



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

DECE/BCCSA OPERATIONS MEMO

No: 21-12

DATE: 04/12/2021

Child Care

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

**SUBJECT: Client Overpayments During COVID-19 Emergency Declaration**

**CROSS REFERENCE:** [Executive Order #72](#); [DCF Guidance Order #21](#), [Emergency Order #3](#); [Wisconsin Shares Child Care Policy and Process Handbook](#): Section 4.5.2.1 Establishing a Client Overpayment, Section 4.5.4 Overpayment Classifications

**EFFECTIVE DATE:** April 12, 2021

**PURPOSE:** The purpose of this Operations Memo is to provide procedure updates about client error and agency error overpayments that occurred during the COVID-19 Emergency Declaration, and child non-attendance due to COVID-19.

**BACKGROUND:** Due to the COVID-19 pandemic, several Wisconsin Shares child care subsidy administrative rules were waived by executive orders. In addition to these changes, the Department of Children and Families initiated automatic payments for Wisconsin Shares Child Care authorizations with remaining balances on their MyWICChildCare EBT card from March 1, 2020 through June 30, 2020. The Department has issued [guidance](#) that Wisconsin Shares administrative errors or client errors will not result in a child care client overpayment. Unless an intentional program violation (IPV) took place.

Over the course of the COVID-19 pandemic, some families were asked to quarantine by their local health department or medical care provider due to a positive COVID-19 test or exposure to a person infected with COVID-19. This may result in a child underutilizing their authorized hours for a duration exceeding 30 days. Quarantine related absences under 30 days will not result in a client or provider overpayment.

**PROCEDURE:****Calculating Overpayments During COVID-19 Emergency Declaration**

Overpayments due to client error or agency error will not be established if the violation period occurred between March 1, 2020 and June 30, 2020. Client overpayments for intentional program violations between March 1, 2020 and June 30, 2020 may be established. If an intentional program violation occurred during this time, local agencies are instructed to subtract the automatic payments made by the Department from the overpayment amount. Local agencies must indicate which payments were initiated by the parent when completing the Client Investigation Recommendation form [DCF-F-2893 \(previously known as the IPV request form\)](#).

To identify payments made by the Department, complete the following steps.

1. Review the client's CSAW Case Transactions page.
2. The Department made the automatic payments on the following dates. Determine if the transactions took place on:
  - March & April: 04/05/2020
  - May: 05/07/2020
  - June: 06/09/2020
3. If a transaction took place on the dates listed above, review the amount column. Transactions made by the Department will show a red "X" symbol and occur after 6:00pm. Transactions made by the department are subtracted from the overpayment amount for the month the transaction occurred.

Amount	Account Balance	Transaction Time
(\$638.37) *	\$0.00	05/07/2020 06:29:29 PM
\$638.37	\$638.37	05/01/2020 12:01:00 AM
(\$309.45) *	\$0.00	04/05/2020 06:53:05 PM

**Authorization Underutilization Due to Family in Quarantine**

After June 30, 2020, if a family is instructed to quarantine due to a COVID-19 positive test or COVID-19 exposure for less than 30 calendar days, the local agency must not establish a parent or provider overpayment. If the COVID-19 related absence is greater than 30 calendar days, the local agency must contact the Bureau of Child Care Subsidy Administration Program Integrity staff at [DCFBPITArequest@wisconsin.gov](mailto:DCFBPITArequest@wisconsin.gov) for consultation.

***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.

For investigation, overpayment, and program integrity internal procedure development questions; written resource and subject matter expert requests; and VPAs and Retractions, please contact the Bureau of Child Care Subsidy Administration Program Integrity Unit at: [DCFBPITArequest@wisconsin.gov](mailto:DCFBPITArequest@wisconsin.gov) or the [Technical Assistance Request Page](#) on the DCF Website.

For Wisconsin Shares child care Chapter 3 and 4 policy questions outside of Milwaukee County contact the Bureau of Regional Operations (BRO) Child Care Policy Help Desk at [BROCCPolicyHelpDesk@wisconsin.gov](mailto:BROCCPolicyHelpDesk@wisconsin.gov).

For referrals regarding alleged client or provider child care fraud or other program integrity concerns, please submit a referral to the Child Care Fraud Mailbox at [DCFMBCHILDCAREFRAUD@wisconsin.gov](mailto:DCFMBCHILDCAREFRAUD@wisconsin.gov).

DCF/DECE/BCCSA/MRFH