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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: 17-29

DATE: ~~06/23/2017~~ **AMENDED**  
**10/10**

Child Care

**SUBJECT: Employment Verification and Child Care Authorizations for New  
Employment when the Employer Uses Equifax/The Work Number**

**CROSS REFERENCE:** Wisconsin Statutes [49.141\(6\)](#) (a) and (b); [49.835](#); [DCF 101.11](#)  
Verification; [Wisconsin Shares Child Care Subsidy Policy Manual 1.3.6 Signature](#)  
[Requirements](#), 1.6.5 Verification Due Date, 1.6.8 Required Agency Assistance, 1.6.11 Approved  
Activity Verification, and 1.6.12 Financial Eligibility Verification, 2.2.3 Authorizations at Initial  
Eligibility, 2.2.13.1 Timely Reported Change, 2.2.13.2 Untimely Reported Change

**EFFECTIVE DATE: July 1, 2017**

**PURPOSE:** This Operations Memo introduces a policy and process change to employment  
and income verification requirements for Wisconsin Shares Child Care Subsidy.

**BACKGROUND:** The department has identified that when employers use Equifax/The Work  
Number it can be a burden for families to obtain income and employment verification. This  
memo provides guidance for situations in which an employer who uses Equifax/The Work  
Number for employment verification purposes refuses to complete the Employment Verification  
Form (EVF-E) and refuses to provide any other form of employment and/or income verification.

Wis. Stat. 49.141(6)(a) prohibits applicants from knowingly and willfully making false statements  
in an application for any benefit or payment; and Wis. Stat. 49.141(6)(b) prohibits applicants  
from concealing or failing to disclose any event affecting eligibility with an intent to fraudulently  
secure a benefit. Further, Wis. Stat. 49.835 states that a person who makes a statement in a  
written application for any aid or benefit is considered to have made an admission as to the  
existence, correctness, or validity of any fact therein. Therefore, for the purposes of the policy

described below, such a statement creates presumptive evidence enough to establish eligibility unless, or until, it is proven false.

***NEW POLICY:***

**1.6.11.1.** When all of the following conditions have been met Child Care eligibility may be determined based on the parent's statement of employment and/or income:

- The parent is newly employed
- The parent's employer uses Equifax/The Work Number for employment verification
- The parent has not yet received any pay stubs
- The employer has refused to complete an EVF-E, send an acceptable letter, or confirm the parent's employment and/or income through collateral contact
- The employment and/or income cannot be confirmed through any data exchange
- The employment and/or income cannot yet be confirmed through Equifax/The Work Number

In situations where all of the above criteria have been met, the parent's word serves as temporary verification of employment and/or income until paystubs or other acceptable written verification is available. ~~A case summary must be generated and parents must sign the case summary to attest to the accuracy and truthfulness of their statements regarding employment.~~

When eligibility is determined under this policy, the worker must continue to require verification and issue a Notice of Verification Required through CARES Worker Web (CWW).

A new case summary and signature are not needed if there is already a signature that satisfies the requirements of Section 1.3.6 Signature Requirements.

***PROCESS:***

If a parent reports that they cannot obtain employment and/or income verification, the local agency is required to assist the parent to obtain the verification (Section 1.6.8 Required Agency Assistance). The agency must attempt to obtain the verification through EVF-E, collateral contact with the employer, data exchanges and the employer's employment verification service, such as Equifax/The Work Number (if available). If the agency cannot obtain the verification, and the criteria above have been met, follow the instructions below depending on whether this is initial eligibility or a case with ongoing eligibility.

***Initial Eligibility and Authorizations***

**Overview of Process if All Requirements are Met**

1. On Employment page in CWW
  - a. Verification for Begin Date = NQ
  - b. Verification for Detailed Wage Information = UA
2. On CC Activity Status page, Activity = Y and Activity Type = EMPL
3. Enter detailed Case Comments
4. IMMEDIATELY go to Employment Page
  - a. Verification for Detailed Wage Information = Q?
5. Complete an Authorization

If a case has not yet been open for eligibility in CWW, EBT CSAW will not allow an authorization to be written. However, if a case falls under this new policy, workers are instructed to work around this by running eligibility, then, if Child Care eligibility was opened (because there are no other pending items), immediately return to the employment page and update the page to pending eligibility for employment verification, then proceed with writing the authorization in EBT CSAW. The authorization should be written with an end date of either the renewal date, or the next expected change, and not limited to one month.

Once a case has been in open status and then returned to pending status, EBT CSAW will allow an authorization to be written, and it is only under this policy that an authorization may be written when eligibility is in pending status.

1. Navigate to the Employment page in CWW.
  - a. If the case meets the policy criteria described above, in the “Employment Description” section of the Employment page leave the Verification type for the Begin Date as “NQ – NOT QUESTIONABLE.” When verification is received, return to this page and change the verification field to reflect the source of the verification (e.g., DE – DATA EXCHANGE, W# - WORK NUMBER, PS- PAY STUBS, etc.).

The screenshot shows the 'Employment Description' form with the following fields:

- Employee Type: [Dropdown]
- Job Title for Health Insurance: [Dropdown]
- Employment Type: R - REGULAR EMPLOYMENT
- Verification: NQ - NOT QUESTIONABLE (highlighted with a red box)
- Begin Date: 07 / 01 / 2017
- Verification: NQ - NOT QUESTIONABLE (highlighted with a red box)
- First Pay Check Date: [MM/DD/YYYY]
- Employment Ended?: No
- Employment End Date: [MM/DD/YYYY]
- Verification: [Dropdown]
- Date Of Last Paycheck: [MM/DD/YYYY]
- Verification: [Dropdown]

- b. In the “Detailed Wage Information” section of the Employment page, change the Verification Type to “UA – UNAVAILABLE”.

