



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: 21-18 **AMENDED**

DATE: ~~07/20/2021~~ 09/30/2021

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 Subsidy for the 2021-2022 School Year**

**CROSS REFERENCE:**

[Wisconsin Shares Handbook](#)

Section 2.3.8 Authorization End Dates

Section 2.4.2.1 Authorizations Based on Assessment Results

Section 2.4.4.3 Authorizations for Children in Grades K through 12

Section 2.4.4.4.1 School Closed Hours

Section 2.4.9 Changing and Ending an Authorization During a Month

Section 2.4.9.1 Authorizations in Situations of Hardship

[DPI COVID-19 Attendance Recommendations](#)

[Operations Memo 20-14](#)

**EFFECTIVE DATE:** Immediately

**PURPOSE:** The purpose of this Operations Memo is to provide guidance to local agencies on authorizing child care for school-age children during the 2021-2022 school year.

**BACKGROUND:** Many school districts continue to offer a virtual learning option for the 2021-2022 school year. Under state law, school districts determine the operations of their buildings and the learning environment. The Department of Public Instruction (DPI) has created a [resource](#) to help school districts determine which educational delivery method is best for their district. Wisconsin Shares has implemented a temporary process to accommodate the needs of families that is effective for the 2021-2022 school year.

**POLICY:**

**Current Policy:** Wisconsin Shares Handbook Section 2.4.4.3 Authorizations for Children in Grades K through 12:

Wisconsin Shares does not allow authorizations for time during the typical school day for children in grades K through 12 while the school year is in session, in accordance with 45 C.F.R. s.98.56(c). The typical school day is determined by the local agency after a review of the school

district hours of operation and school district calendar for schools within the particular county or tribe.

Agency workers must document the child's school schedule (i.e. start and end times, short days on Fridays, etc.) in case comments (see 2.4.1).

Part-time or full-time authorizations for children in grades K through 12 can be made for times outside of the typical school hours during the school year and for times when school is not in session, (e.g. summer break, planned holiday breaks, or other planned school-closed times).

Children who are homeschooled, truant, or suspended from school are not eligible for an authorization during the typical school day. Children who are homeschooled, truant, or in out-of-school suspension from school are also not eligible for an authorization for school closed hours.

Expelled children who are considered dis-enrolled may be eligible to receive an authorization during the typical school day. The parent will have been notified by the school if the child is expelled and dis-enrolled. If a child's enrollment status is questionable, the parent must provide verification of the child's school enrollment status.

***Temporary Policy for the 2021-2022 School Year:***

The "typical school day" continues to be defined as the time that the child receives in-person instruction at the school from a teacher employed by the school district.

However, under this temporary guidance the time that a child participates in virtual instruction in a child care setting or time that a child who usually participates in in-person instruction is completing packets of work provided by the school is not considered to be part of the "typical school day" and can be authorized for Wisconsin Shares child care while the parent is participating in their approved activity.

There are two types of virtual instruction:

1. Synchronous virtual instruction: The child logs in to the classroom at scheduled times and participate from a location other than the school building (i.e. home or child care location).
2. Asynchronous virtual instruction: The child does not need to log in to a virtual classroom at scheduled times (i.e. schoolwork can be completed at a time of the parent and child's choosing).

***PROCESS:*** The following sections provide instruction related to specific aspects of the authorization.

***Authorized Hours:*** Agencies should follow the standard school year process to only authorize before and after school care (based on the parent's needs) when the child attends in-person school. A child who attends a child care facility during the day while the parent participates in their approved activity can receive an authorization that includes the virtual school hours at the child care facility as well as before and after school care, child care that is needed due to early release, and child care that is needed during scheduled school closed days.

Children attending school in person who have a before/after school authorization can receive additional hours on days when a parent or a school district needs to pivot from in-person to

virtual instruction due to an outbreak of the virus. The policy for school closed days has not changed (see 2.4.4.4.1).

Parents **may not** receive an authorization **for virtual schooling** if their child is participating in virtual schooling at a location other than the child care provider and during times the parent is not participating in their approved activity.

Children who are homeschooled, truant, or suspended from school **are not** eligible for an authorization during the typical school day and are also not eligible for school closed hours (see 2.4.4.4.1). The best way to differentiate between homeschooling and virtual instruction is to ask the parent who is providing the instruction. If the parent decides the curriculum and has registered with DPI as homeschooling their child, then it is homeschooling. If the child is receiving instruction from a teacher employed by the school district, then it is virtual schooling.

***Authorizations Based on Assessment Results:*** Per Section 2.4.2.1, authorizations must be based on the assessment results when a school-age child transitions from the summer break to the fall school year. This includes a child who attends virtual **schooling** and transitions from virtual to in-person instruction. This could result in reduced authorization hours and the new authorization must be based on the assessment results.

***Hardships:*** Section 2.4.9 and 2.4.9.1 describe circumstances when a parent may receive a new authorization during a month after an authorization has already been created. Several of these situations could relate to COVID-19 outbreaks at the provider that would cause a hardship for parents. Because the current hardship situations could already apply to COVID-19, there is no change to current policy. If a provider closes due to COVID-19-related reasons, agency workers are not required to contact the provider, **unless questionable**. This is because the provider may be difficult to contact when their center is closed and the parent may need a new authorization immediately in order to **participate in their approved activity**. However, if a parent requests more than one change in provider during the same month due to COVID-19-related reasons, the request should be submitted to the Child Care Help Desk ([childcare@wisconsin.gov](mailto:childcare@wisconsin.gov)) for determination.

***COMMUNICATION:*** Providers will be informed of this practice continuing for the 2021-2022 school year through the Child Care Listserv emails from the Division of Early Care and Education Administrator. The [DCF website](#) provides information for both providers and parents.

Parents will be informed of this change through a message in the Parent Portal and through the department's social media accounts. The information is also being provided to Child Care Resource & Referral (CCR&R) agencies to further disseminate to parents, providers, and other community partners.

### ***CONTACTS:***

For Wisconsin Shares 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 Program Integrity technical assistance, Child Care CARES/CWW and CSAW Processing Questions statewide, and policy questions in Milwaukee County, contact the Child Care Help Desk at: [childcare@wisconsin.gov](mailto:childcare@wisconsin.gov) or 608-422-7200.

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