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**State of Wisconsin  
 Governor Scott Walker**

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

**FROM:** Kath McGurk, Director  
 Bureau of Early Learning and Policy  
 Division of Early Care and Education  
 Department of Children and Families

DECE/BELP OPERATIONS MEMO					
<b>No:</b> 15-10 <b>AMENDED</b>					
<b>DATE:</b> 3/20/2015					
<b>FS</b>	<input type="checkbox"/>	<b>MA</b>	<input type="checkbox"/>	<b>BC+</b>	<input type="checkbox"/>
<b>SC</b>	<input type="checkbox"/>	<b>CTS</b>	<input type="checkbox"/>	<b>CC</b>	<input checked="" type="checkbox"/>
<b>W-2</b>	<input type="checkbox"/>	<b>FSET</b>	<input type="checkbox"/>	<b>EA</b>	<input type="checkbox"/>
<b>CF</b>	<input type="checkbox"/>	<b>JAL</b>	<input type="checkbox"/>	<b>JC</b>	<input type="checkbox"/>
<b>RAP</b>	<input type="checkbox"/>	<b>WIA</b>	<input type="checkbox"/>	<b>Other</b>	<input type="checkbox"/> *
				<b>EP</b>	

**SUBJECT: Reporting Attendance for Reimbursement from Wisconsin Shares**

**CROSS REFERENCES:** [Wisconsin Statutes 49.155\(6m\)\(a\)](#)  
 Child Care Policy Chapters 2.2.4, 3.2.4, 3.9.0, and 3.11.7

**EFFECTIVE DATE:** April 1, 2015

**PURPOSE:** This Operations Memo provides clarification on the attendance hours that a child care provider must report on their Daily Attendance Record or Sign In/Sign Out (SISO) sheets, their Attendance Report Forms (ARF), and in the Child Care Provider Information (CCPI) system.

**BACKGROUND:** A child care provider is required to maintain a written record of the daily hours of attendance of each child, including the actual arrival and departure times for each child. The SISO sheet is used for this purpose, in compliance with licensing, certification and Wisconsin Shares policies. The ARF and the CCPI system are used to report attendance to and request reimbursement from the Wisconsin Shares program.

**POLICY:**  
**Attendance Records**

Licensed Group, Licensed Day Camp, Licensed Family, and Certified child care providers are required to maintain a current written record of the daily hours of attendance of each child in care, including the actual arrival and departure times for each child.

**Attendance Reporting**

Wisconsin Shares Program Integrity staff may compare the SISO sheets to the ARF or attendance reported by the child care provider in the CCPI system for Wisconsin Shares reimbursement.

In most circumstances, the time reported for reimbursement from the Wisconsin Shares program will be the same hours the child was in attendance as recorded on the SISO sheets. However, there are some situations where child care providers should not report time for reimbursement from Wisconsin Shares. This includes, but is not limited to, the following situations:

- Child care is provided above the provider's regulated capacity;
- Child care is provided outside of the provider's regulated hours or days of operation;
- The parent is paying for the care him or herself or the child care provider is not requesting payment for the care;
- The child is in shared placement and the attended time is for care provided when the child is not with the parent with the Wisconsin Shares subsidy.

When the SISO sheets contains more hours than the ARF due to the above situations, the child care provider must document the reasons by attaching the information to the SISO sheets., and if reporting electronically, the provider must contact the county or tribal agency to notify them of this difference.

The Department of Children and Families (DCF) encourages parents to sign the weekly SISO sheets after they are filled out by the provider to help ensure accurate reporting of hours. The agency will only process the ARF for hours within the hours of operation. When attendance is reported for reimbursement outside of the child care provider's hours of operation, the local agency will report this information to the DCF Bureau of Program Integrity.

**Example:** Child care provider opens at 7 a.m., but 5 children arrive at 6:50 a.m. The SISO sheet must indicate that the children arrived at 6:50 a.m., even if this is outside the hours of operation.

**Example:** Sam's authorization is for 30 hours each week. His mom Jaime works only 20 hours one particular week and Sam is in care for only 23 hours. The child care provider must report 23 hours of attendance for reimbursement from the Wisconsin Shares program.

**Example:** Anthony's authorization is for 30 hours per week and he attends a child care program from 9:00 a.m. to 3:00 p.m. On one particular day Anthony's mother has asked the child care provider to keep Anthony until 6:00 p.m. so that she can attend a dentist appointment and stop at the grocery store. The child care provider's regulated hours of operation are from 6:00 a.m. to 6:00 p.m. and the child care provider will not be over-capacity if Anthony were to stay the extra 3 hours. The provider must accurately record attendance on the SISO sheet from 9:00 a.m. to 6:00 p.m.; and must note that care provided from 3:00 p.m. to 6:00 p.m. will not be reimbursed by Wisconsin Shares, as this extra time was agreed upon by the child care provider and the parent.

A child care provider may report concerns about the misuse of the child care subsidy to the local agency or DCF for investigation and recoupment against the parent. This can be reported to DCF at [dcfmbchildcarefraud@wisconsin.gov](mailto:dcfmbchildcarefraud@wisconsin.gov) or at 1-877-302-3728.

