



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: 23-25
DATE: 07/28/2023
Child Care

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

SUBJECT: Removal of Education Work Requirement for Wisconsin Shares

CROSS REFERENCE: [Wisconsin Shares Handbook](#),
Section 5.1.2 Education
Section 5.1.2.1 High School
Section 5.1.2.2 Basic Education
Section 5.1.2.3 Postsecondary Education
Section 7.8 Approved Activity Verification

EFFECTIVE DATE: August 1, 2023

PURPOSE: The purpose of this operations memo is to announce a policy change removing the work requirement for education as an approved activity for Wisconsin Shares.

BACKGROUND: Currently, parents who are enrolled in basic education or postsecondary education are required to also work 20 hours per month for education to be an approved activity. Policy is being changed to allow education to be a stand-alone approved activity without any work requirement. Parents are eligible for Activity Break Periods when their education status changes, the same as any other approved activity. Policies regarding Activity Break Periods when a parent who is participating in basic or post-secondary education loses their employment or reduces their work hours below 20 hours per month have been removed as they are no longer applicable.

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 5.1.2 Education

Participation in the following types of education is an approved activity for Wisconsin Shares:

- High School (see 5.1.2.1)

- Basic Education (see 5.1.2.2)
- Postsecondary Education (see 5.1.2.3)
- Online education (see 5.1.2.4)

Once child care is authorized for a semester, parents must report if a course is cancelled, or they withdraw from a course so that a new authorization assessment can be completed (see 17.1).

Education is a stand-alone approved activity. There is no work requirement for a parent to have education as their approved activity.

Section 5.1.2.1 High School

High school or a course of study meeting the standards established by the state superintendent of public instruction for a high school equivalency, such as a High School Equivalency Diploma (HSED) or General Education Development (GED), is an approved activity for teen parents younger than 20 years old. These parents are not subject to ~~the 20-hour per month work requirement or~~ the 24-month education limit.

Note: If the parent is age 20 or older and is pursuing a GED or HSED, see Section 5.1.2.2.

To determine if the parent who is under the age of 18 is participating in an approved activity, they must reside in one (1) of the following living arrangements:

- With their custodial parent
- With a kinship relative who may or may not be receiving the Kinship Care benefit
- In a foster home
- In the home of a subsidized guardian or interim caretaker
- In an independent living arrangement that is approved by a licensed or public child welfare agency and is supervised by an adult; the supervised living arrangement must be documented in case comments (see 12.1)

Section 5.1.2.2 Basic Education

Participation in basic education is an approved activity for Wisconsin Shares. Basic education includes English as a second language courses; literacy tutoring; General Education Development (GED); or High School Equivalency Diploma (HSED).

Note: If the parent is younger than age 20 and is enrolled in high school or is pursuing a General Education Development (GED) or High School Equivalency Diploma (HSED), see Section 5.1.2.1.

The local agency must determine that participation in basic education will facilitate the individual's efforts to maintain employment and document this decision in case comments (see 12.1).

Receipt of child care subsidy for basic education is limited to 24 months during the lifetime of the parent. Only the months that the parent is using child care subsidy for education count towards the 24-month time limit. Exact dates of participation must be recorded on the CSAW Parent Education Tracking page under the Basic Education Tracker (see 5.1.2.5).

~~Parents participating in basic education under this section must also be employed at least 20 hours per month throughout the semester to have basic education as an approved activity. Local agencies do not have discretion to require more than 20 hours per month of employment.~~

~~Teen parents younger than age 20 participating in ESL or literacy tutoring, but not GED or HSED, are subject to this work requirement.~~

~~Parents may be eligible for an Approved Activity Search Period (ACTS) if they are unable to maintain employment while participating in an education activity (see 5.3.1).~~

Section 5.1.2.3 Postsecondary Education

Participation in postsecondary education, including a course of study at a technical college or educational courses that provide an employment skill, is an approved activity for Wisconsin Shares.

The local agency must determine that participation in this activity will facilitate the individual's efforts to maintain employment and document this decision in case comments (see 12.1).

Receipt of child care subsidy for postsecondary education is limited to 24 months during the lifetime of the parent. Only the months that the parent is using child care subsidy for education count towards the 24-month time limit. Exact dates of participation must be recorded on the CSAW Parent Education Tracking page under the Postsecondary Education Tracker (see 5.1.2.5).

