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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/BELP OPERATIONS MEMO

No: 19-10

DATE: 02/28/2019

Wisconsin Shares Child Care

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

SUBJECT: System Enhancements to Support Wisconsin Shares Applicants in Doubled Up Housing

CROSS REFERENCE: Wisconsin Shares Child Care Policy and Process Handbook Definition of "Homeless," 1.3.1 Assistance Groups (AG), 1.3.4 Wisconsin Residency, 1.5.10 Non-Financial Eligibility Verification, 2.3.3 Authorizations for Children Who Live with a Child Care Provider; 42 U.S.C. 11434a

EFFECTIVE DATE: March 2, 2019

PURPOSE: The purpose of this Operations Memo is to inform Wisconsin Shares Child Care Subsidy agencies about system enhancements and a new process to support families living in doubled up housing due to loss of housing, economic hardship, or a similar reason. CARES Worker Web (CWW) has been modified to ensure that those who apply for Wisconsin Shares and are sharing housing with others due to a loss of housing, economic hardship, or similar reason will not fail Wisconsin Shares eligibility for lack of address verification.

BACKGROUND: Wisconsin Shares received reports of an increasing number of applicants who are unable to provide verification of their address because they live in doubled up housing. These applicants have been found to be ineligible for Wisconsin Shares for lack of address verification.

The Department determined that it is allowable to exempt certain parents from address verification in some situations. System enhancements will be made so that applicants who meet the definition of homeless for Wisconsin Shares will not be required to verify their address.

POLICY: Note that the change described in this operations memo is for **the Wisconsin Shares Child Care Subsidy program only**. Workers should continue to follow current living arrangement, residency, and address verification policies and processes for other programs (such as FoodShare, BadgerCare Plus, Medicaid, and Wisconsin Works (W-2)).

Wisconsin Shares has adopted the McKinney-Vento Homeless Assistance Act, Subtitle VII-B, definition of homeless [42 U.S.C. 11434a(2)]. According to this definition, the term "homeless" is defined as individuals who lack a fixed, regular, and adequate nighttime residence. This includes those who: are sharing the housing of other persons due to loss of housing, economic hardship, or a similar reason; are living in motels, hotels, trailer parks, or camping grounds due to the lack of alternative adequate accommodations; are living in emergency or transitional shelters; or abandoned in hospitals; have a primary nighttime residence that is a public or private place not designed for or ordinarily used as a regular sleeping accommodation for human beings; are living in cars, parks, public spaces, abandoned buildings, substandard housing, bus or train stations, or similar settings.

Wisconsin Shares considers an Assistance Group (AG) to be in "doubled up" housing if that assistance group was unable to maintain their independent housing situation, and therefore are forced to share housing with one or more adults who are not in the assistance group such as extended family, friends, or other non-relatives. When the AG is living "doubled up" due to loss of housing (for example, they were evicted from their previous residence), economic hardship (for example, they could not afford suitable housing on their own), or a similar reason, address verification is not required for the purposes of Wisconsin Shares eligibility.

Living with a person who should be included in the AG, such as a spouse or non-marital coparent, is not considered "doubled up." For more information about who should be included in an AG, see the Wisconsin Shares Child Care Policy and Process Handbook, Section 1.3.1.

Keep in mind that no child may receive a Wisconsin Shares authorization to a child care provider who they live with (see the Wisconsin Shares Child Care Policy and Process Handbook, Section 2.3.3). This policy also applies to children who share the provider's housing in a doubled up living arrangement.

PROCESS: The changes described in this Operations Memo are for **the Wisconsin Shares Child Care Subsidy program only**. Different programs may have different policy on if and when doubled up living situations are considered to be homelessness. Workers should continue to follow current living arrangement, residency, and address verification policies and processes for other programs (such as FoodShare, BadgerCare Plus, Medicaid, and W-2).

A new verification code has been added to the Address Verification field on the General Case Information page in CWW. This new verification code is "DB-Doubled Up Housing."

If a parent reports that they are not able to provide address verification, the worker must speak with the parent and ask them about their living situation. If they are living in doubled up housing*, the worker must ask if the person they are sharing housing with is a spouse or non-marital co-parent. If the person they are sharing housing with is a spouse or non-marital co-parent, that person must be included in the AG and that household is not considered to be doubled up.

If the parent is living in doubled up housing with someone outside of the correct AG, the worker must ask if the parent is living in doubled up housing due to a loss of housing, economic

hardship or a similar reason. The worker's next steps depend on how the parent answers this question.

- Yes: If the parent indicates their doubled up housing situation is due to one of these reasons, address verification is not required for Child Care eligibility and the worker must enter "DB Doubled Up Housing" in the *Address* verification field on the *General Case Information* page in CWW.
- No: If the parent indicates their housing situation is not due to one of these reasons, address verification is required for Child Care eligibility and the worker should proceed as usual.

* The term "doubled up housing" may be unfamiliar to the parent. They may also refer to it as shared housing, crashing at someone else's home or apartment, or couch surfing.

Household Address			Find Matching Cases						
*County of Residence: Populate with office address (for homeless Primary Persons)									
Number Unit	Direction *St / Rural Rt / Box Number	Suffix	Quadrant Apt						
Additional Address Info									
*City	*State	*ZIP	Phone						
MADISON	WI - WISCONSIN 🗸 🔚	53714 -							
W-2 Geographical Area Override W-2 Geographical Area									
*Address Verification Post Office Suggested Address Verification									
DB - DOUBLED UP HC	• •								

The worker must ask the parent if members of the AG reside in Wisconsin, and if they intend to continue residing in Wisconsin, and record the parent's answers on the *Current Demographics* pages in CWW for each member of the Child Care AG.

If the parent is only applying for Wisconsin Shares Child Care, and is not open for any other programs (such as FoodShare, BadgerCare Plus, Medicaid, or W-2), the worker must enter "NQ – Not Questionable" in the verification field for the *Resides in WI* question on the *Current Demographics* pages in CWW.

III Current Demograph	ics				Cancel	Reset			
5 1				_		Total: 2			
Individual Demographic Information									
Effective Period									
* Begin Month: 03 /	2019	Last Updat	ted:	11/29/2018					
Individual Details									
* Individual:									
Identity Verification:	DR - DRIVER'S LICENSE		▼						
Identity MA Verification:			▼ 1						
SSN Cooperation:	Yes 🗸								
Marital Status:	SE - SEPARATED	▼	Verification:	NQ - NOT QUESTIONABLE		v 1			
* Resides In WI:	Yes 🗸		* Verification:	NQ - NOT QUESTIONABLE		~ 1			
* Intent To Reside In WI:	Yes 🗸								
* Migrant Farm Worker:	No 🗸		Verification:	NQ - NOT QUESTIONABLE		~ 1			
* Special Needs Child:	No 🗸		Verification:			▼			
* Fleeing Felon Or In Violation Of Probation / Parole:	No 🗸		Source:		[▼ ∎			

If the *Address Verification* value is "DB - Doubled Up Housing," CWW will not fail Child Care eligibility for any failing value in the *Resides in Wisconsin* verification field. If the worker enters a pending code ("?", "Q?" or "PN") for *Resides in Wisconsin* verification, Child Care eligibility will pend along with any other program that requires Wisconsin residency.

Living in doubled up housing is not, in itself, a reason to find Wisconsin residency questionable.

CONTACTS:

For Wisconsin Shares Child Care policy questions outside of Milwaukee County contact your Bureau of Regional Operations (BRO), Child Care Coordinators at BROCCPolicyHelpDesk@wisconsin.gov.

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

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