### **Shared Placement of Children**

When two parents have shared placement of their children, the authorization worker is responsible to communicate to the child care provider that attendance should only be recorded **reported for reimbursement** for those days that the child is under the care of the parent with the Wisconsin Shares subsidy.

To ensure the accuracy of attendance reporting for reimbursement from the Wisconsin Shares program in a shared placement case, the authorization worker is responsible for:

1. Collecting a shared placement schedule that illustrates the days that the child is with each parent and collecting updates when the schedule changes;
2. Writing the authorization for the maximum number of hours the parent needs in order to attend the approved activities;
3. Using an attendance based authorization;
4. Communicating the shared placement schedule with the staff that enter or confirm the CCPI system attendance entry; and,
5. Informing the child care provider of the shared placement schedule.

A shared placement schedule can be collected on a monthly calendar or by using the [Child Care Authorization Worksheet](#). The authorization must cover the maximum number of hours each parent will need for the approved activity plus travel time. Any hours incorrectly reported to the Wisconsin Shares program for reimbursement based on misinformation (or lack of information) from the client, may result in an overpayment against the client.

### **CHILD CARE PROVIDER AGREEMENTS**

The child care provider agreements that are on the ARF and in the CCPI system have been updated as shown below. The **highlighted** areas identify the changes.

- I understand that I must **report** the actual hours of attendance for each **Wisconsin Shares eligible**-child in care on each Child Care Attendance Report Form, even if the authorization is based on enrollment.
- I understand that I must notify the local Child Care agency if I become aware that a child is no longer attending the Child Care facility. I can notify the local agency by phone, in writing or by entering a "T" in the Special Use Section on the Child Care Attendance Report Form.
- I understand that I am responsible for paying back any overpayment that is caused by any of the following reasons: 1) Provider not reporting attendance accurately; 2) Provider not notifying the agency in a timely manner when a child is no longer in care; 3) Provider caring for more children than the certification or licensing rules allow; 4) Provider caring for children outside of the hours authorized by his or her certification or license; 5) Provider caring for children for more hours per day than permitted by certification or licensing rules; 6) Provider caring for children at a site other than the regulated site or an area other than a scheduled field trip; 7) **Provider reporting hours for reimbursement during a time that a parent with a shared placement agreement is not responsible for the child(ren); 8) Authorization or attendance related administrative error by the subsidy agency or any other overpayment as determined by the Department.**

- I understand that overpayments are deducted from future issuances. If no future issuances will be made, the overpayment must be paid back directly to the local agency.
- I understand that if I **report any inaccurate attendance information for reimbursement**, I may be referred for investigation.
- I understand that in order to receive payment, I must submit attendance either through paper Child Care attendance reports or through the Internet, if I have access to submit attendance online.
- I understand the local agency may refuse to process attendance that is submitted for a period more than 90 days in the past.
- I understand the local agency has 10 days to process attendance report forms from the date of submission. This timeframe may be extended for program integrity concerns.
- I understand the local agency will refuse to process my attendance report form if there are errors on my report or if the instructions on the form are not followed.
- I understand that the local agency has the authority to stop payment and/or authorizations if I am not in compliance with **Wisconsin Shares, YoungStar**, certification or licensing rules or if I have submitted inaccurate attendance information **for reimbursement**.
- I understand that I must keep a written record of each child's actual hours of attendance at the Child Care facility for a minimum of three years beyond the last date of child's attendance.
- I understand that the State of Wisconsin and/or the local Child Care agencies have the right to visit the center to monitor my compliance with program requirements, including keeping accurate attendance records. Monitors may review records on site, copy records on site, or arrange to remove original records for review and copying, with proper receipt. I understand that I must provide this access immediately upon request.
- I understand that if I do not sign this agreement, the agency will refuse to process my attendance report form and I will not receive payment.

These changes will be reflected on ARF and CCPI provider agreements on March 27, 2015.

## CONTACTS

For Child Care policy questions outside of Milwaukee County: Bureau of Regional Operations (BRO), Child Care Coordinators at [http://dcf.wisconsin.gov/regional\\_operations/pdf/contact\\_list.pdf](http://dcf.wisconsin.gov/regional_operations/pdf/contact_list.pdf)

For Child Care CARES/CWW, CSAW and CCPI IT systems processing questions statewide, program integrity questions and policy questions in Milwaukee County: Child Care Help Desk at [childcare@wisconsin.gov](mailto:childcare@wisconsin.gov) or (608) 264-1657.

\*Program Categories – FS – FoodShare, MA – Medicaid, BC+ – BadgerCare Plus, SC – Senior Care, CTS – Caretaker Supplement, CC – Child Care, W-2 – Wisconsin Works, FSET – FoodShare Employment and Training, CF – Children First, EA – Emergency Assistance, JAL – Job Access Loan, JC - Job Center Programs, RAP – Refugee Assistance Program, WIA – Workforce Investment Act, \*Other EP – Other Employment Programs.

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