

DEPARTMENT OF CHILDREN  
AND FAMILIES  
Secretary Emilie Amundson  
201 East Washington Avenue, Room G200  
P.O. Box 8916  
Madison, WI 53708-8916  
Telephone: 608-422-7000  
Fax: 608-266-6836  
www.dcf.wisconsin.gov



State of Wisconsin  
Governor Tony Evers



TO: **Child Care Eligibility and Authorization Workers  
and Supervisors  
Income Maintenance Supervisors  
Income Maintenance Staff  
Training Staff  
Child Care Coordinators**

**DECE/BPI OPERATIONS MEMO**

**No: 20-04**

**DATE: 02/11/2020**

**Wisconsin Shares Child Care**

FROM: Junior Martin, Director  
Bureau of Program Integrity  
Division of Early Care and Education  
Department of Children and Families

**SUBJECT: Update to Retraction and Voluntary Repayment Agreement  
Procedures**

**CROSS REFERENCE:** [Wisconsin Shares Child Care Policy and Process Handbook:](#)  
Section 4.5.1 Retractions  
Section 4.12.1.1 Voluntary Repayment Agreement (VPA)  
Operations Memo [17-13](#)  
Operations Memo [17-58](#)  
Operations Memo [19-17](#)  
[CSAW Post-Load Benefit Correction \(PLBC\) User Guide](#)

**EFFECTIVE DATE: 03/01/2020**

**PURPOSE:** This Operations Memo provides policy clarification on when retractions and Voluntary Repayment Agreements (VPAs) may be utilized to recover funds. In addition, this Operations Memo also outlines the process that will be utilized to recover funds due to VPA failures. This Operations Memo will replace Operations Memos [17-58](#) and [19-17](#) and combine all retraction and VPA process guidance into one document.

**BACKGROUND:**

Operations Memo [17-13](#) introduced two new methods to recover funds that were either loaded or spent when the parent was not eligible for those funds. These processes are referred to as retractions and VPAs.

Operations Memo [17-58](#) provided updates to the retraction and VPA policies as outlined in Chapter 4 of the Wisconsin Shares Child Care Policy and Process Handbook.

Operations Memo [17-58](#) also provided additional clarification to local agencies regarding the process for submitting these requests to the Bureau of Program Integrity (BPI) for processing.

Operations Memo [19-17](#) provided an update to the VPA process to clarify that a Post Load Benefit Correction (PLBC) request was no longer necessary to complete a VPA.

This Operations Memo provides additional updates to the retraction and VPA processes, along with introducing the process for how the Department will handle VPA failures.

**POLICY:**

*Chapter 4.5.1 Retractions*

Funds may be retracted (removed) from a parent's MyWICChildCare EBT card in limited circumstances. Examples of situations when funds may be removed include:

- Funds loaded (but not spent) to an incorrect provider or an incorrect provider location
- Provider closures of more than one (1) week in a calendar year, temporary closure, or permanent closure
- Cases of agency error (if the parent was not eligible for the amount of subsidy received)
- Parent ineligible for funds (such as)
  - Not participating in an approved activity (including ACTS and TBRK)
  - Income change that exceeds the eligibility limit
  - Change in Assistance Group (AG) if the change affects eligibility or the authorization
  - Non-cooperation with Child Support Agency (CSA)
- Cases of hardship where it is possible to calculate a removal amount for the time period when the child is not attending the provider location
- History of expungements
- Midmonth change in provider, if funds are remaining on the card and the child will no longer be attending, the funds to the previous provider should be retracted for future dates
  - If funds have been paid then a provider overpayment should be established after provider explanation

All funds must be retracted from the parent's EBT card if the parent has not paid any of the subsidy to the provider within the previous 90 days.

Other instances may be approved by BPI for removal if sufficient reason is provided to demonstrate that leaving the funds on the card may result in an overpayment due to client error.

If funds are not approved for removal it is either because the parent is eligible to spend the funds or BPI anticipates that the funds will be expunged from the card within 90 days. If a retraction request is denied by BPI and the client spends the funds after the denied request, local agencies must not create an overpayment without first consulting BPI via the Technical Assistance Mailbox.