~~Parents participating in postsecondary education must also be employed at least 20 hours per month throughout the semester to have postsecondary education as an approved activity. Work study hours count toward the employment requirement. Local agencies do not have discretion to require more than 20 hours per month of employment. Parents may be eligible for an Approved Activity Search Period (ACTS) if they are unable to maintain employment while participating in an education activity (see 5.3.1).~~

Field placement, such as unpaid student teaching and unpaid internships, ~~do not meet the employment criteria of this section. However, this~~ may be included as part of the educational activity if school credits are awarded for completion.

Section 5.1.2.5 Education Tracking

When a parent has ~~both employment and~~ education as **one of** their approved activities, the CSAW Parent Education Tracking page must be used to track the parent's 24-month education limit as applicable for basic education or postsecondary education.

Months do not count towards a parent's basic or postsecondary 24-month time limit when:

- The parent is age 19 or younger and enrolled in high school or a course of study meeting the standards established by the state superintendent of public instruction for the high school equivalency (see 5.1.2.1)
- The parent is participating in a Wisconsin Works (W-2) placement (see 5.1.3) or Tribal TANF (see 5.1.4) and education is part of their Employability Plan (EP) or Individual Self-Sufficiency Plan (ISP)
- ~~The parent is in an Activity Break Period for their employment but continues to attend classes during the Activity Break Period (see 5.3.1)~~

See the CSAW User Guide – Authorizations for entering dates into the Parent Education Tracking page.

Section 5.3.1 Activity Break Period Eligibility (relevant parts only)

Parents participating in school-year-based approved activities are eligible for a TBRK period while school is not in session if they intend to return to the same approved activity after the break. This includes:

- Parents participating in basic education (see 5.1.2.2), postsecondary education (see 5.1.2.3), or online education (see 5.1.2.4) ~~who are also employed~~
- Teen parents enrolled in high school (see 5.1.2.1)
- Parents employed through a school district
- School bus drivers
- Any other parents whose approved activity is based on the school year

~~Parents participating in basic, postsecondary, or online education who are also employed (Approved Activity Status of EMGE-EMP & APPR BASIC ED or EMTS-EMP & APPR POST SEC ED in CWW), but lose their employment are eligible for an ACTS period.~~

~~Parents who are participating in basic, postsecondary, or online education and are still employed but are no longer working at least 20 hours per calendar month are considered to only be employed (Approved Activity Status of EMPL in CWW). These parents are not eligible for ACTS because they are still working. Although the parent may continue participating in basic, postsecondary, or online education, the parent does not meet the work requirement so the approved activity must be employment (EMPL) rather than EMGE-EMP & APPR BASIC ED or EMTS-EMP & APPR POST SEC ED.~~

~~Parents who experience a decrease in approved activity hours (i.e., no longer qualifying for education as an approved activity) may maintain the same number of authorized hours based on continuity of care (see 17.1.2).~~

Section 7.8 Approved Activity Verification (relevant parts only)

The following are acceptable sources of verification for approved activities:

HSED, GED, or High School: Enrollment letter from school. If a teen parent will remain a dependent child on their parent's case, the local agency must collect written documentation from the education institution which identifies that the student is expected to achieve graduation or its equivalent by their 19th birthday. School schedules are not required for teen parents participating in HSED, GED, or High School.

Basic Education and Postsecondary Education and Employment: Proof of school enrollment and class schedule if classes have set log in times, ~~and employment verification of at least 20 hours per month.~~

~~**Postsecondary Education and Employment:** Proof of school enrollment, class schedule if classes have set log in times, and employment verification of at least 20 hours per month. Work-study is verified by the educational aid package or a letter from the school.~~

Online Education: Proof of school enrollment in basic or postsecondary education, class schedule if there are set log in times, ~~employment verification of at least 20 hours per month,~~ and documentation from the school showing it is an accredited educational institution and provides credit hours for the completed course(s).

CWW: The Child Care Activity Status page in CWW will be enhanced at a future date to include two new Activity Type codes for the stand-alone activities of Basic Education and

Postsecondary Education. Until the new codes are added, agencies must continue to use the following existing Activity Type codes:

- **EMGE – EMP & APPR BASIC ED:** Use this code when the parent is enrolled in basic education, regardless of employment status.
- **EMTS – EMP & APPR POST SEC ED:** Use this code when the parent is enrolled in postsecondary education, regardless of employment status.

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.

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