



TO: **Child Care Eligibility and Authorization Workers  
and Supervisors  
Income Maintenance Supervisors  
Income Maintenance Lead Workers  
Income Maintenance Staff  
Training Staff  
Child Care Coordinators**

DECE/BCCSA OPERATIONS MEMO

No: 23-31 **AMENDED**

DATE: **09/13/2023 11/17/2023**

Child Care

FROM: Junior Martin, Director  
Bureau of Child Care Subsidy Administration  
Division of Early Care and Education  
Department of Children and Families

**SUBJECT: Wisconsin Shares Registration Fees**

**CROSS REFERENCE:**

[Wisconsin Shares Handbook](#),

Section 14.4 Provider Prices and Registration Fees

Section 14.5 Written Payment Agreement

Section 14.8 Provider Reporting Requirements

Section 18.7 Subsidy and Registration Fee Availability

Chapter 19 Registration Fees (New)

Section 21.1 Parent Appeals

Appendix VI Red Flag Reports and Referrals

Appendix IX Returning Funds

**EFFECTIVE DATE:**

October 1, 2023

**Amendments: December 1, 2023**

**PURPOSE:** The purpose of this Operations Memo is to announce new policy regarding registration fees.

**BACKGROUND:** To improve the family-friendly approaches of the Wisconsin Shares Subsidy program, the department will begin providing parents who are eligible for Wisconsin Shares with limited funds to pay reasonable registration fees that child care providers may charge parents. Registration fees are fees that a provider might:

- Initially charge to enroll or register the child
- Charge on an annual basis to continue the child's enrollment

Registration fees are not transportation fees, supply fees, late pick-up fees, etc. that a provider charges separately from a registration fee. Providers are not required to charge registration fees; however, any fees they charge must be applied equally to parents receiving Wisconsin Shares and private-paying parents.

Starting October 1, 2023, parents can receive Wisconsin Shares funds to pay the provider's registration fee amount up to \$125 **per child** if the provider charges a fee. Funds for registration fees will be loaded to the parent's MyWICChildCare EBT card the same as subsidy funds and the parent will be responsible for paying the funds to the provider.

The registration fee amount applies to the child for each case on which the child is eligible, not per family. For cases with shared placement, each parent can request and receive funds for that child. However, if the child is attending the same provider for both parents, parents should communicate with each other (if possible) about who will request the registration fee so that the provider is not paid twice for the same registration fee. The provider is ultimately responsible for ensuring they do not keep payments above their registration fee amount.

Starting December 1, 2023, parents will be limited to two (2) registration fee payments in a rolling 12-month period. Also, providers will be required to report the amount of any registration fee that they charge through the Provider Portal or in writing to the local agency before a registration fee can be approved. This Operations Memo **has been** amended, and the Handbook will be updated with these policies **on December 1**.

Until system changes are made in December 2023, agency workers **must** approve all parent requests for registration fees. Workers are not expected to verify whether the provider charges a registration fee, confirm the amount, or check the date the parent was charged. Registration fee funds issued between October 1 – November 30, 2023, will not count towards the limit of two (2) registration fees in a rolling 12-month period. The two (2) registration fees in 12 months policy will be enforced systematically beginning in December with the implementation of the registration fee module in CSAW.

**POLICY:** The following new policy **highlighted in yellow** will be added to the Wisconsin Shares Handbook with the next update. Policy with ~~red-strikethrough~~ is being deleted. **Indications of the changes that were made as part of the original memo have been removed.**

#### **Section 14.4 Provider Prices and Registration Fees**

Child care providers set their own prices **and fees**. Licensed providers, public school programs, and out-of-state providers must submit their full-time and part-time weekly prices in writing to the local agency or through the Provider Portal. This is required before authorizations can be written and before the effective date of a price change.

**All providers who require parents to pay a registration fee, regardless of regulation type, must submit their fee amounts in the Child Care Provider Portal or in writing to the local agency before parents can receive funds to pay registration fees (see 19.2). If a provider does not charge registration fees, this must be indicated in the Child Care Provider Portal or reported to the local agency.**

If prices **or fees** already exist and there are current authorizations **or fee payment requests**, the local agency must record the provider's price **or fee** in CSAW with a begin date set for the first of the following month or a future month. If prices **or fees** exist, the effective date of the new price **or fee** cannot be a past date.