#### *Chapter 4.12.1.1 Voluntary Repayment Agreement (VPA)*

The Voluntary Repayment process occurs when a provider agrees to return funds to the Wisconsin Shares Program. The VPA may be utilized in limited circumstances, where it has been demonstrated that the parent was ineligible for the funds received, or the provider received funds in error. The VPA may only be utilized when the ineligible funds were paid to the provider. Examples in which EBT funds may be recovered via a VPA include, but are not limited to, the following:

- Payments were made to an incorrectly authorized provider
- Cases of agency error that resulted in the parent receiving more funds than they were eligible for and paying the provider with those additional funds
- System error (such as the parent's card incorrectly received a benefit load twice in one month)
- Parent failed to timely report a provider discount price
- Provider has indicated that they would like to return funds and has provided an acceptable reason
- Child not attending the facility (such as non-attendance, child being expelled, etc.)

If the provider agrees to the Voluntary Repayment, the provider must complete the Voluntary Repayment Agreement form ([DCF-F-5178-E](#)) and return it to the local agency. The form may be mailed to the provider, and returned via email, scan or fax. The Department will then contact Fidelity Information Services (FIS) to initiate the Voluntary Repayment process. The funds will be debited from the providers bank account registered with FIS and returned to the state. It is vital that the funds are in the account when the debit is processed. If funds are not available, the Department will receive a failure notice.

In the event that a VPA transaction is not successfully completed, BPI will send a VPA failure notice to the provider with information on how to repay the funds to the Department. See the section below titled Voluntary Repayment Agreement Failure Procedure for more information regarding VPA Failures.

Local agencies are responsible for tracking situations that may require a VPA and for processing an overpayment for the parent if the VPA is not returned within the 30-day timeframe. The 30-day timeframe begins the day that the VPA is sent to the provider. If a provider would like to submit a manual check rather than use the Voluntary Repayment process, they may do so.

VPAs may not be utilized to return funds for an **established provider overpayment**. If a provider overpayment was already established in CSAW and the overpayment letter has been mailed, then a VPA cannot be used to repay that overpayment. For information on provider overpayments see [Wisconsin Shares Child Care Policy and Process Handbook](#) Section 4.11.1.

#### ***PROCEDURE:***

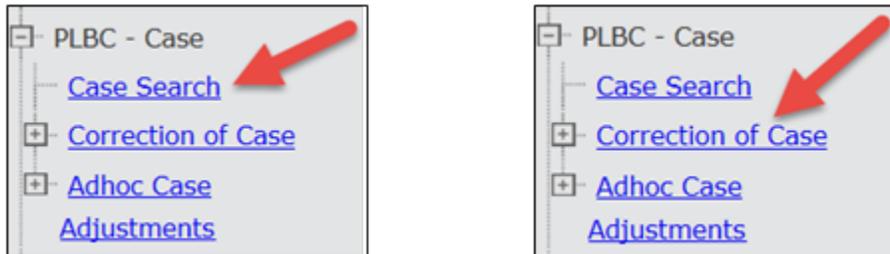
##### ***Retraction Procedure***

##### ***STEP 1: Complete a Post Load Benefit Correction (PLBC)***

The Case Post Load Benefit Correction (PLBC) must be completed and confirmed using the appropriate reason codes. Please see Creating a New Case PLBC

Request in the [PLBC User Guide](#) for instructions on how to locate the case in PLBC. Follow the steps below to complete the PLBC entries. A PLBC will need to be completed for each month and for each child that funds need to be removed from.

Under the PLBC – Case header in the left-hand navigation menu in EBT CSAW, select the Case Search link and search by case number. If you have already searched for the case in question, select Correction of Case.



Select the New Correction link from the bottom of the Correction of Case page to initiate a new PLBC request. Enter all required details into the New Correction – Case Attributes page (reference the [PLBC User Guide](#) for assistance with completing this page). Be sure to document the circumstance surrounding the adjustment in the Comments box, then click the Modify button. This will bring the user back to the Correction of Case page.

**Modify Correction - Case Attributes**

**Benefit Month** December 2016

**Status** In Progress

**Error Source \*** Client Error

**Responsible Party Indicator \*** Client

**Reason \*** Authorization Error

**Secondary Reason**

**Comments**  
 The correction to the authorization was previously done incorrectly. Another PLBC needs to be entered to correct that the average weekly hours should have been reduced from 10:04 to 7 hours instead of 5 hours.  
 216 of 500 characters.

