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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**

FROM: Kath McGurk, Director
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| DECE/BELP/BPI OPERATIONS MEMO | | | | | |
|----------------------------------|-------------------------------------|----------------------|--------------------------|-------|--------------------------|
| No: | | 15-34 AMENDED | | | |
| DATE: | | 09/30/2015 | | | |
| 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: Wisconsin Shares Policy Manual Chapters 1 - 4

CROSS REFERENCE: Wis. Stat. 49.155, DCF 201

EFFECTIVE DATE: September 30, 2015

PURPOSE: This memo introduces the revised Wisconsin Shares Policy Manual. All Operations Memos through September 29, 2015 have been incorporated into this release of the Manual. The new PDF version of the Manual is located at the same web address where it has been: <http://dcf.wisconsin.gov/childcare/wishares/manual.htm>. A link to the RoboHelp version is available at: <http://dcf.wisconsin.gov/childcare/ccpolicymanual/>

This revision includes information that was previously published in Operations Memos, technical corrections and wording changes to clarify policy intent.

The previously published Child Care Policy Manual will remain available for reference during case reviews that cover the past period. All expired manuals are available at <http://dcf.wisconsin.gov/childcare/wishares/expiredsharesdocs.htm>.

POLICY MANUAL UPDATES: Chapter 1 and 2 has been reorganized to be logically ordered. Chapter 2 contains policies that were formerly in Chapter 3. Some sections from Chapter 1 have been moved to Chapter 2. The overall organization of the Wisconsin Shares Child Care Policy Manual has been changed and is now organized as follows:

Chapter 1: Eligibility
 Chapter 2: Authorizations
 Chapter 3: Program Integrity Client Fraud
 Chapter 4: Program Integrity Child Care Provider Fraud

This memo has two attachments to show where policies from Chapters 1 and 3 of the December 2013 version can be found in Chapters 1 and 2 in the September 2015 version.

It is recommended that agency staff spend some time becoming familiar with the new locations of policies and structure of the new manual.

Previously Published Operations Memos:

The revised Chapters 1 and 2 have incorporated all previously published Operations Memos. The chart below shows where the Operations Memos have been incorporated into the new policy manual and the location of the information.

| Operations Memo # | Subject | Child Care Manual Location |
|--------------------------|---|--|
| 13-42 | Tiered Reimbursement change: 4 Star Program adjustment from 5% to 10% | 2.5 Tiered Reimbursement |
| 14-12 | Licensed day camps must now participate in YoungStar | 2.5.1 Participation in the YoungStar Quality Rating Improvement System |
| 14-23 | Fingerprint requirements for child care certification | 2.1.1 Fingerprint-Based Background Checks |
| 14-26 | Exemption from self-employment authorization limit of foster parents, subsidized guardians, interim caretakers, and relatives with a court order who receive Kinship Care benefits | 2.2.8.3 Self-Employment in Foster, Subsidized Guardianship, Interim Caretaker, and relatives with Court-Ordered Placement Receiving Kinship Care |
| 14-29 | Telephonic and Electronic Signature Enhancements | 1.3.5 Signature Requirements |
| 14-39 | Completing Attendance Report Forms (ARFs) within 10 days from submission. | 2.6.7 Late Attendance Reporting |
| 14-J5 | Wisconsin Shares will be provided for all W-2 placements types and activities on the Employability Plan or Learnfare Case Management Plan. This applies to all Tribal TANF activities assigned on an Individual Service Plan. | 1.4.8.1 Learnfare; 1.4.8.4 Participation in a Tribal TANF Program; 1.4.8.5 Participation in W-2 Program; 2.2.16 Changing and Ending an Authorization |
| 15-06 | Interviews after ACCESS applications must be scheduled to take place within five (5) business days. | 1.3.2.3 Apply Online Through ACCESS |
| 15-08 | 2015 Federal Poverty Level changes for Wisconsin Shares | 1.5.1 Gross Income |
| 15-09 | 2015 Wisconsin Shares co-payment adjustments to the co-payment calculation because of Federal Poverty Level changes. | 2.3.1 Wisconsin Shares Child Care Subsidy Program Copayments |