The screenshot shows the 'Detailed Wage Information' form with the following fields:

- Pay Frequency: B - BI-WEEKLY
- Rate Per Hour: \$ 8 . 00
- Wage Type: REG - REGULAR PAY
- Average Hours Per Pay Period: 80.00
- Verification: UA - UNAVAILABLE (highlighted with a red box)
- Total Amount Per Pay Period: \$ 640 . 00
- Delete:

2. On the *Child Care Activity Status* page, enter “Y-Yes” for the Activity and “EMPL-EMPLOYMENT” for the Activity Type. ~~Generate a Case Summary and collect a Child Care Signature.~~ Run and confirm Child Care eligibility.

Child Care Activity Status				
Child Care Activity Details				
Individual	*Effective Month	*Activity	Activity Type	Last Updated
TODD BAXTER 37M PP	05 / 2017	Y - Yes	EMPL - EMPLOYMENT	05/15/2017

3. Record Case Comments documenting that the employer uses Equifax/The Work Number and verification is not currently available because the employer refuses to offer any alternative form of verification. The comments must include information on the agency's attempts to obtain verification, and the employment and/or income details that the parent provided, along with the information that eligibility is being determined based on the parent's statement of new employment.
4. If Child Care eligibility opens on the case when eligibility is run in Step 2, on **On** the same day go to the *Employment* page again:
  - a. In the "Detailed Wage Information" section, change the verification type from "UA – Unavailable" to "Q? – QUESTIONABLE NOT YET VERIFIED."

Detailed Wage Information	
Pay Frequency	
* Pay Frequency:	B - BI-WEEKLY
Detailed Wage Information	
Rate Per Hour:	\$ 8 . 00
Average Hours Per Pay Period:	80.00
Total Amount Per Pay Period:	\$ 640 . 00
Wage Type:	REG - REGULAR PAY
Verification:	Q? - QUESTIONABLE NOT YET VERIFIED
Delete:	<input type="checkbox"/>
<input type="button" value="Reset"/> <input type="button" value="Update"/>	

5. If eligibility did not fail when eligibility was run in Step 2, R, run eligibility with dates to pend (or re-pend) the case as of the beginning the first of the month of the new employment and generate a Notice of Proof Needed. If the parent requests an extended due date, the due date may be extended per Section 1.6.5 Verification Due Date.
6. If CC eligibility opened when eligibility was run in Step 2, C, create an authorization in EBT CSAW according to Section 2.2.3 Authorizations at Initial Eligibility. The authorization end date should be the renewal date, or the date of any expected change, whichever is sooner; a shorter authorization must not be written except in cases of varying and on-call employment when the parent has no way to predict their schedule (2.2.8.2). Change the authorization status to "Completed," then calculate benefits. For help with the authorization creation process, changing an authorization's status, and calculating benefits, see the [EBT CSAW Authorizations User Guide](#).
7. If verification is not received by the verification due date, see Section 1.6.5 Verification Due Date. the worker must run to close eligibility. See Operations Memo 17-04 for instruction on running CC eligibility after Adverse Action to close for the next consecutive month.

If verification is received that indicates that the initial information provided was false or incorrect, create a BRITS referral for investigation. Sanctions for providing false information to receive a benefit for which they were ineligible include overpayments and/or Intentional Program

Violations (IPV). Consult with the Bureau of Program Integrity ([dcfbpitarequest@wisconsin.gov](mailto:dcfbpitarequest@wisconsin.gov)) if you have any questions.

### **Ongoing Eligibility and Authorizations**

If Child Care eligibility is open on a case, and then the case is in pending status for any type of verification, EBT CSAW does not prevent an authorization from being written.

When a parent reports new employment, follow current procedure to pend the case for verification. If the parent requests an extended due date, the due date can be extended to no more than 30 calendar days from the date of the change report.

If the new employment is timely reported, and the case meets the requirements under 1.6.11.1, follow Section 2.2.13.1 Timely Reported Change for timely verified changes (remember that the case is still pending for verification, and verification is still due). It is only under this new policy found at 1.6.11.1 that an authorization may be completed when eligibility is in pending status. When creating a new authorization, the authorization end date should be the next renewal date, or the next date of expected change, whichever is sooner; a shorter authorization must not be written except in cases of varying and on-call employment when the parent has no way to predict their schedule (2.2.8.2). Change the new authorization's status to "Completed" and calculate benefits. For help with the authorization creation process, changing an authorization's status, and calculating benefits, see the [EBT CSAW Authorizations User Guide](#).

If the new employment is untimely reported (not reported within 10 calendar days of the employment begin date), and the case meets the requirements under 1.6.11.1, ~~run eligibility to pend, and~~ follow Section 2.2.13.2 Untimely Reported Change for timely verified changes. It is only under policy 1.6.11.1 that an authorization may be completed when eligibility is in pending status.

### **CONTACTS:**

For Wisconsin Shares Child Care policy questions outside of Milwaukee County contact your Bureau of Regional Operations (BRO), Child Care Coordinators at <https://dcf.wisconsin.gov/files/regionaloperations/pdf/bro-contacts.pdf>

For Child Care CARES/CWW, CSAW and CCPI Processing Questions statewide and policy questions in Milwaukee County contact the Child Care Subsidy and Technical Assistance line at: [childcare@wisconsin.gov](mailto:childcare@wisconsin.gov) or (608) 422-7200.

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