To: 
DCF/DMCPS Administrator
DCF Area Administrators
Child Placing Agency Directors
Child Welfare Agency Directors
County Departments of Community Programs Directors
County Departments of Human Services Directors
County Departments of Social Services Directors
Group Home Providers
Tribal Social Service/Indian Child Welfare Directors
Private Child Placing Agencies
Residential Care Center Providers
Shelter Care Providers
Tribal Chairpersons

From: 
Fredi-Ellen Bove
Administrator

Re: 
Wisconsin Safe at Home Address Confidentiality Program – Interim Documentation Guidance

PURPOSE

This memorandum is intended to provide interim guidance to child welfare agencies in documenting addresses in our state’s electronic automated information system (eWiSACWIS) for children and families who notify the county that they are enrolled in the Safe at Home Address Confidentiality Program.

BACKGROUND

The Wisconsin Safe at Home Address Confidentiality Program (“Safe at Home”) is a statewide cost-free address confidentiality program for victims of acts or threats of abuse who fear for their safety or the safety of their child or ward. The program, which is administered by the Wisconsin Department of Justice (DOJ), provides participants with an Assigned Address, which is a forwarding mailing address that they may use for all purposes instead of their Actual Address (defined as the residential street address, school address, or work address, or any portion thereof, of a program participant). The program went into effect on April 1, 2017. The state statute that created Safe at Home, which includes details regarding program eligibility and administration, is Wis. Stat. § 165.68 and is available at https://docs.legis.wisconsin.gov/statutes/statutes/165/68. More information about Safe at Home is available at https://www.doj.state.wi.us/ocvs/safe-home.

INFORMATION SUMMARY

The Safe at Home statute provides that “no state or local agency or unit of government may refuse to use a program participant’s Assigned Address for any official business, unless a specific statutory duty requires the agency or unit of government to use the participant’s Actual Address.” Wis. Stat. § 165.68(5)(b). In addition, the statute provides that “No person who has received notification from a program participant

1) may refuse to use the Assigned Address for the program participant,
2) may require a program participant to disclose his or her Actual Address, or
3) may intentionally disclose to another person the Actual Address of a program participant.”

Counties should consult with their legal representatives with respect to compliance with these provisions of the statute.
DCF is working with the DOJ to determine whether statewide guidance or administrative rules are needed relating to child welfare agencies' and youth justice agencies' work with children, youth, and caregivers in our state's child welfare and youth justice systems who are also participants in Safe at Home. DCF is also working on modifications to the statewide electronic child welfare information system (eWISACWIS) to ensure confidential documentation and storage of address information for Safe at Home participants, which are expected to be implemented in the next year. DCF is also looking at broader implications related to other DCF programs.

In the interim, child welfare agency staff and agency staff providing youth justice services, should document address information of individuals who have indicated they are participants in Safe at Home by doing the following (please see the attached Screenshot Guide for screen-by-screen guidance):

(1) In the Primary Address field in Person Management:
   a. In the first line, enter “c/o Safe at Home”
   b. In the second line, enter the Assigned Address that the individual has provided (this is the mail forwarding address that Safe at Home provides participants)
   c. **Do not enter the individual's Actual Address (the address where he or she actually lives) in any address field in Person Management to ensure that this address does not prefill on forms and is not provided to other individuals.

(2) If you have the individual’s Actual Address, enter a case note:
   a. Select the Type Detail of “Participant Address – Safe at Home”
   b. Enter the following text in the case note:
      i. “This individual/family is a participant in the Safe at Home Address Confidentiality Program. Under state law, his/her/their Actual Address cannot be disclosed.”
      ii. “His/her/their Actual Address is: [CONFIDENTIAL ACTUAL ADDRESS]”
      iii. “The Assigned Address provided to this individual/family by Safe at Home, which is a forwarding mailing address, is documented as this person's primary address in eWISACWIS.”

For individuals who notified child welfare agency staff of their participation in Safe at Home prior to the date of this memorandum, and for whom address information has already been documented in eWISACWIS, agencies should move the Assigned Address to the Primary Address field, as provided above, and the Actual Address (if the child welfare agency has this address) to a case note, as provided above, so that the Actual Address does not appear in any address field that is included in any data reports or on any applicable template documents that are generated using eWISACWIS address information.

Please contact the Central Office Contact listed below for technical assistance.

CENTRAL OFFICE CONTACT: Child Welfare Program and Policy Analyst
Bureau of Safety and Well-Being
(608) 422-6960

MEMO WEB SITE: https://dcf.wisconsin.gov/cwportal/policy

Attachment Link:
Interim Safe at Home Documentation Screenshot Guide