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State of Wisconsin
Governor Scott Walker



TO: **W-2 Agencies**
Training Staff

FROM: Margaret McMahon, Director
Bureau of Working Families
Division of Family and Economic Security
Department of Children and Families

BWF OPERATIONS MEMO

No: 17-06

DATE: 04/05/2017

W-2	<input checked="" type="checkbox"/>	EA	<input type="checkbox"/>	CF	<input type="checkbox"/>
JAL	<input type="checkbox"/>	RAP	<input type="checkbox"/>	Other EP	<input type="checkbox"/> *

SUBJECT: Impact of Wisconsin Shares Child Care Subsidy Changes on Wisconsin Works (W-2) Activity Assignment

CROSS REFERENCE: W-2 Manual Sections [6.1.1](#); [6.2.1](#); [6.2.3](#); [6.3.1](#); [7.5.2](#); [14.3.1](#); [14.3.2](#);
Wisconsin Shares Child Care Subsidy Program Policy Manual Sections [1.9.1](#); [Chapter 2](#);
[WI Shares Child Care Subsidy Changes: What Parents Need to Know](#);
Wisconsin Shares Operations Memo [17-10](#)

EFFECTIVE DATE: Immediately

PURPOSE

1. Reiterate the policy changes to the Wisconsin Shares Child Care Subsidy Program regarding the new Electronic Benefits Transfer (EBT) payment initiative called MyWICChildCare that impact Wisconsin Works (W-2) participants who also participate in Wisconsin Shares.
2. Provide information on how Child Care (CC) subsidy amounts are determined by CC workers using Employability Plans (EPs) and actions that Financial and Employment Planners (FEPs) should take to ensure accurate subsidy authorizations.
3. Reiterate the time frame required for parents to report changes in circumstances that may impact their Wisconsin Shares eligibility or authorization to their CC worker so that FEPs can help participants prevent gaps in their child care authorizations.

BACKGROUND

The WI Shares Child Care Subsidy Program provides W-2 participants subsidies to pay for a portion of their child care costs so parents can engage in job search and work experience activities. Recently, the Department of Children and Families, Division of Early Care and Education made changes to the CC subsidy payment system to empower parents to become more involved in selecting the best child care program for their children and to promote a business relationship between parents and providers. These changes impact the way work activity schedules are used to authorize child care.

WISCONSIN SHARES CHILD CARE POLICY CHANGES

This section compares some of the old and new Wisconsin Shares CC policies that are relevant to FEPs. FEPs should refer to Wisconsin Shares Operations Memo [17-10](#) and Wisconsin Shares Child Care Subsidy Policy Manual [Chapter 2](#) for the complete list of new Wisconsin Shares Child Care Subsidy Program policies.

Previous Policy	New Policy
CC authorizations could be backdated to the beginning of the month the participant applied for child care.	CC authorizations can only be backdated to the date the W-2 participant applied for child care, so long as all other policy requirements are met.
Child care providers were informed of the authorized hours and the total weekly subsidy amount for each child with an authorization to their program.	Child care providers no longer receive notification of the number of hours of care authorized or the total subsidy amount for children with authorizations to their programs. Parents can share this information with their child care providers at their own discretion.
After child care was provided, the child care provider submitted an attendance report, with the number of hours the child attended the program, to DCF/DECE for reimbursement.	Attendance reporting to DCF/DECE from the child care provider is no longer required because payment is based on CC authorization and loaded onto an EBT card at the beginning of each month. Parents initiate payment to providers. DCF/DECE no longer reimburses providers directly.
Child care providers were responsible for reporting attendance for additional hours of care due to scheduled and unscheduled school closures under School Bank hours.	Child care providers no longer request additional hours of care. Parents are responsible for requesting specific days of additional hours of care for scheduled and unscheduled (inclement weather) school closures. The request must be made to their CC worker within 10 calendar days of the need so funds can be added to cover additional hours of care. (For more information, see FEP ACTIONS below)
DCF/DECE reimbursed the provider directly after child care was provided.	CC subsidy benefits are loaded onto an EBT card at the beginning of each month before care is given. Parents and providers determine the timing of payments. (For more information, see