If prices **or fees** do not exist or there are no current authorizations **or fee payment requests**, prices **and fees** can be entered with a past effective date. **Prices and fees are separate; if prices exist with current authorizations but there are no fee payment requests, fees can still be entered with a past effective date and vice versa.**

**Example:** Kid Zone has four (4) children with authorizations to their facility. No families have requested registration fee payments for this provider. They have full-time and part-time prices entered. On January 15, Kid Zone reports a change in prices. They also report their fee amounts for the first time. The fee amount can be entered with a past effective date (i.e., December) because there are no fee requests. However, the price change can only be effective February 1 or later because there are existing authorizations.

### Section 14.5 Written Payment Agreement

Child care providers are required to have a written payment agreement with each family that receives Wisconsin Shares to attend their location. The written payment agreement contains information about the provider's payment policy including the actual price of care for each child in care. The written payment agreement between the provider and parent must include all the following:

- The provider's monthly or weekly child care price for that family
- The provider's days and hours of operation
- Any fees that the provider charges
- Any discounts or scholarships that are available to parents, and any discounts or scholarships that the parent is receiving
- The parent's payment schedule
- The provider's anticipated closure dates
- Payment expectations for the child's anticipated and unanticipated absences and days when the provider is closed
- Parent procedures for termination of a child's enrollment
- Provider procedures for termination of a child's enrollment
- Parent and provider signatures and date signed

**Note:** Providers may use the department's [Parent/Provider Written Payment Agreement form \(DCF-F-5224-E\)](#) or develop their own form that has the same information.

Providers must keep a copy of each current written payment agreement at the location where child care is provided. The provider must keep copies of expired written payment agreements for at least three (3) years after the child's last day of attendance at a location where they can be made available to the department within 24 hours.

### Section 14.8 Provider Reporting Requirements

Providers are required to report to the local agency if a Wisconsin Shares child has not attended within the previous 30 calendar days. Any facility, license, or staffing changes must be reported to the provider's licenser or certifier. Price changes for licensed providers **and registration fee changes for all providers** must be submitted to the local agency through the Child Care Provider Portal or in writing.

Licensed providers who plan to close their center for more than two (2) weeks are required to document and report the closure by submitting a Notice of Voluntary Temporary Closure to the local agency and the Bureau of Early Care Regulation (BECR).

Licensed providers are required to report all seasonal closings at least five (5) calendar days before the closing to the local agency and the Bureau of Early Care Regulation (BECR).

The Department of Children and Families conducts audits to confirm child care providers comply with program rules. If a provider is found to be out of compliance, they will receive a Provider Explanation Letter (7m letter) (see Appendix X – Provider Program Integrity).

### **Section 18.7 Subsidy and Registration Fee Availability**

Wisconsin Shares subsidy for ongoing authorizations and registration fees for future months are loaded to the parent's EBT card the evening of the last day of the month. When an authorization begins in the current month or a past month, the funds are usually loaded to the EBT card the night that the agency worker writes the authorization. Registration fee funds will also load overnight when the fee is entered for the current month or a past month.

Subsidy funds and registration fee funds are available for use up to 90 calendar days from the date the funds were loaded to the parent's EBT Card. Any amount not expended by the 90th day will be returned to the state. When a parent makes a payment to a provider the funds are deducted from the parent's subsidy balance in a last-in/first-out system.

**Example:** Ricardo has an authorization for March 1 – June 12 for his child, Zeus. His EBT card is loaded with \$300 in subsidy funds on March 1. He does not pay any funds to the provider in March. An additional \$300 for April is loaded to his card on April 1. If Ricardo only pays \$300 to his provider in April, these would be the April funds. He would need to pay more than \$300 to access the March funds. He must use the March funds before May 29 or any remaining March funds will age off the card. If May benefits are loaded to the card before he spends the March funds, he would need to pay both the May funds and March funds to avoid losing his March funds.

Subsidy funds can be used to pay the entire provider bill for ~~child care provided in~~ the current month or a past month. Use of subsidy funds is not limited to attendance. Subsidy funds cannot be paid to a provider and banked to apply for future months. If a provider needs to return funds, see Appendix IX – Returning Funds. Subsidy payments can only be applied to the child with the authorization to that provider.

## **Chapter 19 Registration Fees**

### **Section 19.1 Registration Fee Eligibility**

Parents may receive funds for registration fees that their provider charges. Registration fee amounts are specified in Section 19.2.

