

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

DECE/BCCSA OPERATIONS MEMO

No: 21-01

DATE: 01/27/2021

Child Care

FROM: Junior Martin, Director  
Bureau of Child Care Subsidy Administration  
Division of Early Care and Education  
Department of Children and Families

**SUBJECT: Wisconsin Shares Child Care Case Comments Policy Changes**

**CROSS REFERENCE:** [Wisconsin Shares Child Care Policy and Process Handbook](#)  
Section 1.9 Eligibility Comments  
Section 2.4.1 Authorization Comments

**EFFECTIVE DATE:** January 27, 2021

**PURPOSE:** The purpose of this Operations Memo announces a policy requirement to document eligibility and authorization-related details for a Wisconsin Shares Child Care case.

**BACKGROUND:** Agency workers must enter comments in required fields in CARES Worker Web (CWW) when determining Wisconsin Shares Child Care eligibility and in Child Care Statewide Administration on the Web (CSAW) when creating a child care authorization. In addition, the Wisconsin Shares Child Care Policy and Process Handbook specifies information related to eligibility determination and authorizations that either must be or are encouraged to be documented in a CWW or CSAW case comment.

All sections in Chapter 1 that state a case comment must be entered in CWW are listed in a new Eligibility Comments policy and all sections in Chapter 2, including the current Authorization Comments policy that state a case comment is encouraged to be entered in CSAW, are included in the revised Authorization Comments policy.

Case comments are no longer encouraged; they are now required. Case comments ensure compliance with the Child Care Administration section of the county and tribal contracts; support the quality review processes completed by DCF and provide documentation for changes made to a case. The policies do not specify the location of where a case comment must be entered, only the information that must be included. Agency workers should enter case comments in either CWW, CSAW, or both systems depending on local practices.

**POLICY:** The following policy will be added to the Wisconsin Shares Child Care Policy and Process Handbook with the next release. New policy is highlighted in yellow and policy that has been removed is indicated with red strikethrough.

### **Section 1.9 Eligibility Comments**

CARES Worker Web (CWW) provides comment boxes on several of the eligibility-related pages and a Case Comments page where all CWW case comments are displayed. Case Comments must describe relevant information reported during the initial eligibility determination, renewal, reported changes, and any contact with a parent relevant to their case.

The following information must be documented in a case comment in CWW, CSAW or both systems depending on local agency practices:

- An interactive face-to-face or telephone interview at initial application, program add, and the annual eligibility renewal is entered in CWW on the Application/Review Interview Details page. If both required attempts to contact the parent for a telephone interview are unsuccessful, the worker must document in Case Comments that the parent was unavailable at the appointment time and the follow-up call (see 1.2.4).
- When a worker completes the initial eligibility determination, a summary of the interview must be documented in Case Comments, describing the interview, signature requirements and any outstanding verification requirements (see 1.2.6).
- The shared placement schedule used to determine the Child Care Assistance Group (see 1.3.1.2).
- The supervised living arrangement if a parent who is under the age of 18 resides in an independent living arrangement that is approved by a licensed or public child welfare agency and supervised by an adult (see 1.3.8.6.1).
- When a worker enters an Activity Break Period following a reported permanent loss of or temporary break in approved activity, including the parent's response or lack of response (see 1.3.9.2.1 and 1.5.11.2).
- Information about the family's liquid assets unless the family initially indicates that they do not meet the asset limit (see 1.4.6).
- When a worker receives any form of employment verification that appears questionable or falsified (see 1.5.8).
- The justification for applying the policy when a parent self-declares new employment and income from new employment (see 1.5.11.1).
- Details from the phone conversation when a worker makes collateral contact with the employer as employment verification because the worker is assisting the client (see 1.5.12).
- Details from the phone conversation with a CPS worker when a child was removed from the home by the Child Protective Services (CPS) agency and the IM worker needs the biological or adoptive parent's income to determine eligibility, including whether the CPS worker was able to provide this information (see 1.5.12).
- Details from the phone conversation if an agency worker verifies through collateral contact that a family is receiving or has been approved to receive the Kinship Care payment (see 1.7.1).