**Modify >**

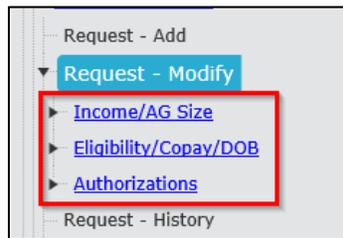
On the Correction of Case page, select the pencil icon for the benefit month that needs to be corrected. This will bring you to the Modify Correction – Case Attributes page.

**List of Corrections - Case Attributes**

Benefit Month	Error Source	Reasons	Requested Date	Status	Corrections		
May 2017	Client Error	Authorized To Wrong Provider	07/25/2017	Processed	<a href="#">Authorization</a> <a href="#">Eligibility/Copay/DOB</a>	<a href="#">Benefit Changes</a>	
March 2017	Client Error	Authorized To Wrong Provider	03/30/2017	Processed	<a href="#">Authorization</a>	<a href="#">Benefit Changes</a>	
March 2017	Client Error	Authorization Error	06/19/2017	In Progress	<a href="#">Authorization</a>		

Select the appropriate modification link from the left-hand navigation menu to make the necessary change to the authorization information. In most cases, this will be the Authorization link, however there may be situations where you need to edit the AG Size,

Income Information, Eligibility, or other information. For more information about the modification options in Case PLBC and the functionality of each, see the [PLBC User Guide](#).



From the chosen modification page, select the link on the child's name for each child who needs to have funds retracted from the card. If you are editing the Income or AG size for the case, you will not need to select the child's name as this type of change will impact all children on the case.

List of Authorizations for Initial benefit in March, 2017							
Child's Name	Date of Birth	Effective Authorization Period	Average Weekly Hours	Average Weekly Full Time Hours	Average Weekly Above Full Time Hours	Provider Location Details	
Miles Sauer	02/24/2012	03/01/2017 - 03/31/2017	00:00	00:00	00:00	3800036563-001 Randy's Group Care 205 Corporate Dr, Madison, WI 53714-2408	

Each of the scenarios described below are edited on the child's authorization page in CSAW.

- Funds loaded, but not spent, to an incorrect provider or provider location
  - Select the Authorization modification link and change the “Is this authorization invalid for this month” option from “No” to “Yes” for each child
- Provider closures of more than one (1) week in a calendar year, temporary closure, or permanent closure
  - Select the Authorization modification link and change the begin and/or end dates of the authorization to reflect the dates that the provider was open and eligible to provide care
    - Example: A provider's license is revoked on 08/11/2019. The authorization was in place from 08/01/2019 – 08/31/2019. The end date of the authorization would be changed to 08/11/2019. The begin date would stay the same.
  - If the client should not have been authorized for the month due to the provider being closed for the entire month, select the Authorization modification link and change the “Is this authorization invalid for this month” option from “No” to “Yes”
- Cases of agency error (if the parent was not eligible for the amount of subsidy received)
  - Select the Authorization modification link. Edit the authorization hours and/or the authorization begin/end dates so that the client is authorized for the correct number of hours and days

- For more information regarding editing the number of authorized hours, including the Two/Four Week Schedule option, see the [PLBC User Guide](#)
- Child ineligible for funds
  - If the child was ineligible for the entire month, select the Eligibility/Copay/DOB modification link and change the Eligibility Switch option for each child impacted from “Yes” to “No”
  - If the child was ineligible for only part of the month, select the Authorization modification link. Edit the authorization hours and/or the authorization begin/end dates so that the client is authorized for the correct number of hours and days
- Cases of hardship where it is possible to calculate a removal amount for the time period when the child is not attending the provider location
  - Select the Authorization modification link. Edit the authorization hours and/or the authorization begin/end dates so that the client is authorized for the correct number of hours and days
- Child not attending the provider location
  - If the child did not attend for the entire month, select the Authorization modification link and change the “Is this authorization invalid for this month” option from “No” to “Yes”
- History of expungements
  - The department may retract all child care subsidy funds in the client’s account if the parent has not paid any of the child care subsidy to the provider within the previous 90 days.
  - In these cases, create a PLBC for each month where subsidy funds remain on the card. For each month, select the Authorization modification link and change the “Is this authorization invalid for the month” option from “No” to “Yes”
- Mid-month change in provider, if funds are remaining on the card and the child will no longer be attending
  - Select the Authorization modification link. Edit the authorization hours and/or the authorization begin/end dates so that the client is authorized for the correct number of hours and days

