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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

No: 16-30

DATE: 09/23/2016

Child Care

**SUBJECT: Child Support Cooperation Review Process for WREA Consortium
Child Care Workers during Phase 1 Implementation of
MyWIChildCare**

CROSS REFERENCE: Wisconsin Shares Child Care Subsidy Policy Manual section
1.4.7
Operations Memos 15-13 and 15-J5

EFFECTIVE DATE: October 1, 2016

PURPOSE: To inform all Western Region Economic Assistance (WREA) consortium Child Care workers of the need to review the child support cooperation in CARES Worker Web (CWW) when writing child care authorizations in the new Electronic Benefit Transfer Child Care Statewide Administration on the Web (EBT CSAW) system for the period of October 1, 2016, to February 1, 2017.

BACKGROUND: On June 6, 2015, enhancements were made to the current Child Care Statewide Administration on the Web (CSAW) to prevent authorizations from being written for a Child Care assistance group that was ineligible due to child support non-cooperation. In addition, CSAW was enhanced to end any current authorizations on the Saturday following the first of the month that a Child Care assistance group closed due to child support non-cooperation. If the first of the month happened to be a Sunday, the authorization was ended as of the last day of the previous month.

Currently, Wisconsin Shares is in the process of implementing the MyWICChildCare initiative. The purpose of the MyWICChildCare initiative is to transition Wisconsin Shares from a program that reimburses child care providers via state-issued retrospective payments toward a program with parent-initiated payments from an electronic benefit transfer (EBT) card. As part of this initiative, the new EBT CSAW system was built so Child Care workers could write authorizations for a case and the system will prospectively load subsidy amounts to the parents' EBT card. As of July 11, 2016, all Child Care workers across the state have been able to write authorizations in the new EBT CSAW system, in addition to the current CSAW system, in order to support the authorization conversion process.

On October 1, 2016, WREA consortium Child Care workers will fully implement Phase 1 of the MyWICChildCare initiative and will primarily be using the new EBT CSAW system to write authorizations. The new EBT CSAW system does not include any of the child support cooperation enhancements that were added to the current CSAW system on June 6, 2015. Therefore, it is important that WREA consortium Child Care workers are reviewing the child support cooperation status of a Child Care assistance group before writing an authorization and that they use the appropriate end date for the authorization if the Child Care assistance group is not cooperating with child support.

In January 2017, Wisconsin Shares will implement enhancements to CWW that will again support the child support cooperation policy statewide.

POLICY: There are no Child Care policy changes associated with this memo.

PROCESS: As programmed, the new EBT CSAW system will correctly end all authorizations at the end of the month when eligibility is run in CWW prior to the adverse action date to close a Child Care assistance group. In addition, the new EBT CSAW system will not allow Child Care workers to write authorizations for Child Care assistance groups that are already closed.

However, when eligibility is run after the adverse action date to close the Child Care assistance group for failure to cooperate with child support, there is a risk that an authorization could be mistakenly written and subsidy amounts loaded to a parent's EBT card for the following month because there is no systematic stop to prevent such action.

This issue is solely limited to situations where eligibility was run in CWW after the adverse action date to close the Child Care assistance group for failing to cooperate with child support.

In order to make sure that WREA consortium Child Care workers are reviewing the child support cooperation information before writing authorizations in the new EBT CSAW system and are using the appropriate end date when the Child Care assistance group is not cooperating with child support, the following process should be used:

1. WREA consortium Child Care workers must review the child support cooperation information on the following pages in CWW before writing any authorizations in the new EBT CSAW system:

- a. **Confirmed Assistance Group Eligibility History page:** The WREA consortium Child Care worker must review the Child Care eligibility history information. If the Child Care assistance group is currently failing for reason codes 211, 212, or 213, the new EBT CSAW system will not allow an authorization to be written. If the Child Care assistance group is failing for reason codes 211, 212, or 213 for a future month and a new authorization needs to be written, the authorization must be written with an end date that is no greater than the last day of the month that eligibility was run to fail the Child Care assistance group for child support non-cooperation.

