



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: 23-05
DATE: 03/01/2023
Child Care

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

SUBJECT: Financial Eligibility Verification for Wisconsin Shares

CROSS REFERENCE: [Wisconsin Shares Handbook](#),
Section 6.4 Monthly Income Calculations
Section 7.9 Financial Eligibility Verification

EFFECTIVE DATE: Immediately

PURPOSE: This memo announces clarifications to the use of pay stubs to verify financial eligibility when the pay stubs do not accurately represent prospective income.

BACKGROUND: For Wisconsin Shares, monthly income is budgeted prospectively by making the best estimate of income based upon the information available (see 6.4). Parents can verify income by providing pay stubs from the immediately preceding 30 calendar days (see 7.9). Pay stubs showing year-to-date (YTD) can be used to calculate missing pay stubs. Previously, policy was silent regarding what agency workers should do when the pay stubs that a parent has available are not reflective of prospective income.

This revision provides the clarification that if pay stubs from the immediately 30 preceding calendar days are not representative of prospective income or the parent has less than 30 days of pay stubs due to new employment, the agency worker must request additional verification. If additional verification is requested but the employer refuses to provide it, the local agency may accept the submitted pay stubs but use the parent’s statement of expected future hours and wages to prospectively budget income. This revision also removes the requirement to document in case comments the self-declared number of hours a parent works when the parent is salaried, and paystubs do not include the number of hours worked. Parents still need to self-declare their work schedule for authorization assessments (see 16.1.1).

POLICY: The following new policy highlighted in yellow will be added to the Wisconsin Shares Handbook with the next update. Policy with ~~red-strikethrough~~ is being deleted.

Section 7.9 Financial Eligibility Verification

Financial eligibility must be verified during the initial eligibility determination process and at each annual renewal. If a person is added to an ongoing case, all financial information related to that individual must be verified.

Employment

At application and renewal, each adult in the Assistance Group (AG) must verify earned income by providing documentation of any earned income received in the past 30 calendar days.

Acceptable Sources of Employment Verification

- Dated pay stubs or pay statements for the immediately preceding 30 calendar days. The pay stubs must include the employer and employee name, rate of pay, and number of hours worked.
 - Pay stubs showing year-to-date (YTD) can be used to calculate missing pay stubs ~~if the parent has pay stubs from the beginning and end of the 30-day period.~~ For income that fluctuates, more than 30 calendar days of pay stubs may be used.
 - For more information about calculating missing pay stubs, see Process Help Section 16.4.3.
 - If pay stubs from the past 30 calendar days are not representative of prospective income (see 6.4) or the parent has less than 30 calendar days of pay stubs due to new employment, the local agency must request additional verification to budget income prospectively. If additional verification is requested but the employer refuses to provide it, the local agency may accept the submitted pay stubs and use the parent's verbal statement of expected future hours and wages to prospectively budget income.
 - If the individual is classified as exempt or salaried under the Fair Labor Standards Act, the employer might not include the hours worked ~~may not be included~~ on ~~their the~~ pay stub. ~~If the hours are not included on the pay stubs, the agency worker must document the individual's stated hours worked on the Employment page in CWW.~~ This is acceptable verification; the agency worker must not request further verification and no documentation of hours is required.
 - For caretaker parents of children in out-of-home care whose eligibility is based on their biological or adoptive parents' income at the time they were removed from the home ([see 9.2](#)), the caretakers' employment verification does not need to contain wages or salary information for the purpose of verifying participation in an approved activity. All other requirements, such as employer and employee name, hours worked, etc. for each type of verification listed must be met.
- A completed [Employer Verification of Earnings form \(EVF-E\) \(F-10146\)](#) with the employer's signature, number of hours of work per week, company name, and rate of pay.

- An email or letter from the employer bearing the employer's legible name, contact information and signature and includes the employee's name, rate of pay, and hours of work.
- Equifax verification received directly from Equifax or through the Federal Data Services Hub (FDSH) wage match (so long as the parent confirms the data is correct).
- As a last resort, collateral contact with the employer. The agency worker must document the phone conversation in case comments including the date, time, and individual's contact information.

Example: Grant is applying for Wisconsin Shares on December 12. He started a new job on December 4 and only has one (1) pay stub to show his income. Because he started during a pay period, the pay stub also does not reflect the typical number of hours he will be working. The employer states that the information will be available in The Work Number/Equifax and refuses to return the EVF-E. The agency worker scans the one (1) pay stub into the Electronic Case File (ECF) and uses Grant's stated income and ongoing hours to enter his income. The worker must not request additional verification later unless Grant's wages become questionable.

Agency workers are not required to enter the Federal Employer Identification Number (FEIN) on the CWW Employment page for Wisconsin Shares.

If any form of employment verification appears questionable, the agency worker must document this in case comments ([see 12.1](#)) and request a second form of verification ([see 7.6](#)).

Note: Local agencies may ask for pay stubs for the entire preceding 30 calendar days when employment is not new and there is an expectation that paychecks would have been issued. The EVF-E is valid verification of employment and income, but if it is questionable whether the parent is completing the form instead of the employer, the local agency must follow guidance in [Section 7.6](#).

Process: Agency workers must update CWW to reflect changes in income by running and confirming eligibility with dates if necessary to ensure the income updates for the correct month. The eligibility determination must be confirmed for CSAW to use the new income in determining copayments and copayment periods.

CONTACTS:

For Wisconsin Shares policy questions outside of Milwaukee County contact your Bureau of Regional Operations (BRO), Child Care Coordinators at 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 or 608-422-7200.