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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: 19-11**

**DATE: 03/06/2019**

**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: Limited Early Renewals for Wisconsin Shares Child Care**

**CROSS REFERENCE:** [Wisconsin Shares Child Care Policy and Process Handbook](#)  
Section 1.8.3.1

**EFFECTIVE DATE:** March 6, 2019

**PURPOSE:** This Operations Memo informs local agency workers of policy and procedures for new limitations when processing early annual renewals for Wisconsin Shares Child Care.

**BACKGROUND:** The Child Care and Development Block Grant (CCDBG) Act of 2014 requires states to create family friendly policies that help families maintain Wisconsin Shares Child Care subsidy and support continuity of care for children. In November 2018, the Department of Children and Families (DCF) released new policy limiting early renewals in order to promote 12 month eligibility periods. 12 month eligibility periods allow families the opportunity to have longer authorizations and more stable subsidy amounts, as well as helping families gain financial stability by not increasing the family's copayment when income increases if the family is below 190% of the Federal Poverty Level (FPL). The early renewals policy has been further revised to support 12 month eligibility periods and family stability.

**POLICY:** The following policy will be added to the Wisconsin Shares Child Care Policy and Process Handbook with the next release. An early renewal is defined as an eligibility renewal that is initiated and confirmed prior to Adverse Action in the 11th month of the 12 month eligibility period.

**Note:** A renewal is considered timely (not early or late) when it is completed (including the interview, verification, and confirmation) between Adverse Action in the month prior to the renewal due date and the renewal due date (located on the Override AG Renewal/Review Dates page in CWW).

### 1.8.3.1 Early Renewals

The eligibility period between renewals is 12 months. The parent may only complete an early renewal if he or she has stated his or her consent to complete an early renewal and the renewal month of the Income Maintenance (IM) program is no more than one (1) month prior to the current Wisconsin Shares Child Care renewal date on the Override AG Renewal/Review Dates page in CWW.

Workers must inform parents of the potential consequences of the early renewal. These consequences include:

- The current household income being used to determine the family's copayment,
- The potential for the family to move to a different copayment period a month earlier than if the parent did not complete an early renewal (see Wisconsin Shares Child Care Policy and Process Handbook section 2.5.3) and
- The potential of reducing the Wisconsin Shares Child Care subsidy amount a month earlier than if the parent did not complete an early renewal.
- A new authorization assessment being completed in CSAW, at which time authorized hours could be reduced (see Wisconsin Shares Child Care Policy and Process Handbook section 2.4.2).

The worker will not be able to reset the eligibility period back to the previous eligibility period or copayment period once an early renewal has been completed. CWW will set the next renewal date 12 months from the month the early renewal is confirmed, which shortens the current eligibility period by one month.

### **PROCESS:**

When Wisconsin Shares Child Care is the only program open on the case, or when no other Income Maintenance assistance program is due for a timely renewal, CARES Worker Web (CWW) will prevent the worker from initiating an early eligibility renewal prior to the 11<sup>th</sup> month of eligibility. ACCESS will prevent the parent from initiating an early renewal prior to the first business day following the second Saturday of the 11<sup>th</sup> month of eligibility. Workers must not update renewal dates for Child Care or other programs in CWW for the sole reason of allowing an early Wisconsin Shares Child Care renewal

Agency workers can initiate an early child care renewal in CWW as early as the first business day of the 11<sup>th</sup> month prior to the Child Care renewal month. When the agency worker attempts to initiate an early Child Care renewal in CWW prior to Adverse Action of the 11<sup>th</sup> month, a soft stop yellow message will be displayed in CWW to prompt the worker to inform the parent of the potential impact the early renewal may have on their Wisconsin Shares Child Care subsidy amount. Parents will also see a similar message in ACCESS when initiating an early renewal following the second Saturday but prior to Adverse Action of the 11<sup>th</sup> month.

A Wisconsin Shares Child Care early renewal may be completed along with a late health care renewal up to three calendar months after the health care renewal date as long as it is within the 11<sup>th</sup> month of the Wisconsin Shares 12 month eligibility period, but only if eligibility ended

because a renewal was not completed. These health care programs are included in this exception:

- BadgerCare Plus
- Family Planning Only Services
- Elderly, Blind, or Disabled (EBD) Medicaid
- Home and Community Based Waivers
- Institutional Medicaid
- Medicaid Purchase Plan (MAPP)
- Medicare Savings Programs


## **ACCESS AND CWW FUNCTIONALITY**

### **ACCESS Functionality**

A Child Care early renewal may only be initiated in ACCESS between the first business day following the second Saturday of the 11<sup>th</sup> month and prior to Adverse Action of the 11<sup>th</sup> month of the 12 month eligibility period if there is also a timely renewal for an IM program. Child Care renewal initiated after Adverse Action of the 11<sup>th</sup> month is considered timely.


A red warning message will be displayed in ACCESS when Child Care is the only program open on a case and the parent tries to initiate a renewal in ACCESS prior to Adverse Action of the 11<sup>th</sup> month of the current Child Care 12 month eligibility period.

#### **Before you can go to the next page:**

 You are not able to complete a Wisconsin Shares Child Care renewal at this time because your renewal due date is too far in the future. You will receive a letter when your renewal is due.