Example 1: Tina is not cooperating with child support. The Confirmed Assistance Group Eligibility History page indicates that eligibility was run on September 19, 2016, (after the adverse action date in CWW) to fail the Child Care assistance group for reason code 211 as of November 1, 2016. Any new authorizations written for this case must have an end date that is no greater than September 30, 2016, as, per policy, the Child Care assistance group is not eligible for Child Care in October.

Confirmed Assistance Group Eligibility History											
Case Information											
Assistance Group: CC - CHILD CARE								Sequence: 1			
Benefit Details											
Benefit Begin Date	Benefit End Date	Date Confirmed	Eligibility Status-Non Financial	Eligibility Status-Asset	Eligibility Status-Income	Benefit Amount	Net Change Amount	Reasons	Updated By	Override	
09/01/2016		07/19/2016	PASS		PASS				XCTZ62		
08/01/2016	08/31/2016	07/19/2016	PASS		PASS				XCTZ63		
07/01/2016	07/31/2016	07/19/2016	PASS		PASS				XCTZ63		

- b. **Absent Parent page:** The WREA consortium Child Care worker must review the Child Support Information portion of the Caretaker Relative Cooperation Information section to make sure the parent is cooperating with child support. If the parent is not cooperating and the Good Cause Claimed field has a "?," then the Child Care worker must review the Notice of Action Needed to determine how much time the parent has left to either cooperate with child support or file a Good Cause Claim form. The parent is allowed seven (7) business days from the issuance date on the Notice of Action Needed to either cooperate with child support or file a Good Cause Claim form. If it is the eighth business day or later, and the parent has not cooperated with child support nor filed a Good Cause Claim form,

then the Child Care worker needs to change the “?” to a “No” in the Good Cause Claim field. The Child Care worker must then run eligibility to close the Child Care assistance group. If a new authorization must be written for this case, the authorization must be written with an end date that is no greater than the last day of the month that eligibility was run to fail the Child Care assistance group for child support non-cooperation.

Example 2: Tina is not cooperating with child support and did not file a Good Cause Claim form within seven (7) business days. The Child Care worker runs eligibility on October 20, 2016, (eight business days from the issuance date on the Notice of Action Needed, and after the adverse action date in CWW) to end Tina’s Child Care eligibility on November 30, 2016, in CWW. The Confirmed Assistance Group Eligibility History page shows Child Care is failing for reason code 211 as of December 1, 2016. Any new authorizations written for this case must have an end date that is no greater than October 31, 2016, as, per policy, the Child Care assistance group is not eligible for Child Care in November.

Caretaker Relative Cooperation Information	
Effective Period	
* Begin Month:	07 / 2016 Last Updated: 07/19/2016
Caretaker Relative	
* Individual:	[Redacted]
Child Support Information	
* Cooperation:	Yes Non-Cooperation Instance Count: 0
Good Cause Claimed:	[Dropdown]
Good Cause Claim Date:	MM / DD / YYYY
Good Cause Approved:	[Dropdown]
Good Cause Reason:	[Text Field]
Good Cause Result:	[Dropdown]
Medical Support Liability Information	
Cooperation:	[Dropdown]
Good Cause Claimed:	[Dropdown]
Good Cause Claim Date:	MM / DD / YYYY
Good Cause Granted:	[Dropdown]
Good Cause Reason:	[Text Field]
Good Cause Result:	[Dropdown]

2. WREA consortium Child Care workers must appropriately end authorizations in the new EBT CSAW system when the Child Care assistance group is no longer cooperating with child support as follows:
 - a. **092 Alert for Child Support Noncooperation:** If a WREA consortium Child Care worker receives the 092 alert that a parent is not cooperating with child support, then the worker must review the Absent Parent page information in CWW for the case. If the parent is listed as not cooperating and the Good Cause Claimed field has a “?” entered, then the Child Care worker must run eligibility to generate the Notice of Action Needed. The parent is allowed seven (7) business days from the issuance date on the Notice of Action Needed to either cooperate with child support or file a Good Cause Claim form. On the eighth business day after the issuance date on the Notice of Action Needed, if the parent has not cooperated with

child support nor filed a Good Cause Claim form, then the Child Care worker must change the “?” to a “No” in the Good Cause Claim field. The Child Care worker must then run eligibility to close the Child Care assistance group. If eligibility is run after the adverse action date in CWW and the case has current authorizations, then the Child Care worker must go into the new EBT CSAW system to review the authorizations. The end dates of the authorizations cannot be greater than the last day of the month that eligibility was run to fail the Child Care assistance group for child support non-cooperation.

