

Division of Safety and Permanence

Child Welfare Licensing Memo 2026-12-lic

Supersedes the following Child Welfare Licensing Memos:  
2012-13L, 2012-14L, 2012-15L, 2012-16L, 2014-11L,  
2014-12L, 2014-13L, 2014-14L, 2020-03L, 2022-10L

April 6, 2026

To: Child Placing Agencies  
Group Home Providers  
Residential Care Center Providers  
Shelter Care Providers

From: John Elliott  
Administrator



**Re: Caregiver Background Check and Employee Update Reporting Requirements**

## PURPOSE

This memo requires all group home providers, residential care center providers, shelter care providers, and child placing agencies to follow a new background check submission process for employees effective April 1, 2026. This memo describes the new process by which providers will submit caregiver background checks and employee updates to the department using a webform and combines previous memos for purposes of efficiency.

## BACKGROUND

Licensed providers are required to conduct a caregiver background check pursuant to Wis. Stat. § 48.685, Wis. Admin. Code Ch. DCF 12, and federal Title IV-E regulations. Under federal law, an agency may claim Title IV-E funding for a child placed in a childcare institution (e.g., group homes, shelters, and other congregate care settings) only if, during the period of the claim, the results of the background checks have been received for all adults working in the facility. Background check requirements apply to both “caregivers” and “congregate care workers.” A caregiver, as defined in Wis. Stat. § 48.685(1)(ag), generally includes individuals who work for or on behalf of an entity and have regular, direct contact with clients, as well as certain licensees and others specified in statute. A congregate care worker, as defined in Wis. Stat. § 48.685(1)(ap), is any adult who works in a congregate care facility, but does not include an unpaid volunteer.<sup>1</sup> All required background checks must be completed in a timely manner to ensure the safety of children in care and to allow the department to claim Title IV-E reimbursement.

As outlined in previous memos, DCF developed the Provider Information Exchange (PIE) and prior background check process to ensure compliance with background check requirements

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<sup>1</sup> Administrative rules related to specific license types may include background check requirements for volunteers. Providers should consult the relevant administrative code provisions to determine any applicable requirements.

and provide a secure portal for submitting employee information. This new process allows background checks to be processed in a more timely manner.

DCF piloted a new background check procedure in September 2025 to help ensure caregiver background checks are completed within a few days after a provider submits new applicant information and before the applicant is hired, with minimal delay to the hiring process. A new webform was created for providers to submit the following information to DCF:

- Notification of a new applicant the provider intends to hire, triggering DCF to:
  - run a Child Abuse and Neglect (CAN) background check on the applicant, and
  - retrieve and review the applicant's fingerprint-based FBI background check.
- Documentation of required criminal and caregiver background checks completed by the provider; and
- Employee-specific updates, including hire and termination dates.

The pilot group provided feedback, and DCF made changes to maximize process efficiency. A second group of providers was trained and began the new procedure on February 1, 2026. The final group of providers will be trained and will begin the new procedure on April 1, 2026.

## INFORMATION SUMMARY

### Reporting Caregiver Background Checks to the Department:

**Effective April 1, 2026**, all group homes, residential care centers for children and youth, shelter cares, and child placing agencies **must use the new webform reporting system** for caregiver background checks sent to DCF. Providers will complete the [Child Welfare Licensing Congregate Care Worker Update](#) form as Step 4 of the background check procedure described below. The webform requires providers to upload information and documents pertaining to background checks and employment changes for the following update scenarios:

- **New Applicant:** This option is intended for potential hires only. Providers must submit information about each potential hire via the webform prior to their start date. Providers must wait to be informed whether the new applicant has a bar to employment prior to their start date. If there is no bar to employment, the provider may proceed with employment and must then enter the new applicant as a New Employee.
- **New Employee:** This option is intended for providing the actual hire date for a previously submitted applicant or new employee. This option might also be used to upload any missing background check documents for previously reported applicants.
- **Existing Employee:** This option is used for already existing employees if they have had a name change, when renewing background checks, if corrections are needed on their background checks, or if the employee will be assigned to work at a new facility.
- **Employment Ended:** This option is used to report an employee's work end date.
- **Applicant Not Hired:** This option is intended to be used when a new applicant that was previously entered was not hired.

Each update type, if required, will prompt the provider to upload the appropriate caregiver background check documents, which may include a PDF of the BID, DOJ/IBIS results, an out of state check, a rehabilitation review decision, and additional information related to the applicant or employee.

Once the form is submitted, DCF staff will review the uploaded documents and contact the provider if changes or updates are needed. Within approximately one week of submitting a completed form and required documents, the provider will receive an email notifying them whether the applicant or employee has a bar to employment. If no bar to employment is identified, the provider may proceed with employment.