- When a worker completes an annual eligibility renewal, a summary of the renewal interview must be documented in case comments describing the interview, signature type obtained and any outstanding verification requirements (see 1.8.3).

**It is a best practice to document the following in a case comment in CWW, CSAW or both systems depending on local agency practices:**

- The local agency's decision when determining that participation in basic education will facilitate the individual's efforts to maintain employment (see 1.3.8.6.2).
- The local agency's decision when determining that participation in a course of study at a technical college, or educational courses that provide an employment skill will facilitate the individual's efforts to maintain employment (see 1.3.8.6.3).
- The local agency's decision when determining that participation in online basic or post-secondary education will facilitate the individual's efforts to maintain employment (see 1.3.8.6.4).

### **Section 2.4.1 Authorization Comments**

CSAW provides comments boxes on several of the authorization-related pages and offers a Case Comments Summary page where all CSAW case comments are displayed. During Following the authorization assessment at initial eligibility determination, renewal, reported changes, and any contact with the parent, agency workers must document the authorization details relevant to their case. ~~authorization workers are encouraged to use the CSAW comments fields to describe relevant information regarding the authorization, such as:~~

The following information must be documented in a case comment in CARES Worker Web (CWW), CSAW or both systems depending on local agency practices:

- Any delay in the authorization being completed within two (2) business days of completing the authorization assessment (see 2.3.5).
- An explanation for the length of an authorization, if less than 12 months (i.e. school year ending, W-2 Employability Plan (EP) end dates, etc.) (see 2.4.2). ~~why it is only 6 weeks long, is it because it is a school-age child, W-2 activity is ending,))~~.
- If the parent selects a reduced hour authorization or any number of hours other than the original authorized hours after completing an authorization assessment based on continuity of care (see 2.4.2.2 and 2.4.3.4.1).
- ~~Notes about~~ Start and end times of the parent's work or other approved activity schedule (see 2.4.3).
- ~~Notes about the approved activity schedule, including any~~ The questions and answers used to resolve any 10 hours or less per week discrepancy between the approved activity verification and the reported schedules (see 2.4.3.1).
- ~~Notes regarding~~ A summary of the justification for the inclusion of gaps between activities or sleep time in the authorized hours ~~that are covered (a summary of the justification for the inclusion of these hours).~~ (see 2.4.3.2).
- ~~Notes about shared placement schedules (describe the schedule).~~
- ~~Notes about unexpected school closure hours that are added after the fact.~~

- ~~Notes regarding a parent's reported change in need of authorized hours during the 12-month eligibility period.~~
- Justification for authorized hours for self-employed Foster Parents, Subsidized Guardians, Interim Caretakers and relatives with court-ordered placement receiving the Kinship Care payment (see 2.4.3.7).
- The rationale for the amount of travel time or the lack of travel time (see 2.4.3.10).
- The shared placement schedule used to create the authorization to cover the number of hours the parent needs for his or her approved activity plus travel time (see 2.4.4.1).
- When creating an authorization for Co-Located Head Start and 4K School Programs and the parent is only in their approved activity during part of the school program hours (see 2.4.4.2).
- ~~Information regarding~~ The child's school schedule (i.e. start and end times, short days on Mondays, or hours of a 4K or a Head Start school program, etc.) (see 2.4.4.2 and 2.4.4.3).
- The reason for school closed hours/days (see 2.4.4.4.1).
- The reason for the override rate when a Provider Price Type – Override (Special Need) rate is used to create an authorization (see 2.4.7.1). Agencies must not include any health information or diagnosis in case comments (see 1.1.4).
- A description of any reported discounts the parent receives from the provider (see 2.4.7.2).
- A summary of documentation that shows a child care need which exceeds 12 hours per day (see 2.4.8).
- When a hardship authorization is written (see 2.4.9.1).
- Attempted contacts to the parent before ending an authorization after the agency receives notification from a provider that a child has not attended the child care provider within the previous 30 calendar days (see 2.4.11).

### ***CONTACTS:***

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