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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: 19-30

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: Authorization Begin Dates for Wisconsin Shares Child Care**

**CROSS REFERENCE:** [Wisconsin Shares Child Care Policy and Process Handbook](#)  
Section 2.3.6 Authorization Begin Dates at Application and Renewal  
Section 2.3.7 Authorization Begin Dates During Ongoing Eligibility  
Wis. Admin. Code [DCF s. 201.039\(11\)](#)  
Operations Memo [18-43](#)

**EFFECTIVE DATE:** October 1, 2019

**PURPOSE:** This Operations Memo introduces updated and new policy for authorization begin dates in the Wisconsin Shares Child Care Subsidy Program.

**BACKGROUND:** The recently updated [Wis. Admin. Code DCF 201](#) added new language to [DCF s. 201.039\(11\)](#) to include authorizations that are completed following a parent's eligibility redetermination. Authorization assessments that are completed within 30 calendar days of the request for assistance (RFA) date and within one (1) calendar month of the start date of the new eligibility period following a completed annual eligibility renewal are considered timely and the authorization may be backdated to those dates if the child was attending the child care provider and the child care provider met all of the policy requirements.

Conversely, authorization assessments that are completed more than 30 calendar days after the RFA date or more than one (1) calendar month from the start date of the new eligibility period following a completed annual eligibility renewal are considered late and may only be backdated to the first of the month in which the authorization assessment was completed. During ongoing eligibility, if an authorization ends and a subsequent authorization is requested

within 30 calendar days of the previous authorization ending, the new authorization may be backdated to the day after the last day of the previous authorization.

**POLICY:** A Wisconsin Shares Child Care annual eligibility renewal may be completed early (before adverse action in the eleventh month of eligibility), timely (between adverse action in the eleventh month and the renewal due date), or late (within one (1) calendar month of the case closing). Section 2.3.6 has been updated to be inclusive of all eligibility renewals. The start of the one (1) calendar month in which a timely authorization assessment must be completed is from the start date of the new eligibility period following a completed annual eligibility renewal regardless of when the renewal is completed.

New policy has been added to Section 2.3.7 for the authorization begin date of a case with ongoing eligibility to be able to be backdated to the day after the last day of the previous authorization if the request for a new authorization is made within 30 calendar days of the previous authorization ending. Sections 2.3.6 and 2.3.7 of the Wisconsin Shares Child Care Policy and Process Handbook will be revised as indicated below in the next Handbook release. New policy is highlighted in yellow.

### 2.3.6 Authorization Begin Dates at Application and Renewal

An authorization assessment is considered timely when it is completed within 30 calendar days of the Request for Assistance (RFA) date (see 1.2.2) or within one (1) calendar month of the start date of the new eligibility period following a completed annual eligibility renewal (see 1.8.3). A renewal is considered to be completed when all verification has been received and eligibility has been confirmed. When the parent completes the authorization assessment within 30 calendar days of the RFA date or within one (1) calendar month of the start date of the new eligibility period, an authorization must begin on the latest of the following dates:

- The RFA date;
- The start date of the new eligibility period following a completed annual eligibility renewal;
- The date the child began attending the child care provider;
- The date the child care provider has met both of the following requirements:
  - The child care provider was regulated.
    - The authorization worker may backdate the authorization to the child care provider's certification application date as long as the certification is now completed, but the authorization worker may never backdate the authorization to a licensed provider back to the licensing application date.
  - The child care provider had a YoungStar or Wisconsin Shares Participation Contract entered in the system.

If the parent does not provide all of the necessary information to complete a timely authorization assessment within 30 calendar days of the RFA date or within one (1) calendar month of the start date of the new eligibility period following a completed annual eligibility renewal, it is considered late and the authorization must follow policy requirements for authorization begin dates during ongoing eligibility (see 2.3.7).

**Note:** An authorization begin date at initial eligibility may not be backdated further than the RFA date unless policy requirements are met for relatives with court-ordered placement receiving the Kinship Care payment (see 2.3.6.1).

**Process:** In order to write an authorization in CSAW, the provider must have a completed contract with Fidelity National Information Services (FIS). However, the FIS contract date is not a factor in determining the authorization begin date. If the FIS contract is not completed when all

other requirements are met, the authorization worker must backdate the authorization to the latest date in the list above once the contract is completed and entered in the FIS system.

**Example 1 (At Application):** Phil applies for Wisconsin Shares Child Care on May 15. He completes all of his eligibility requirements and is determined eligible on June 8. Also on June 8, he provides all required approved activity schedules and information for the authorization assessment and he provides the name of the provider location that his children have been attending since April. The provider was in compliance with the requirements for Wisconsin Shares Child Care prior to the RFA date. Eligibility will begin May 1 in CWW, but the authorization in CSAW will begin on May 15 because the authorization assessment was completed within 30 calendar days of the RFA date.

**Example 2 (At Application-Closed More than One (1) Calendar Month):** Charlotte is receiving Wisconsin Shares Child Care for her daughter, Olivia, when she is determined to be in noncooperation with the Child Support Agency. She does not claim good cause, and her Wisconsin Shares Child Care eligibility ends on March 30. On May 8, Charlotte begins cooperating with the Child Support Agency. She reapplies for Wisconsin Shares Child Care on May 9 and is again determined eligible for Wisconsin Shares Child Care. Because the case was closed for more than a calendar month, this is a new application. Olivia's authorization can begin on May 9, if Olivia was attending the child care program on this date, the provider met the policy requirements listed above, and Charlotte completes the authorization assessment by June 9.

