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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: 19-29

DATE: 08/28/2019

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: Updates to Wisconsin Shares Child Care Confidentiality Policy

CROSS REFERENCE: Operations Memo [18-J8](#): Processing Applications and Cases for Safe at Home Participants
Process Help [Chapter 77 Safe at Home Wisconsin Shares Child Care Policy and Process Handbook](#),
Section 1.1.4 Confidentiality
[Electronic Case File Handbook: Reference: Confidential & Restricted Documents](#)

EFFECTIVE DATE: September 1, 2019

PURPOSE: The purpose of this Operations Memo is to provide new policy for the Wisconsin Shares Child Care Subsidy Program regarding confidentiality and Safe at Home participants.

BACKGROUND: In March 2019, Wisconsin Shares Child Care policy was updated to indicate that no information regarding a Safe at Home participant could be shared under any circumstances without a court order. After further research, the only information that is subject to a court order is information that the Income Maintenance (IM) agency may have regarding the parent's actual address [[Wis. Stat. s. 165.68\(4\)\(d\)](#)]. Actual address means the parent's residential street address, school address, work address, or any portion thereof.

POLICY: Section [1.1.4](#) of the Wisconsin Shares Child Care Policy and Process Handbook will be revised as follows with the next release. New policy is highlighted in yellow.

Section 1.1.4 Confidentiality

All Wisconsin Shares Child Care case information is confidential. No person may use or disclose information concerning applicants and participants of the Wisconsin Shares Child Care Subsidy Program for any purpose that is not related to the administration of the Wisconsin Shares Child Care Subsidy Program.

No information regarding a Safe at Home participant's actual address, including home, work, or school, may be shared under any circumstances, absent a court order. Any questions regarding this prohibition should be directed to the Department of Children and Families (DCF) BEFORE releasing any information to anyone. This rule is absolute and includes sharing with other government programs and agencies. The parent's Safe at Home mailing address can be shared with other programs as necessary.

Other information that is needed in order to administer the Wisconsin Shares Child Care Subsidy Program may be exchanged with other government agencies or third parties. This includes:

- Communication with Wisconsin Works (W-2) Financial and Employment Planners (FEPs) and FoodShare Employment and Training (FSET) workers regarding program activities.
- Communication with the Child Support Agency (CSA) regarding good cause claims, information needed to establish a child support case, and household composition.
- Communication with employers or other third parties when assisting the parent with obtaining verification.
- Communication with child care providers regarding discounts or authorizations.

There is no reason that local agencies need the actual home, work, or school address of a Safe at Home participant in order to determine eligibility or establish an authorization. Any documentation received that includes the parent's actual address must be redacted (made not readable) prior to scanning the verification into the Electronic Case File (ECF). Anything regarding the parent's actual address, including home, work, or school must not be entered in CARES Worker Web (CWW).

Certain case information is highly confidential and subject to additional safeguarding. Please refer to the Electronic Case File (ECF) Handbook "Reference\Document Types\Confidential and Restricted Documents" section for additional information on Restricted Documents.

The laws governing the protection of health information are stricter than the laws governing protection of other confidential information that is used to administer the Wisconsin Shares Child Care Program. The disclosure and use of health information is limited to others on a bona fide need to know basis only. A person or program in possession of such information shall not release it except as authorized by the individual. A person or program who receives such confidential information shall not retain the information unless implementation of additional safeguards can and will occur.

When obtaining any health information such as medical diagnosis from a service provider, the agency worker must obtain a signed release of confidentiality (form DCF-F-369-E Confidential Information Release Authorization).

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: childcare@wisconsin.gov or (608) 422-7200.

DCF/DECE/BELP/ERR and EAM