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|-------|--|---|
| 15-10 | Attendance reporting for reimbursement from Wisconsin Shares | 2.7.1 Confirmation Agency, 2.7.2 Non-Confirmation Agency, 2.2.15 Shared Placement Authorizations, 2.2.15.1 Two Parents Using the Same Provider, and 2.2.15.2 One Parent |
| 15-12 | Requirement for SSN or SSN application for children receiving Wisconsin Shares | 1.4.6 Social Security Numbers |
| 15-13 | Child Support cooperation requirements for Wisconsin Shares | 1.4.7 Child Support Cooperation |
| 15-14 | Unearned educational aid income | 1.5.2, 1.5.3 Included and Not Included Income |
| 15-24 | Online education as an approved activity | 1.4.8.9 Online Education |
| 15-25 | Employment verification for Wisconsin Shares | 1.6.2.2 Financial Eligibility Verification |
| 15-28 | Child Care and school program collaboration | 2.2.13 School Program Collaboration |
| 15-31 | Applying Discounts to Wisconsin Shares Reimbursements | 2.4.5.2 Discounts |
| 15-33 | Using the Electronic Case File for Confidential Documents | 1.1.4 Confidentiality |

Summary of Changes in Program Integrity Policy (Chapters 3 and 4):

Chapters 2A Program Integrity Client Policy Manual and 2B Program Integrity Provider Policy Manual are now chapters 3 and 4. All references to Fraud Detection and Investigation Unit (FDIU) have been replaced with the Bureau of Program Integrity (BPI).

| New Location | Summary of Changes |
|--|--|
| 3.4.2 Investigations – Findings and Enforcement | Updated to include the penalty period for a child care IPV, removed Waiver of Administrative Disqualification Hearing and Disqualification Consent Agreement since they no longer apply to child care IPV's and added the 10-year child care IPV. |
| 3.5.1 Overpayments – Policy Overview Overpayments related to Eligibility and Overpayments related to Need for Care Classification of Client Overpayments | Updated to reflect the changes that should be reported according to the recently revised parent authorization notice. The revised policy also provided guidance on when an overpayment related to eligibility or need for care would be calculated based on whether it was reported timely or untimely. Updated the definition of an Intentional Program Violation (IPV). |
| 3.5.2 Overpayments – Recovery Notice to Additional Liable Individuals | Updated this section in accordance with the Collection Centralization Operations Memo (15-J8) that took effect on September 1, 2015, which states a manually added liable individual will receive a system generated notice from CARES. |

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| 3.6 Intentional Program Violation (IPV) – Appeal Process | This section is added to the revised Policy Manual. |
| 3.7.2 Collections – Collection Process Posting a Client Payment | Updated this section in accordance with the Collection Centralization Operations Memo (15-J8) that took effect on September 1, 2015, which states that a local agency can no longer post clients payments to the Benefit Recovery (BV) system and must forward the payment to DCF Public Assistance Collection Unit (PACU). |
| 3.10 Contact Information | Updated BPI's contact information. |
| 4.2.3 Authorization Utilization | Parents who are also child care providers was added to reflect the provider waiver law that went into effect in 2012. |
| 4.3.3 40% Rule - Enforcement | Updated information on six and two week notices to providers and copy BRO child care coordinator. |
| 4.4.3 Attendance Reporting, Billing and Retention - Detection | Added second paragraph to reflect the amended Reporting Attendance for Reimbursement from Wisconsin Shares Operations Memo (15-10) stating that there may be differences in the hours reported and the actual attendance hours. |
| 4.6.2 Investigations – Findings and Enforcement E. Permanent suspension/withholding of payment to a provider [s. 49.155(7)] | Added reference to suspension under Wis. Stats s. 49.155 (7m) in addition to (7)(b). Added reference to On Site Indicators to include falsifying the YoungStar Registry profile in order to receive a higher YoungStar payment. |
| 4.7.1 Overpayments – Policy Overview | Intentional Program Violation (IPV) to include intentionally falsifying YoungStar Program Profile information. |
| 4.7.8 Personal Liability for an Overpayment | This section is added to inform providers that they may be found personally liable for overpayment if their business, corporation or LLC is unable to repay the department. |
| 4.11 Contact Information | Updated BPI's contact information. |