Next, select “Calculate” from the left-hand navigation menu. This will take you to the Benefit Change Details for the case that will show you the changes that have been calculated for each child that has an authorization for the month in question. Below is a description of the fields on this page and what they mean:

- **Previous Benefit:** This is the value of the subsidy assigned to the child prior to the PLBC being completed. Usually, this will be the value of the subsidy load that was given to the child for the month. However, if another PLBC request was completed for the month in question, it will display the subsidy amount calculated by the previous PLBC.
- **Current Benefit:** This is the amount of subsidy funds that the child would receive for the month based on the changes that were entered. This shows how much

funds each child should have received if all of the corrected information was entered for the case prior to the benefit load occurring.

- **Calculated Change:** This value is the difference between the Previous Benefit and the Current Benefit. The Calculated Change will be the retraction amount for each child for the case.
  - If the Calculated Change is negative, it will appear in parenthesis. If the calculated change is not in parenthesis, this means that this PLBC determined the client was eligible for additional subsidy funds for the month.
  - If the value is negative, then BPI can complete a retraction request for the amount listed. BPI will not be able to complete a Retraction Request for a positive change.
- **Remaining Balance:** This value shows how much subsidy remains on the card for the month that you completed the retraction request for. A retraction request can only be completed for a value less than or equal to the remaining balance for each month.
- **“Apply To” Value:** The Apply To value indicates which party is responsible for the change. The actions below only occur once a PLBC is processed, so the Apply To values can be changed anytime the PLBC is in an unprocessed status. Below is a breakdown of how the Apply To values function:
  - **Negative Calculated Change - Apply to Family:** An overpayment (OP) is created for the client in EBT CSAW. If a Retraction request is completed, the OP amount in the system will be verified against the retraction amount and the OP will be zeroed out in the system. This negative change will need to be calculated prior to a retraction request being completed.
  - **Positive Calculated Change - Apply to Family:** The amount will be added to the client’s EBT Card overnight.
  - **Negative Calculated Change – Apply to Provider:** An overpayment (OP) is created for the Provider in EBT CSAW.
  - **Positive Calculated Change - Apply to Provider:** No change will happen to the subsidy amount and no overpayment will be created. PLBC will not load funds directly to a provider’s account.
  - **Do Not Apply:** Any value that is coded as Do Not Apply (or similar Apply To values, such as Not Applied due to Negative Amount or Not Applied due to Cutoff) will have no impact on the case; regardless if the Calculate Change was positive or negative.

**NOTE:** Apply To values are systematically determined and cannot be changed by local agency workers. If all parts of the PLBC were completed correctly, and a change needs to be made to the Apply To value, contact BPI via the Technical Assistance Mailbox ([DCFBPITARquest@wisconsin.gov](mailto:DCFBPITARquest@wisconsin.gov))

If at any point, an edit or change needs to be made to the correction details that were entered, you can select Reset Calculation from the left-hand navigation menu. This will change the PLBC back to In Progress status and you can make additional changes to the case.

**EBT CSAW Menu**

- Home
- Dashboard
- Assignments Search
- Inbox Search
- EBT Case
- EBT Provider
- PLBC - Case
  - Case Search
  - Correction of Case
    - Request - Add
    - Request - Modify
    - Request - History
    - Request - Delete
    - Calculate
    - Reset calculation**
    - Benefit Changes
  - Offset Changes
  - Benefit Comparison
- Adhoc Case Adjustments
- Benefit Return
- PLBC - Provider
  - Case Overpayments
  - Provider Overpayments
- Pending Authorizations
- Refer To Finance
- Program Integrity CMS

**Calculation Correction And Confirm Benefit Changes By Case**

**Case Details**

Case Number: 3800036563  
 Primary Person: Randy's Group Care  
 Address: 205 Corporate, Madison, WI 53714-2408, Dane County  
 Admin Agency: Dane County (13)  
 RFA Date: 05/05/2016  
 Review Date: N/A  
 CC AG Status: Closed

**There are 34 Unprocessed Tasks. Click here to view Unprocessed Tasks**

**Correction Request Details**

Benefit Month: December 2016  
 Reasons: Correction To Plbc Subsidy Adjustment, Authorization Error  
 Correction Type: Client Error  
 Correction Status: Calculated  
 Requested Date: 04/27/2017

Click the Excel icon above to download the data in Excel format.