The same red warning message will be displayed in ACCESS if an early renewal is attempted for Child Care by the parent via ACCESS prior to Adverse Action of the 11<sup>th</sup> month of the Child Care 12 month eligibility period, and when no IM program is due for a timely renewal. The parent will not be able to move past the Benefits Renewal Overview page in ACCESS without deselecting the Wisconsin Shares Child Care renewal request.

#### **Before you can go to the next page:**

 You are not able to complete a Wisconsin Shares Child Care renewal at this time because your renewal due date is too far in the future. You will receive a letter when your renewal is due.

After the first business day following the second Saturday but prior to Adverse Action of the 11<sup>th</sup> month, when a parent initiates a Child Care early renewal along with a timely renewal for an IM program, a soft stop yellow message regarding the impact of the Child Care early renewal process will be displayed in ACCESS.

#### **Attention:**

 By requesting an early Wisconsin Shares Child Care renewal you agree to the following:

- Your Wisconsin Shares Child Care subsidy amount may be reduced one month early
- You will need to complete an interview and provide any proof asked for by your agency. If you fail to do so your eligibility will end

If you agree to the terms of the Wisconsin Shares Child Care renewal, continue by clicking 'Next'.  
If you do not want to renew your Wisconsin Shares Child Care at this time, uncheck the renewal box and click 'Next'.

### **CWW Functionality**

A Child Care early renewal may be initiated in CWW as early as the first business day of the 11<sup>th</sup> month of the 12 month eligibility period if there is also a timely renewal for an IM program.

When Child Care is the only program on a case, a red warning message will display in CWW if the worker attempts to renew the Child Care eligibility prior to Adverse Action of the 11<sup>th</sup> month of the 12 month Child Care eligibility period.

**The following events have occurred:**

 **AE774:** Worker read to the parent:

A Wisconsin Shares Child Care renewal cannot be done at this time because the renewal due date is too far in the future. You will receive a letter when your renewal is due.

A red warning message will also be displayed in CWW if an early renewal is attempted for Child Care by the worker prior to Adverse Action of the 11<sup>th</sup> month of the Child Care 12 month eligibility period, and when no IM program is due for a timely renewal. The worker will not be able to proceed with any other renewal without entering “N—No Renewal/Review” for Child Care on the *Interview Details* page.

**The following events have occurred:**

 **AE775:** Worker read to the parent:

A Wisconsin Shares Child Care renewal cannot be done at this time because the renewal due date is too far in the future. You will receive a letter when your renewal is due.

(Worker Note) Please enter 'N - No Renewal / Review' for Child Care if you would like to proceed with any other renewal.

When the agency worker attempts to initiate an early Child Care renewal in CWW along with an IM program that is due for a timely renewal, a soft stop yellow message will be displayed in CWW to prompt the worker to inform the parent of the potential impact the early renewal may have on their Wisconsin Shares subsidy amount. The worker is required to explain to the parent the information listed in the yellow CWW informational message. The agency worker can initiate an early renewal in CWW as early as the first business day of the 11<sup>th</sup> month prior to the Child Care renewal month.

**The following events have occurred:**

 **AE776:** Worker read to the parent:

By choosing to complete an early Wisconsin Shares Child Care renewal, you understand the following changes may happen: the subsidy amount may change, the current eligibility period will be shortened by one month, the Wisconsin Shares Child Care interview is required, and verifications must be provided. If verification is not provided, your eligibility will end. Once you choose to go forward with an early renewal the decision cannot be undone. Do you agree to go forward with the early renewal?

(Worker Note) If the individual agrees to the terms of the early Wisconsin Shares Child Care renewal, continue by clicking 'Next'. If the individual does not want to continue with the Wisconsin Shares Child Care renewal, change the Child Care interview type to 'N - No Renewal / Review'.

If the parent does not want to complete the early Child Care renewal, the worker must explain to the parent the other options that they have for completing the renewal:

- The parent can complete the renewal and the interview now for their IM program(s) only, but they must call back to the agency after the Adverse Action date to complete their timely Child Care renewal and interview.
- The parent can wait to contact the agency after the Adverse Action date to complete both the IM and Child Care interviews, at which point the Child Care renewal will also be timely rather than early.
- The worker can schedule a date and time after the Adverse Action date to call the parent to complete both the IM program and Child Care interviews.
- The worker can tell the parent the date after Adverse Action so the parent can resubmit the Child Care renewal through ACCESS Renew My Benefits.

**Note:** If the early renewal is completed, which includes the interview and all verification, prior to Adverse Action of the 11<sup>th</sup> month prior to the renewal month; this will shorten the current Child Care certification period to 11 months. This could result in the Assistance Group (AG) moving to a different copayment period earlier than 12 months. The new certification period would begin

the month after the Child Care program eligibility is confirmed, and the next renewal date would be set for 12 months from the early renewal month.

If the early renewal is initiated prior to Adverse Action of the 11<sup>th</sup> month of the 12 month Child Care eligibility but the interview and all verification is not submitted until after Adverse Action of the 11<sup>th</sup> month, then the Child Care renewal will be considered timely rather than early. The parent will not lose one month of eligibility for the current eligibility period.

**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](mailto: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: [childcare@wisconsin.gov](mailto:childcare@wisconsin.gov) or (608) 422-7200.

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