Policy Clarification that is Included in The Revised Manual:

The revised manual includes policy clarifications on the following topic areas:

Temporary Absence

An adult can no longer be considered temporarily absent from a household. If an adult is a marital or non-marital co-parent living in the household s/he is considered to be part of the household. Any parent is presumed to continue to reside in the household unless a child support referral has been made.

An individual who is incarcerated for 30 calendar days or fewer is considered part of the Assistance Group, unless a child support referral has been made. A parent who is incarcerated for more than 30 calendar days is excluded from the Assistance Group and must be identified on the Absent Parent Page in CARES Worker Web, and child support cooperation requirements will apply. Section 1.4.1.1

Minor Parents

Policy for minor parents has been clarified to state that minor parents must be living in a group home licensed by the State of Wisconsin or an approved and supervised independent living situation, and be enrolled in high school, or be married in order to be eligible for Wisconsin Shares. Section 1.4.2

Unsubsidized/Subsidized Employment

Wisconsin Shares no longer makes a distinction between subsidized and unsubsidized employment. Employment is now defined as an activity which produces income *such as* regular employment, self-employment, and employer sponsored training, apprenticeship, sheltered employment, and participation in a program such as Americorps employment program. Section 1.4.8.3

On Call Employment

On-call employment may be considered a type of employment. Section 1.4.8.3.3

Collateral Contact

When the agency worker is assisting the client to obtain earned income and employment verification when no other source can be obtained, collateral contact is an acceptable form of employment verification. The worker must document the phone conversation in CWW case comments including the date and time, and name and phone number of the person that was contacted. Section 1.6.2.2

Attendance Based Authorizations to Licensed Group Providers

Previous policy stated that authorizations to licensed group providers may be established on an attendance basis if a child has a history of widely varying attendance. This has been clarified to state that attendance based authorizations to licensed group providers may be used if the parental need for child care is expected to vary widely or if the agency has documented three separate occasions where the provider significantly over reported the attendance for reimbursement. Section 2.2.9.1.1

Changing/Ending Authorizations, Reasons for Changing Authorizations, When Changes are Reported After Taking Effect, When Changes are Reported Prior to Taking Effect, and Ending Authorizations

This information has been compiled into a chart. Please review section 2.2.16 for guidance and examples.

10-Day Notice When Changing Authorizations

The policy manual previously included a requirement to provide a 10-day notice to child care providers when a parent loses eligibility, except when they failed to report a change has been removed from the manual. There is no requirement to provide such notice.

Previous policy stated, “If a change is reported by the provider regarding a family’s circumstance, the local agency must confirm this information with this family and take the appropriate action within 10 working days.” Agencies must take appropriate action as soon as possible for any authorization changes. Section 2.2.16

Changing Attendance Reporting Modes

The revised Policy Manual Section 2.6.2 Changing Attendance Reporting Modes clarifies that the agency, child care consortia, and MECA may change the provider mode to any of the attendance reporting modes (In/Out, Daily, or Weekly). Section 2.6.2

Attachments:

Chapter 1 Crosswalk
Chapter 2 Crosswalk

CONTACTS:

For Wisconsin Shares Child Care policy questions outside of Milwaukee County contact your Bureau of Regional Operations (BRO), Child Care Coordinators at http://dcf.wisconsin.gov/regional_operations/pdf/contact_list.pdf

For Child Care CARES/CWW, CSAW and CCPI Processing Questions statewide and policy questions in Milwaukee County contact the Child Care Help desk at: 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, BC+ Core – BadgerCare Plus Core, 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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