Example 3: Tina is not cooperating with child support and the Child Care worker received the 092 alert on October 9, 2016. The Child Care worker reviewed the information on the Absent Parent page and child support cooperation had been systematically changed to “No” and a “?” was in the Good Cause Claim field. The Child Care worker ran eligibility on the case to send out the Notice of Action Needed. The issuance date on the Notice was October 10, 2016. On October 20, 2016, (eight business days from the issuance date on the Notice of Action Needed, and after the adverse action date in CWW), the parent was still not cooperating with child support and had not filed a Good Cause Claim form, so the Child Care worker ran eligibility that day to end Tina’s Child Care eligibility on November 30, 2016, in CWW. The Confirmed Assistance Group Eligibility History page shows Child Care is failing for reason code 211 as of December 1, 2016. All authorizations must be reviewed. All authorization end dates cannot be greater than October 31, 2016, as, per policy, the Child Care assistance group is not eligible for Child Care in November.

- b. **Email from the Child Support Agency:** If the Child Support agency emails the WREA consortium Child Care worker that a parent on a case is not cooperating with child support, then the Child Care worker must review the Absent Parent page information in CWW. If the parent is still listed as cooperating with child support, then the case must be sent to the Child Care Help Desk (or the Wisconsin Works (W-2) Help Desk if there is W-2 on the case) to change the child support cooperation field to “No” and enter a “?” in the Good Cause Claim field. Once the child support cooperation is changed to “No” and a “?” is entered in the Good Cause Claim field, the Child Care worker must then run eligibility to generate the Notice of Action Needed. The parent is allowed seven (7) business days from the issuance date on the Notice of Action Needed to either cooperate with child support or file a Good Cause Claim form. On the eighth business day after the issuance date on the Notice of Action Needed, if the parent has not cooperated with child support nor filed a Good Cause Claim form, then the Child Care worker must change the “?” to a “No” in the Good Cause Claim field. The Child Care worker must then run eligibility to close the Child Care assistance group. If eligibility is run after the adverse action date in CWW and the case has current authorizations, then the Child Care worker must go into the new EBT CSAW system to review the authorizations. The end dates of the authorizations cannot be greater than the last day of the month that

eligibility was run to fail the Child Care assistance group for child support non-cooperation.

Example 4: Tina is not cooperating with child support and the Child Care worker received an email from the Child Support Agency regarding the parent's failure to cooperate. The Child Care worker contacted the Child Care Help Desk about the parent's failure to cooperate and the Child Care Help Desk worker changed the child support cooperation to "No" and entered a "?" in the Good Cause Claim field. The Child Care worker then ran eligibility on the case to send out the Notice of Action Needed. The issuance date on the Notice was November 11, 2016. On November 23, 2016, (eight business days from the issuance date on the Notice of Action Needed, and after the adverse action date in CWW), the parent was still not cooperating with child support and had not filed a Good Cause Claim form, so the worker ran eligibility that day to end Tina's Child Care eligibility on December 31, 2016, in CWW. The Confirmed Assistance Group Eligibility History page shows Child Care is failing for reason code 211 as of January 1, 2017. All authorizations must be reviewed. All authorization end dates cannot be greater than November 30, 2016, as, per policy, the Child Care assistance group is not eligible for Child Care in December.

- 3. Reports:** To assist the WREA consortium Child Care workers in making sure that new and ongoing authorizations written in the new EBT CSAW system have a correct end date when the Child Care assistance group is no longer cooperating with child support, an excel report will be created by the Department of Children and Families (DCF) each month from September 2016 to January 2017. The monthly reports will be placed under the MyWICChildCare section on SharePoint and under the subsection, "WREA Child Support Report for Phase 1." The reports will be provided at least three (3) business days before the end of the applicable month. The reports will capture all WREA consortium cases where the Child Care assistance group is closing for noncooperation with child support for the current month or a future month. SharePoint can be accessed at the following location:

<https://share.dcf.wisconsin.gov/cca/SiteAssets/home.aspx>

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) 422-7200.

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