**Example 3 (Early Renewal):** Priya's annual renewal is due May 31; however, she decides to do an early renewal on April 8 along with her FoodShare renewal. Her eligibility is confirmed on April 11 and her new 12-month eligibility period for Wisconsin Shares Child Care will start beginning May 1. Her authorization worker ends the current authorization as of April 30 to align with the current eligibility period (see 1.8.3.1). Priya has one (1) calendar month from the start date of the new eligibility period to complete the mandatory authorization assessment. She completes the authorization assessment on May 10 and her worker backdates the authorization begin date to May 1 because she completed the assessment within one (1) calendar month of the start of her new 12-month eligibility period.

**Example 4 (Annual Renewal):** Amina's annual eligibility renewal is due April 30. She completes the interview and provides all of the verification on April 20. Amina's new eligibility period starts May 1. She completes the authorization assessment on May 25. The authorization may be backdated to begin May 1 because she completed the authorization assessment within one (1) calendar month of the start of her new 12-month eligibility period.

**Example 5 (Late Renewal):** Anthony's case was due for a Wisconsin Shares Child Care renewal on May 31. Anthony did not complete his renewal timely and his case closed on May 31. On June 28, Anthony completes the renewal interview, provides his written signature, and submits all required verification. Eligibility re-opens effective June 1 in CWW because he completed the late renewal within one (1) calendar month of the case closing. Anthony completes his authorization assessment on June 30. The authorization worker can backdate the authorization to June 1 because the authorization assessment was completed within one (1) calendar month of the start of Anthony's new 12-month eligibility period and his child had been attending the provider throughout the month of June. The authorization may begin on June 1 as long as the provider is already in compliance with all of the Wisconsin Shares requirements.

### 2.3.7 Authorization Begin Dates During Ongoing Eligibility

Ongoing eligibility begins the calendar month following the completion of the Request for Assistance (RFA) in accordance with Section [1.2.2](#), and the calendar month following the completion of an annual eligibility renewal in accordance with Section [1.8.3](#).

A mandatory authorization assessment according to Section [2.4.2.1](#) is required following eligibility confirmation for either a new application or a renewal and is considered late if it is completed more than 30 calendar days from the RFA date, more than one (1) calendar month from the start date of the new eligibility period following a completed annual eligibility renewal, or when there is a calendar month gap or more between the end of one authorization and the start of another authorization.

If the authorization assessment is completed more than 30 calendar days from the RFA date, more than one (1) calendar month from the start date of the new eligibility period following a completed annual eligibility renewal, or one (1) calendar month gap or more between the end of one (1) authorization and the start of another authorization, the authorization may only be backdated to the first of the month that the authorization assessment was completed, as long as:

- The child was attending the child care provider.
- The child care provider has met both of the following requirements:
  - The child care provider was regulated.
    - The authorization worker may backdate the authorization to the child care provider's certification application date as long as the certification is now completed, but the worker may never backdate the authorization to a licensed provider back to the licensing application date.
  - The child care provider had a completed YoungStar or Wisconsin Shares Participation Contract entered in the system.

If these requirements are not met as of the first of the month, the authorization must begin on the date that all requirements were met.

If an authorization has an end date during ongoing eligibility (not following an application or renewal), a new authorization may be backdated to the day after the last day of the previous authorization if the request for the new authorization is made within 30 calendar days of the previous authorization ending.

**Process:** In order to write an authorization in CSAW, the provider must have a completed contract with Fidelity National Information Services (FIS). However, the FIS contract date is not a factor in determining the authorization begin date. If the FIS contract is not completed when all other requirements are met, the worker must backdate the authorization to the latest date in the list above once the contract is completed and entered in the FIS system.

**Example 1 (Late Authorization Assessment at Application):** Bao applied and was determined eligible for Wisconsin Shares Child Care on May 3. She did not complete the authorization assessment until June 7. The authorization for her child can only be backdated to June 1 because the authorization assessment was completed more than 30 calendar days from the RFA date.

**Example 2 (Late Renewal, Late Authorization Assessment):** Bonnie's case was due for a Wisconsin Shares Child Care renewal on May 31. The annual eligibility renewal was completed late and eligibility was confirmed on June 30. Eligibility re-opened effective June 1 in CWW. Bonnie completed the authorization assessment on August 30. Because the authorization assessment was completed more than one (1) calendar month from the start date of the new

eligibility period following the completed renewal, the authorization may only go back to the first of the month in which the authorization assessment was completed (August 1).

**Example 3 (Ongoing Eligibility):** Gabriel was determined to be in noncooperation with the Child Support Agency on April 10. She did not claim good cause within seven (7) business days of receiving the Notice of Proof Needed, and her Wisconsin Shares Child Care eligibility ended April 30. On May 10, Gabriel begins cooperating with the Child Support Agency and the noncooperation is ended. Because Gabriel is within one (1) calendar month of Wisconsin Shares eligibility ending, Gabriel's Wisconsin Shares eligibility will reopen as of May 1 without the need to complete the application and interview process. Gabriel's case would be considered ongoing, and the authorization could be backdated to May 1 as long as Gabriel completes an authorization assessment by May 31.

**Example 4 (Ongoing Eligibility):** Toby's son has an authorization through the end of the school semester. He forgot to request a summer authorization and the current authorization ended on June 12. On July 5, Toby contacted the local agency and completed an optional authorization assessment. The agency worker can backdate the summer authorization to June 13 because Toby completed the authorization assessment within 30 calendar days of the previous authorization ending. The summer authorization may be written starting June 13.

### **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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