<p>Parents could not change child care providers mid-week because authorizations started on Sunday and ended Saturday. They could change beginning on Sunday for the following week. Attendance records were verified to check for accuracy and child care providers were paid retrospectively.</p>	<p>FEP ACTIONS below)</p> <p>Parents cannot change child care providers mid-month because child care subsidies are loaded onto the EBT card at the beginning of the month. Parents making a provider change mid-month may have to cover the entire cost of child care paid to the new provider because the authorization to a new child care provider does not take effect until the first of the following month. All provider changes must be approved by DCF/DECE. (For more information, see FEP ACTIONS below)</p>
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FEP ACTIONS DUE TO CHILD CARE POLICY CHANGES

1. Provide specifics on the EP when scheduling activities

CC subsidy amounts are now loaded onto EBT cards prior to the first of the month based on the participant’s specific schedule of activities and child care needs. The Wisconsin Shares Child Care Subsidy Program Policy Manual Section [2.2.7](#) lists the assessment that CC workers use to determine authorizations. Although FEPs do not determine child care authorizations, they should be aware of these considerations when helping participants with their schedules. Section [2.2.8.1](#) states that the number of hours assigned for activities should correlate with the number of hours indicated in the schedule. CC workers will use the schedule of days and times to determine the number of authorized hours for CC assistance. While W-2 participants are assigned a specific number of activity hours per week in their EPs, they are not necessarily assigned hours on a specific day or at a specific time.

FEP Action: FEPs should be as specific as possible when assigning activities in the participant’s EP. When assigning the weekly number of hours that a participant must participate in a work activity, the FEP should also include the specific day and time of the activity, whenever possible, including assigning a specific day and time for weekly scheduled medical appointments, even when it may vary from week to week.

Example: Leo is assigned 10 hours of general education classes, 9 hours of employment search, and 5 hours of medical appointments each week, totaling 24 hours of assigned activities weekly. Leo’s GED schedule does not change weekly. His medical and job search schedule may change from week to week.

Times	Monday	Tuesday	Wednesday	Thursday	Friday
8am					
9am		GED Class	GED Class	GED Class	Dr. Appt
10am		GED Class	GED Class	GED Class	Dr. Appt
11am		GED Class	Job Search	GED Class	Dr. Appt
12pm					
1pm		GED Class	Dr. Appt	GED Class	Job Search
2pm		Job Search	Dr. Appt	Job Search	Job Search
3pm		Job Search	Job Search	Job Search	Job Search

2. Include travel time on the EP

Travel time from the child care location to approved activities and between approved activities, including time for medical appointments, may be authorized for child care as long as there is no other member in the assistance group available to provide care for the child and the gap time between activities does not exceed two hours (see WI Shares Manual [2.2.8.6](#)).

FEP Action: FEPs should indicate the need for child care during travel times in the comments section of the EP so that CC workers are aware and can discuss in detail with participants their travel time needs. CC workers will determine specific travel time for the W-2 participant's activities when assessing the CC authorization.

Example:

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WPAS                EMPLOYABILITY SERVICE PLAN - 2                02/23/17 14:50

