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**State of Wisconsin
Governor Scott Walker**

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: Jill Chase, Director
Bureau of Early Care Regulation
Division of Early Care and Education

DECE/BECE OPERATIONS MEMO		
No: 12-72		
DATE: 12/26/2012		
FS <input type="checkbox"/>	MA <input type="checkbox"/>	BC+ <input type="checkbox"/>
SC <input type="checkbox"/>	CTS <input type="checkbox"/>	FSET <input type="checkbox"/>
BC+ Basic <input type="checkbox"/>	BC+ CORE <input type="checkbox"/>	
CC <input checked="" type="checkbox"/>	W-2 <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"/> *
EP		

SUBJECT: Scanned Certification Documents and Records Retention

CROSS REFERENCE: Ops Memo [11-41](#) – Certification Records Retention
[WISCCRS User Guide – Documents](#)
[RDA 372](#)
[ADM Chapter 12](#)

EFFECTIVE DATE: IMMEDIATELY

PURPOSE:

This Operations Memo provides guidance about preservation of scanned certification records to ensure the authenticity, reliability and accessibility of scanned records.

BACKGROUND:

All Department of Children and Families records related to certification of child care must be trustworthy, complete, accessible, legally admissible in court, and durable for the required record retention period. This includes records obtained by and stored by local agencies.

Scanning changes the record from a paper format to an electronic format; thereby making storage of records more efficient. Scanning also enables certification agencies to more easily share and access information. The process of scanning documents

requires quality control to ensure that the documents that are scanned are the same as the original paper document.

Operations Memo [11-41](#) and [RDA 372](#) requires certification agencies to retain certification records for six (6) years after closure of the certified facility. [Wis. Stat.16.61\(5\)](#) and [ADM Chapter 12](#) of the Wisconsin Administrative Code outlines requirements for the transfer of public records to electronic format and rules for electronic records management.

With the roll out of Wisconsin Child Care Regulatory System (WISCCRS) and increased functionality in uploading electronic documents, as well as the efficiencies of electronic records retention, it is critical the certification agencies develop policies and procedures to comply with the requirements outlined below.

POLICY/PROCESS CHANGES:

Certain certification records, including plans of correction, compliance statements and sanction letters must be scanned or converted to an electronic format and uploaded to the correct operator record in WISCCRS. In addition to these required documents, additional documents may be scanned and retained as an electronic record in WISCCRS, such as Background Information Disclosure Forms, Department of Justice rap sheets, certificates of insurance.

Once converted to an electronic format, the original paper copy may be destroyed after 30 days if the local agency or tribe has verified that the electronic record:

- 1) Was successfully uploaded to the correct operator record in WISCCRS in a readable format ; and
- 2) Is an exact replica that contains all information included in the original paper copy, such as any writing and text in margins, footnotes, multiple ink colors, watermarks, notary seals.

If the scanned document or image is not legible and not identical in every way to the paper copy, the paper copy must also be retained in accordance with record retention requirements.

Examples:

1. If a monitoring checklist was filled out using different colored inks to signify different visits and was then scanned and retained in black and white, it would not comply with the [ADM Chapter 12](#) and, therefore, the paper copy would also need to be retained.
2. If a paper copy includes a watermark or raised seal but the watermark or seal is not visible in the scanned document, it would not comply with [ADM Chapter 12](#); and, therefore, a paper copy would also need to be retained.
3. If when using an automatic document feed, the resulting scanned document is crooked and cuts off information at the borders or corners, and the scanned document is not identical to the original, the original paper copy would need to be retained.

4. Pay particular attention when verifying the accuracy of two-sided documents to ensure the scanned document captures both sides of the original.

AUTOMATION:

Certification agencies are required to upload the following mandatory documents in WISCCRS, as outlined in the [WISCCRS User Guide - Documents](#): W9 form, sanction letters, plans of correction, and compliance statements.

WISCCRS limits the size of documents to 4 megabytes or smaller. If the user tries to upload a document larger than 4 megabytes the system will display a message “unable to process”. Although colored documents can be uploaded into WISCCRS, black and white scanning is recommended in order to limit the size of the document. In such cases, the hard copy document must also be retained if color signifies or conveys critical information.

When scanning documents in such a way that compresses or reduce document size or changes the resolution, the certification agency must ensure the scanned document is legible and conveys all of the same information the paper copy conveyed.

See the [WISCCRS User Guide-Documents](#) for more information regarding optimal scanning.

ACTION REQUIRED:

Certification agencies shall:

- 1) Scan and upload all mandatory documents into the correct operator record in WISCCRS as outlined in the [WISCCRS User Guide](#).
- 2) Develop quality control procedures to ensure that all paper documents converted to electronic format are:
 - a) identical in every way to the original paper copy.
 - b) uploaded into the correct operator record; verified for accuracy; and, retained for 30 days after conversion.
 - c) are retained and accessible in accordance with the [RDA](#) and Operations Memo [11-41](#).
- 3) If the certification agency scans and stores records into systems other than WISCCRS, the agency must have disaster recovery procedures to ensure that the records are accessible for the appropriate retention periods in accordance with [RDA 372](#), [ADM Chapter 12](#), and [Wis. Stat. s. 16.61\(5\)](#).

CONTACTS:

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