**Benefit Change Details**

Child's Name	Date of Birth	Provider Details	Previous Benefit	Current Benefit	Calculated Change	Remaining Balance	
Chloe (Sage)	05/05/2016	3800036563-001 Randy's Group Care 205 Corporate, Madison, WI 53714-2408	\$149.66	\$210.43	\$60.77	\$0.00	Apply To Family
Oliver (Sage)	05/05/2016	3800036563-001 Randy's Group Care 205 Corporate, Madison, WI 53714-2408	\$98.04	\$51.60	(\$46.44)	\$0.00	Apply To Family

**Confirm Benefit**

Once you have reviewed all information on this page and made any necessary changes, select Confirm Benefit from the bottom of the page. This will change the status of the PLBC request to Confirmed and the PLBC will process overnight. Once the PLBC is processed, BPI can complete the Retraction request.

If a new authorization is needed, do not create the new authorization until the PLBC is in confirmed status. This ensures that the copayment calculation will be correct on the new authorization.

### STEP 2: Notify the Client

Inform the parent that a notice will be sent to them regarding the correction. The notice will inform them that they will be receiving a Repayment Agreement in the mail. Inform the parent that this is incorrect, because the funds are being removed from their card instead of establishing an overpayment.

### STEP 3: Submit the Retraction Request to the Bureau of Program Integrity (BPI)

Contact the BPI Technical Assistance Mailbox either by email at [DCFBPITARrequest@wisconsin.gov](mailto:DCFBPITARrequest@wisconsin.gov) or by using the Web Submission Form located here: <https://dcf.wisconsin.gov/progintegrity/bpi-technical-assistance-form>

The following information must be included in your request, preferably in the format shown below:

- 10 Digit Case Number
- Child or Children's Names
- Removal Amounts for Each Child
- Impacted Provider Number and Location Number
- Benefit Month

- Brief Reason Description

BPI requests that this information be submitted in this fashion due to the large number of retraction requests that BPI receives every day. Formatting the request this way will help decrease processing time with the intake and completion of these requests.

#### *STEP 4: Processing the Retraction*

BPI will process the retraction request. Once BPI has completed the retraction request, the agency worker who submitted the request will receive an email confirmation stating that the funds have been removed. If BPI is not able to remove the full amount of funds that were requested, then you will be informed of the total amount that was removed. If there were not funds remaining on the card, BPI will inform you that the retraction request could not be completed due to insufficient funds.

### ***Voluntary Repayment Agreement (VPA) Procedure***

#### *STEP 1: Determining the VPA Amount*

If the local agency needs to determine the amount of funds that should be recovered for the VPA, complete a Case Post Load Benefit Correction (PLBC) request following the instructions listed in the [PLBC User Guide](#). This calculation is only required to determine the appropriate amount of funds that need to be recovered from the provider.

Once the calculation has been completed and the adjustment amount has been added to the VPA form, the local agency must delete the PLBC request from EBT CSAW.

**NOTE:** If the provider has already stated the amount of funds that they wish to return to the Department, there is no need to create a Case PLBC request to calculate the VPA amount. **BPI no longer needs a completed Case PLBC to process a VPA.**

#### *STEP 2: Discuss VPA with the Provider*

The local agency must contact the child care provider that was incorrectly paid and discuss the error. The agency worker must ask the child care provider if they are willing to voluntarily return the funds. The agency worker must also explain that if the provider agrees to return the funds, the funds will be withdrawn from the bank account that is on file with FIS.

**NOTE:** Providers have the option to submit a payment for a VPA via check. If the provider would like to submit a check for the repayment of a VPA, then see the section in this Operations Memo titled Voluntary Repayment Agreement (VPA) Procedure When a Provider Submits a Check to the Agency.

