

Date: June 29, 2026

To: All DMCW, Wellpoint Care Network, and Children's Wisconsin Child Welfare Employees, DCF Human Resources, DCF Office of Legal Counsel

From: Bridget Chybowski, Administrator, Division of Milwaukee Child Welfare

Re: Conflict of Interest regarding employees of DMCW and DMCW contracted Case Management Agencies becoming licensed as out-of-home care providers and placement of Milwaukee County children in their homes

This memo is to provide immediate guidance regarding employees of DMCW and DMCW contracted case management agencies becoming licensed as out-of-home care providers. Also covered is guidance regarding placement of Milwaukee County children in licensed homes of employees. Information in this memo is intended to give written guidance on practices which have previously been implemented more informally and to ensure compliance with DCF 56.04. This is a reminder and request to share with staff and appropriate sections.

For the purposes of this memo, "child welfare employees" are those who are employed by DMCW, contracted Case Management agencies whose positions are partially or fully funded directly by the case management contract (including, but not limited to, child welfare case managers, supervisors, licensing workers, administrative staff, quality improvement/data, etc.) and who work in a capacity where they may influence child/family safety or placement decisions.

Potential conflicts of interest may arise when a child welfare employee, who by virtue of employment or contract, is employed by an agency who under DMCW, has jurisdiction of, or who is responsible for, the placement of children into out-of-home care in Milwaukee County, is also being paid as a placement for a child who is under the care and protection of DMCW. Additionally, there are concerns about public perceptions of impartiality when an agency performing DMCW-designated licensing functions is licensing other child welfare employees. To avoid concerns and potential conflicts of interest, child welfare employees who are also interested in being licensed out-of-home placement providers shall generally do as follows:

- Child welfare employees interested in becoming licensed as Level 1/2 foster parents should seek licensing through a Wisconsin County Human Services Department **other than** DCMW's contracted case management agencies. For example, a child welfare employee may choose to become licensed by a neighboring county's human services department or a child placing agency not contracted with DMCW for case management services.
- Child welfare employees who are licensed foster care providers (any level) **may NOT** take placement of children subject to a TPC/CHIPS Order within Milwaukee County. However, you **may** accept placement of youth under another county's jurisdiction.
- Child welfare employees who wish to be licensed as Treatment Foster Care providers (Level 3-5) should pursue licensing with a treatment foster care agency which does not hold a Case Management contract with DMCW.

In extremely unique situations where deviation from this policy would serve the best interests of an individual child, special permission may be requested and/or granted by the DMCW Child Welfare Program and Policy Section (CWPPS). Any requests for exceptions to the guidance above must be discussed/approved by DMCW CWPPS designee (DCFDMCWProgramandPolicy@wisconsin.gov).

In situations where a child welfare employee is taking placement of a child who is a relative or like-kin, and under a CHIPS order in Milwaukee County, it may not be possible for the child welfare employee to comply with the policy in its entirety. In that situation, the employee or agency representative must reach out to DMCW (DCFDMCWProgramandPolicy@wisconsin.gov), to determine appropriateness and course of action with regard to taking or continuing placement and licensing.

Child welfare employees must notify their employer (program manager) when they accept placement of a youth in a court-ordered out-of-home care placement (does not include voluntary kinship care where they are receiving funds through a DCF-managed benefit or through a family-arranged plan), and they reside in Milwaukee County, regardless of licensed or unlicensed status. DMCW must make every effort to avoid any conflict of interest in handling any potential matters related to the out-of-home placement such as an independent investigation.