjustment calculation for the above example:



PROVIDER SICK TIME

The statutory language states that the authorization adjustment calculation should not include time when the provider closed down due to illness (one full week per year—cannot be used in partial week increments). In order to be able to exclude that week from the calculation, the provider sick time must be identified in the system. A new screen will be available in CCPI where the worker can enter weeks when the provider closed due to illness. The Statutes do not authorize payment during the week the provider is closed due to illness, only to be excluded when calculating under-utilization. NOTE: The system pays the center if the center is closed one week without a valid reason. However, if there is a child who did not attend during the week prior to or after the closure, no payment is issued due to two consecutive weeks of 0-hour attendance.

Example:

Smith Family Child Care closed for the week of June 13th due to provider illness. Peter has an enrollment-based authorization to attend the Smith Child Care. Peter’s uncle takes him on a fishing trip the week after the provider closed due to illness (June 20th). In this case, the system would not pay for the weeks of June 13th and June 20th because these are not valid reasons to hold a slot. When analyzing utilization of Peter’s authorization, the system would ignore the week when the provider was ill but would include the 0-hour attendance for the 2nd week.

The provider sick-time applies to both licensed group and licensed family programs. It is not common that the entire center closes due to an illness, however, a center may use sick time if the center closes for other reasons.

In order to enter provider’s sick time into the system, access “Track Sick Time” link in the left-side navigation menu in CCPI. This screen functions the same way as the provider vacation, however, payment will not be generated if a child attends zero hours prior to or after the week of closure due to illness.

NOTICE ABOUT AUTHORIZATION REDUCTION

The system analyzes the attendance every other Saturday (end of each attendance period) and looks at attendance in the past. The Statutes require the Department to send a notice to the parent and the provider two weeks before the authorization reduction takes place. This means that if the authorization is identified as under-utilized this Saturday, the system will generate a notice and it will be mailed to the parent and provider the following Monday.

WORKER NOTICE

The Statutes also requires a notice to be sent to the subsidy agency when the authorization changes. As a result, the following new alerts have been created:

456 - AUTH ENDED - UNDER UTILIZATION

This alert is generated when the new authorization would be either zero hours or less than one hour after the system has analyzed the 90% of the highest attended week

459 - AUTH CHANGED-UNDER UTILIZATION

This alert is generated when new authorization is created with new rate.

460 – AUTH 60% UNDER-UTILIZED

These are sent when manually calculated authorizations are under-utilized. Examples are special needs children and authorizations using the 'other' rate. See Manually Calculated Authorization Section later in this memo.

NOTE: The worker alerts on authorizations will be moved from the mainframe into CSAW in the future.

APPROVED ABSENCE – HOLDING A SLOT

The Statutory language requires the Department to exclude the following reasons when calculation utilization of an authorization:

- * One week per year of vacation time for the child care provider.
- * One week per year of sick time for the child care provider.
- * Two weeks per year of vacation time for the child's parent.

DCF 201 authorizes the agencies to hold a slot due to medical leave or due to a temporary break in approved activity due to another reason (temporary layoff). These reasons have been included in the emergency rule so they can be excluded as well.

If the child is absent due to their own illness or their parent's medical leave or the parent's temporary break in activity such as layoff, and if an administrative agency worker has indicated their approval in CCPI, the system will ignore those weeks of 0-hour attendance. This means that the absence will not have an effect when calculating under-utilization as long as the absence has been approved and entered into CCPI **prior to** the authorization reduction calculation for the 6-week period.

“Hold until activity begins (2 weeks)” was eliminated per Operations Memo 07-28. “Death in the family (one week)” was in effect only during 50% under-utilization automation, which ended May 2008. These values have now been deleted from the CCPI Approved Absence page.

MANUALLY CALCULATED AUTHORIZATIONS

The following authorizations are manually calculated by the worker and the authorization rate is entered into CSAW:

- Special needs authorizations
- Authorizations using the 'other' rate

The CSAW system will not be able to re-create authorizations that have been manually calculated. If these authorizations are under-utilized, the system will send an alert (460) to the authorization worker. The worker must analyze the utilization and manually enter a new authorization at reduced hours.

TWO AUTHORIZATIONS TO THE SAME PROVIDER LOCATION

Sometimes when a child needs more than 50 hours of care, two authorizations are necessary. The system will analyze the usage of both authorizations and if the utilization falls below 60% of the total authorized hours, the system will end both authorizations and will send an alert to the worker. The worker must analyze the utilization and manually enter a new authorization.

RATE TYPE CHANGE

The system has an edit that forces the worker to use a part-time rate when creating an authorization for children 7 and older (if the authorization is less than 21 hours/week). If a school-age child (over 7) has a regular enrollment-based authorization that is more than 20 hours using the full-time rate but the utilization is less than 60% and falls below 21 hours, the system will end the authorization and will send an alert to the authorization worker if the part-time rates **does not** exist in the system. If the part-time rate is there, the system will create a new authorization using the part-time rate.

FUTURE AUTHORIZATIONS

If a slot is under-utilized and the authorization is recalculated by the system, the change will affect any future authorizations that are in place for the child.

Example 1:

Johnny is authorized at 15 hours/week during school year (Sept-June). During the review in March, the worker enters a future enrollment-based auth of 45 hours for Johnny for summer care. In the spring, the utilization of his part-time authorization falls below 60%. As a result, the system adjusts the authorization. **This will also adjust the summer authorization.** The worker must re-create it.

Example 2 (a reversed scenario from above):

Lisa is a school-age child needing fulltime care in summer (40 hours/week). At the case review in April, the worker enters a full-time authorization from June 1st to August 31. Also, she enters a 15-hour authorization starting in September. During July and August, Lisa's attendance falls below 60% and the system adjusts the authorization. The system is automated so that the **authorized hours will never increase.** In this case, the fall authorization will remain 15 hours/week.

REINSTATING AUTHORIZATIONS AFTER THE AUTOMATED ADJUSTMENT

If a parent contacts the worker after receiving a notice about reduced authorized hours to request the authorization to be reinstated at the original level of hours, the worker must review the utilization before taking action. If the hours were reduced due to a sporadic period of under-utilization and the parent's employment verification shows steady work hours, the worker can create a new authorization and reinstate the original number of hours. If the history shows that the parent's schedule varies from week to week, the authorization should be changed to attendance based. If the authorization is increased back to the original number of hours, the worker must enter case notes justifying the re-instatement.

PROVIDER NOTIFICATION

A check stuffer will be sent with 5/10 and 5/17 checks informing the providers about this change.

CONTACT

Questions on the new attendance functionality should be sent to childcare@wisconsin.gov