If the provider agrees to the voluntary repayment, the local agency must fill out the VPA form ([DCF-F-5178-E](#)) with the available information and send the form to the child care provider for completion and signature. Any person associated with the child care provider who has the legal authority to enter into an agreement can complete and sign the form. The provider must return the form to the local agency within 30 calendar days. If the provider does not return the form within 30 calendar days, the local agency should review the situation surrounding the VPA and determine if a client overpayment should be established. If so, the local agency should establish a client overpayment for the amount that is owed.

It is acceptable for a provider to return a portion of the funds instead of the calculated amount. Document the amount the provider would like to return on the VPA form and submit the request to BPI. Then, review the situation surrounding the VPA and determine if a client overpayment should be established. If so, the local agency should establish a client overpayment for the difference between the VPA amount and the calculated overpayment.

Once the provider returns the signed VPA form, the local agency must review the document to ensure that all fields have been completed. In order for BPI to process the VPA request, all six fields at the top of the form must be completed (Child Name, Case Number, Provider Number, Date of Inaccurate Issuance, Amount Received, and FIS Provider ID). In addition, the provider must indicate a reason for returning the funds on the form, include their contact information, and provide a signature approving the transaction. Lastly, the provider must check "Yes" for all three statements that are listed under the Instructions header if they plan on returning the money electronically via their bank account on file with FIS. If they would like to return the funds via check, see the section of this Operations Memo titled Voluntary Repayment Agreement (VPA) Procedure When a Provider Submits a Check to the Agency.

If any of these fields are not completed, BPI will not be able to process the VPA request. The local agency will need to contact the provider to have them complete the sections of the form that they missed prior to submission of the request to BPI.

#### *STEP 3: Submitting the VPA Request to the Bureau of Program Integrity (BPI)*

The local agency must contact the Bureau of Program Integrity's Technical Assistance Mailbox via email at [DCFBPITARquest@wisconsin.gov](mailto:DCFBPITARquest@wisconsin.gov) or by using the Web Submission Form located here: <https://dcf.wisconsin.gov/progintegrity/bpi-technical-assistance-form>

Include the completed VPA form and the following information in your email request, preferably in the format shown below:

- 10-Digit Case Number
- Child or Children's Names
- Removal Amounts for Each Child
- Impacted Provider Number and Location Number
- Benefit Month
- Brief Reason Description

BPI requests that this information be submitted in this fashion due to the large number of VPA request that BPI receives every day. Formatting the request this way will help expedite the processing of the request.

#### *STEP 4: Processing the VPA*

BPI will process the VPA. Any PLBC requests created for the purposes of calculating an amount for the VPA must be deleted by the local agency. The local agency must not leave a PLBC request in CSAW when submitting a VPA request. Once the VPA request is completed, the local agency worker who submitted the VPA will receive a confirmation email stating that the request has been completed.

## ***Voluntary Repayment Agreement (VPA) Procedure for when a Provider Submits a Check to the Agency***

### ***STEP 1: Discuss the VPA with the Provider***

The local agency must contact the child care provider that was incorrectly paid and discuss the error. The agency worker must confirm with the child care provider that they are willing to voluntarily return the funds.

If the provider agrees to the voluntary repayment, the local agency must fill out the VPA form ([DCF-F-5178-E](#)) with the available information and send the form to the child care provider for completion and signature, if the VPA form has not been completed already. Any person associated with the child care provider who has the legal authority to enter into an agreement can complete and sign the form. The provider must return the form to the local agency within 30 calendar days. If the provider does not return the form within 30 calendar days, the local agency should review the situation surrounding the VPA and determine if a client overpayment should be established. If so, the local agency should establish a client overpayment for the amount that is owed.

Once the provider returns the VPA, the local agency must review the document to ensure that all fields have been completed. In order for BPI to process the VPA request, all six fields at the top of the form must be completed (Child Name, Case Number, Provider Number, Date of Inaccurate Issuance, Amount Received, and FIS Provider ID). In addition, the provider must indicate a reason for returning the funds on the form and include their contact information.