Registration fees are fees that a provider might:

- Initially charge to enroll or register the child
- Charge on an annual basis to continue the child's enrollment

Registration fees are not transportation fees, supply fees, late pick-up fees, etc. that a provider charges separately from a registration fee. Subsidy funds from an authorization can be used to pay those fees (see 18.7), but they are not considered registration fees.

To receive funds for a registration fee to the provider, the child must have:

- An existing authorization to that provider
- An authorization to that provider that begins 30 calendar days or less in the future
- An authorization to that provider that ended within the past 30 calendar days

For authorizations that begin more than 30 days in the future, the earliest the parent can request a registration fee is 30 calendar days before the authorization begins. The agency worker must

advise the parent that they will need to contact the agency within the period that meets **one of** the requirements above to request and receive the registration fee funds.

The provider must charge a registration fee for the parent to be eligible to receive funds for registration fees. Parents cannot request funds for registration fees more frequently than the provider charges them. **Registration fee funds are limited to one (1) payment per child per provider location within 30 calendar days.** If a parent's request for registration fee funds is questionable, the local agency should follow the guidance in Appendix VI – Red Flag Reports and Referrals for client referrals.

### Section 19.2 Registration Fee Limits

Parents may **receive** request funds to pay a provider's registration fee. **funds for** The amount is **limited** to the provider's actual fee amount up to \$125 **for each child.** If the provider's registration fee amount is more than \$125, the parent must pay any remaining amount out-of-pocket **or with regular subsidy funds, if available (see 18.7).** Each registration fee request for the child can be for the provider's fee amount up to \$125. The two (2) payments cannot be combined to create a higher one-time payment.

The parent must request any funds needed to pay the provider's fee. Funds for registration fees are never automatically added to a parent's EBT card and agency workers must not issue funds without the parent's request.

**Example 1:** Rick is requesting an authorization for his child, Mike. Rick tells the agency worker that the provider charges a \$100 enrollment fee. After the agency worker completes the authorization, they create **an ad hoc payment to issue** a registration fee request for \$100. **Both the subsidy amount and the registration fee amount are loaded overnight** to Rick's EBT card.

**Example 2:** Kai has an authorization for his child, Bai. The provider charges Kai an enrollment fee in June for Bai's enrollment in their summer program. The provider's fee is \$150. When the agency worker processes Kai's request, \$125 will be loaded to Kai's EBT card because this is the maximum amount he can receive for Bai. Kai will need to pay the remaining \$25 of the registration fee to the provider out-of-pocket **or by using authorization subsidy funds.**

Parents are limited to receiving funds for registration fees twice in a 12-month period for each child, regardless of the amount. The only time a parent can receive more than two (2) payments in 12 months is if the agency made an error in issuing a previous registration fee.

**Example 3:** Amanda received \$100 in January to pay a registration fee to her provider, Jill's Day Care, for her child, Frank. In April, she changed providers. Frank began attending Susie's Stupendous Students and Susie's required a registration fee of \$75. Amanda requested the \$75 fee, and the funds were loaded to her EBT card. In June, Amanda registered Frank for a day camp during the summer. The day camp requires a registration fee of \$50. When Amanda requests the fee for the day camp, her request is denied because she has already received two (2) fee payments for Frank in a 12-month period. Even though she did not receive the maximum amount of \$125 for the previous two (2) fees, she is not eligible for a third fee payment because fee payments are limited to two (2) in a 12-month period.

For shared placement, each parent who has the child eligible on their case can request and receive funds to pay registration fees for the provider's fee amount up to \$125 **twice in a 12-month period.** Workers must remind parents to communicate with the other parent (if possible)

to avoid paying the same provider twice for the same registration fee. If a provider needs to return funds, see Appendix IX – Returning Funds.

If the family is charged a per family amount and not a per child amount, the agency worker must split the family fee amount equally between the children with authorizations to that provider and enter a request for each child.

**Example 4:** Cindy has three (3) children that she is enrolling at Jenna’s Gems. Jenna’s Gems charges a per family registration fee of \$120. Jenna contacts the local agency to request funds to pay this registration fee. The worker splits the fee among the three (3) children and enters a request for \$40 for each child.