Please see the attached procedure for more detailed information about submitting the webform.

### **Conducting a Caregiver Background Check**

The steps below detail how to complete the background check process.

**Step 1:** Each licensed provider is required to have all potential applicants or employees complete a Background Information Disclosure (BID) form ([DCF-F-2978-E](#)). The provider shall review the BID form to confirm it is complete and properly signed and dated by the applicant or employee.

- If an individual checks “yes” to any question in Section A of the BID form, the provider must review the information to determine whether it affects the individual’s eligibility for employment under Wis. Stat. § 48.685. A “yes” response does not necessarily mean the individual is barred from employment or requires a rehabilitation review. Providers must evaluate whether the information results in a bar under Wis. Stat. § 48.685(4m)(b)1. to 5. Information regarding rehabilitation reviews can be found at <https://dcf.wisconsin.gov/rehab-review>

**Step 2:** The licensed provider uses the information from the BID form to submit a name-based caregiver background check through the Department of Justice (DOJ) through the Wisconsin Online Record Check System (WORCS). Each provider is required to maintain a WORCS account. Results of the name-based check will be uploaded to the WORCS website by DOJ. The provider is responsible for maintaining the results from the WORCS website in the applicant or employee’s personnel file. Results will include the DOJ check as well as the Caregiver Background Check – Governmental Findings (formerly known as IBIS) from the Department of Health Services. The provider has 45 days in which to conduct the name-based caregiver background check with the DOJ.

**Step 3:** Licensed providers are required to review the name-based checks and compare the results to the list of barred offenses to determine whether a person is eligible for employment. The list of barred offenses can be found on the following website:  
<https://dcf.wisconsin.gov/files/cwlicensing/pdf/cwbarredcrimes.pdf>

If the BID form or name-based check results show a criminal history that is not on the barred offenses list, the provider must determine and document whether the offense is substantially related to the care of a client or the activities of a program, in accordance with Wis. Admin. Code § DCF 12.06. Chapter DCF 12 can be found at the following website:  
[https://docs.legis.wisconsin.gov/code/admin\\_code/dcf/001\\_020/12](https://docs.legis.wisconsin.gov/code/admin_code/dcf/001_020/12)

**Note:** [Form DCF-F-5160-E](#), “Caregiver Background Checks Substantially Related Investigation Report for Child Welfare Agencies” may be used to document compliance with DCF 12.06(3).

**Step 4:** The licensed provider submits the BID, DOJ results, and IBIS results via the [Child Welfare Licensing Congregate Care Worker Update](#) form.

**Step 5:** Each applicant must submit a fingerprint scan for an FBI background check.

- The applicant must register for an appointment at a local Fieldprint office. Locations and registration information can be found online at the following website: <https://fieldprintwisconsin.com/>. DCF will provide each facility with a letter that must be used by each applicant to schedule an appointment with the Fieldprint office. This letter contains the Fieldprint code which must be used when scheduling an appointment.
- After registering with Fieldprint, the applicant must bring the confirmation page from the Fieldprint website and two forms of valid identification to the Fieldprint office.
- Applicants will not be charged by Fieldprint.
- Fieldprint will scan and send the applicant or employee’s fingerprints to the DOJ for processing. Results of the fingerprint scans are shared directly with DCF. The applicant or employee and the facility will not receive the results.

**Step 6:** DCF will process the results of the fingerprint scan for each applicant and run the CAN check. DCF will compare the BID form to the fingerprint and CAN check results, and if any information is identified that is not listed on the BID form, DCF will notify both the licensed provider and the applicant or employee.

**Step 7:** Once DCF has received a complete and accurate BID, the DOJ and IBIS results, and the fingerprint and CAN check results, DCF will notify the licensed provider by email of the outcome.

- If DCF determines that the results identify a bar to employment, the provider will be notified that the applicant may not be employed unless a rehabilitation review is completed and approved. The applicant will receive a separate letter with information about the bar and instructions for completing a rehabilitation review.
- If DCF determines that no bar to employment exists, the provider will be notified that the applicant may proceed with employment and may establish a start date.

**Note:** The applicant may not begin employment with the facility until the licensed provider receives the notification from DCF that all background checks have been completed.

**Step 8:** Licensed providers must repeat Steps 1-7 at least every 4 years for all caregivers and congregate care workers, in accordance with Wis. Stat. § 48.685(3)(b).

**Note:** Failure to comply with caregiver background check requirements may result in enforcement action under Wis. Stat. § 48.715, and may impact the department’s ability to claim Title IV-E funding.



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MEMO WEB SITE:

<https://dcf.wisconsin.gov/cwportal/policy>

ATTACHMENTS:

[Quick Guide for Background Check Reporting Requirements](#)