Because the provider is submitting a check for the repayment of the funds, they **do not** need to check “Yes” for all three statements that are listed under the Instructions. They will need to check the second and third boxes as “Yes”; however, since the funds will not be removed from the bank account on file with FIS they can indicate “No” for the first statement.

If any of these fields are not completed, BPI will not be able to process the VPA request. The local agency will need to contact the provider to have them complete the sections on the form that were incomplete prior to submission of the request to BPI.

### ***STEP 2: Submitting the VPA Request to the Bureau of Program Integrity (BPI)***

Once the local agency has received the check and the VPA form, the agency worker can mail the request to BPI for processing. Send the VPA form and the check to BPI at the address listed below:

<p>Bureau of Program Integrity Attention: Operations Program Associate 201 E. Washington Ave., C. 200 Madison, WI 53708-8916</p>
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### ***STEP 3: Processing the VPA***

BPI will process the VPA. Once the VPA request is completed, the local agency worker who submitted the VPA will receive a confirmation email stating that the request has been completed.

### ***Voluntary Repayment Agreement (VPA) Failure Procedure***

Occasionally, a VPA will fail for certain reasons. Those reasons can include, but are not limited to, insufficient funds or the provider not having a bank account that is able to be debited on file with FIS.

When a VPA fails, the provider is considered liable to return the amount listed on the VPA form to the Department. BPI has implemented a new VPA failure process in order to collect these funds. The local agency will not be expected to complete any part of this process; however, the following information regarding the VPA failure process can be helpful to know when discussing VPAs with the provider.

Once a month, BPI will run a report to determine if there were any VPA failures that have occurred. Once BPI has determined which VPAs have failed, they will send the provider a VPA Failure letter outlining what occurred and the next steps for recovering the funds. The letter will state the following:

- Amount that must be returned to the Department
- Date the VPA was submitted to the Department
- Information on the repayment process, including how to submit a payment

The amount that needs to be returned to the Department will be slightly higher than the original VPA amount to account for the additional \$0.50 fee that will be added as the result of the VPA failure. This is listed on the VPA form as part of the statements the provider agreed to upon submitting the VPA.

The letter will also let the provider know that they have an option to submit a check to the Department for the amount listed on the letter. The provider will have 30 calendar days from the mailing date of the letter to submit a check before the VPA amount is submitted to the Department's Bureau of Finance for processing.

Once the debt is submitted to the Bureau of Finance, the VPA amount will be treated the same way as a traditional overpayment. The provider will have an option to enter into a Repayment Agreement with the Department where they can pay back a set portion of the funds over time until the debt has been paid in full.

If a provider fails to return a Repayment Agreement (RPA), fails to pay the overpayment in full or to make a payment equal to the monthly amount agreed upon in the RPA, they will receive a Dunning Notice. A Dunning Notice is a past due notice that informs the provider that they are required to pay the balance of the debt and that failure to complete and return a repayment agreement could result in delinquency and further collection action.

If a provider receives three (3) Dunning Notices over the life of the debt, he/she is determined to be delinquent and the debt is referred for additional collection action including levy, warrant/lien and Department of Revenue (DOR) state tax intercept.

If a provider is delinquent on a current CC overpayment, and receives another overpayment, the second overpayment is automatically considered delinquent, without the client receiving any additional Dunning Notices.

**CONTACTS:**

For investigation, overpayment, and Program Integrity internal procedure development questions; written resource and subject matter expert requests; and Voluntary Repayment Agreements and Retractions, please contact the Bureau of Program Integrity (BPI) at: [DCFBPITArequest@wisconsin.gov](mailto:DCFBPITArequest@wisconsin.gov) or the [Technical Assistance Request Page](#) on the DCF Website.

For Wisconsin Shares Child Care Chapter 3 and 4 policy questions outside of Milwaukee County contact the Bureau of Regional Operations (BRO) Child Care Policy Help Desk at [BROCCPolicyHelpDesk@wisconsin.gov](mailto:BROCCPolicyHelpDesk@wisconsin.gov).

For referrals regarding alleged client or provider child care fraud or other program integrity concerns, please submit a referral to the Child Care Fraud Mailbox at [DCFMBCHILDCAREFRAUD@wisconsin.gov](mailto:DCFMBCHILDCAREFRAUD@wisconsin.gov).

DCF/DECE/BPI/MKH