**Example 5:** Fatima has three (3) children. Fatima is enrolling all three (3) children at Beloved Children. Beloved Children charges a per child enrollment fee of \$50. Fatima requests registration fees for each of the children. The worker enters the \$50 request for each child.

### Section 21.1 Parent Appeals (relevant addition only)

Parents have the right to appeal decisions made regarding their case, including but not limited to:

- Overpayments, including the determination, amount, lien/levy action, or certification to the Department of Revenue
- Denial of an application in whole or in part
- Failure to act on an application within 30 calendar days
- Reduction, suspension, or termination of child care subsidy payments
- The determination of the amount and initial eligibility date of receipt of child care subsidy payments, including registration fee amounts and denials
- Denial of a request for a hardship authorization (see 17.3.1)
- Issuance of an Intentional Program Violation (IPV)

### Appendix VI Red Flag Reports and Referrals (relevant addition only)

#### Client Referral Examples

Examples of scenarios that warrant a child care client referral include, but are not limited to:

- Frequent requests in a short period for registration fee funds to the same provider

### Appendix IX Returning Funds

#### Voluntary Repayment Agreement (VPA)

The VPA process occurs when a provider agrees to return funds to the Wisconsin Shares program. Providers cannot be compelled to return funds through the VPA process.

The VPA may only be used when the funds were paid to the provider. If the funds are still on the card, see Retractions.

If the provider elects to return the funds through a VPA, the provider must complete the [Voluntary Repayment Agreement form \(DCF-F-5178-E\)](#).

**VPA Process FAQ**

Question	Answer
When should providers return funds through a VPA?	Providers can voluntarily return funds for the following circumstances, including but not limited to: <ul style="list-style-type: none"> <li>• Child was absent for 30 calendar days or more</li> <li>• Payment was made to an incorrect provider or incorrect provider location</li> <li>• Provider refused to care for the child or disenrolled the child</li> <li>• Provider was closed, except for closures up to 14 consecutive calendar days related to COVID-19 exposure, and closures on legal holidays</li> <li>• Parent was ineligible for the funds paid to the provider</li> <li>• Provider received funds in error</li> <li>• Provider received more funds than the cost of care for the child (see 18.7)</li> </ul>
Where should providers return VPAs?	Bureau of Child Care Subsidy Administration (BCCSA), Program Integrity: <a href="mailto:Childcare@wisconsin.gov">Childcare@wisconsin.gov</a>
How should providers return the VPA?	Providers may return a VPA via mail, email, scan, or fax.
What happens when the VPA transaction is not successful?	BCCSA will send providers a VPA Failure Notice with instructions on how to repay the funds to DCF.
Can providers mail the VPA to BCCSA with a manual check?	Yes. See the Contact Us tab for BCCSA's mailing address.
What if the provider refuses to use a VPA?	A VPA cannot be enforced upon a provider. However, the local agency is responsible for determining if a referral or investigation is appropriate.

**CSAW CHANGES:**

Starting October 1, 2023, workers will be able to issue ad hoc registration fee payments. CSAW users with Profile G (worker) and CC Coordinator/Supervisor access will be able to create this type of ad hoc payment. Unlike other ad hoc functionality, the worker does not have to wait for benefits to process before creating the ad hoc payment; the registration fee ad hoc adjustment can be created on the same day the authorization is written. After the ad hoc payment is created, funds for a current or past month will load to the parent's card that night. Fees that are entered for an authorization that begins in the future will load at the same time as the monthly authorization benefits.

Starting December 1, 2023, a registration fee module will be implemented within CSAW. This module will make it easier for agency workers to create registration fees and will systematically enforce the two (2) in 12 months limit, the requirement for a provider to have a fee amount

entered in CSAW, and the issuance of the lower of the provider's fee amount or \$125. It will also allow local agencies to deny registration fee requests when required by policy.

**CONTACTS:**

For Wisconsin Shares policy questions outside of Milwaukee County contact your Bureau of Regional Operations (BRO), Child Care Coordinators at [BROCCPolicyHelpDesk@wisconsin.gov](mailto:BROCCPolicyHelpDesk@wisconsin.gov).

For Program Integrity technical assistance, Child Care CARES/CWW and CSAW Processing Questions statewide, and policy questions in Milwaukee County, contact the Child Care Help Desk at: [childcare@wisconsin.gov](mailto:childcare@wisconsin.gov) or 608-422-7200.

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