PIN: 0123456789    OFFICE: 0123    EP WORKER: XXXXXX    PRINTER-ID: XXXXXXXX
NAME: EXAMPLE     KIM                COUNTY/TRIBAL UNIT: 00
*** LAST EMPLOYABILITY PLAN UPDATE:01/16/17    CASE MANAGER: XXXXXXXX
ACTIVITY PLAN: (6 MONTHS MAXIMUM) 02 23 2017    THRU 05 31 2017
  ACTION STEPS OR          PLANNED    PLANNED    PROV    PROV    ACTUAL
  ACTIVITY                BEG DATE  END DATE  ID     OTR    END DATE
1 GED CLASSROOM WORK          02 23 17  05 31 17  0043    ___    ___    ___
  HRS/WK: 05 REM: SCHEDULE ATTACHED          CC: Y TRNS: Y OTR: ___    ___    ___
  DEL: ___ LOCN: JOB CENTER/RESOURCE ROOM          PD:
2 EMPLOYMENT SEARCH          02 23 17  05 31 17  0043    ___    ___    ___
  HRS/WK: 05 REM: SCHEDULE ATTACHED          CC: Y TRNS: Y OTR: ___    ___    ___
  DEL: ___ LOCN: CONTACT EMPLOYERS DIRECTLY          PD:
3 WORK EXPERIENCE          02 23 17  05 31 17  0043    ___    ___    ___
  HRS/WK: 25 REM: TO BUILD OFFICE SKILLS          CC: Y TRNS: Y OTR: ___    ___    ___
  DEL: ___ LOCN: COMMUNITY COALITION OFFICE          PD:
  MAILED (Y/N): Y MAILED DT: 02 23 2017 SAVE EP IN HISTORY: Y

COMMENTS: AVERAGE NUMBER OF ACTIVITIES HOURS PER WEEKDAY IS 7. ALSO NEEDS 1.5 HOURS
OF TRAVEL IN BETWEEN ACTIVITIES. ACTIVITIES MUST BE COMPLETED BETWEEN 6:00
A.M. AND 5:30 P.M. DAILY, SO CAN RETURN TO PICK UP CHILD BEFORE CHILD CARE
CLOSES AT 6:00 P.M. WILL MEET WITH FEP WEEKLY ON TUESDAYS WHEN IN THE JOB
CENTER. DETAILED DAILY SCHEDULE ATTACHED.

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3. Understand CC provider availability when assigning activities

CC authorizations are determined based on the time the parents' approved activity schedules overlap with the stated child care need and the business hours of the child care provider.

FEP Action: In addition to entering specific days and times into the EP for the participant's activities, FEPs should also discuss with the participant the child care provider's hours of operation. Assigned activities should be aligned with the provider's hours of operation whenever possible and the participant must be made aware that any activities completed outside of the child care provider's hours of operation will not be included in the CC authorization.

Example: Shelly is assigned 10 hours of job search each week. Her schedule for job search is two hours each weekday. She tells her FEP that she wants to do job search from 5:00 p.m. to 7:00 p.m. The FEP indicates this on her schedule. Her child care provider is only open from 6:00 a.m. to 6:00 p.m. The hour between 6:00 p.m. and 7:00 p.m. will not be authorized because her child care provider is only open until 6:00 p.m. If Shelly needs child care for this entire activity, she needs to ensure that activity hours are planned within the business hours of her child care provider.

4. Understand how planned and unplanned changes in CC circumstances impact W-2 participants

Participants receiving CC assistance must report any changes in circumstances to the CC agency within 10 calendar days after the change if the change may affect CC eligibility or the authorization. This includes unscheduled school closures for inclement weather. Parents should not switch from one provider to another mid-month (see WI Shares Manual section [2.2.14](#)) except in hardship situations. Changes regarding hours of care or the child care provider should be reported 30 days before the change. Change of child care providers mid-month and after the EBT card has been loaded for the month is only allowed at the determination of Department of Children and Families, Division of Early Care and Education for hardship reasons as indicated in WI Shares Manual section [2.2.12](#). Parents changing child care providers mid-month may have to pay for child care costs on their own until the authorization to the new provider starts on the first of the next month.

FEP Action: In order to prevent gaps in child care eligibility and authorization, FEPs should be aware of how this policy affects a participant's child care needs when there is a change in the participant's life situation.

Example: Lisa's CC authorization for her son is 15 hours per week. Last Friday, there was early release at school due to a snowstorm and her son attended daycare an additional three hours. Lisa informs her CC worker the following Monday to have the additional amount added so she can pay her child care provider.

Example: Ben's daughter attends ABC Daycare. Recently, he learned about a new child care center called 123 Daycare. Ben now wants his daughter to go to 123 Daycare. It is the middle of the month, but Ben decides to switch his daughter from ABC Daycare to 123 Daycare. Because it is the middle of the month and this is not a hardship reason, this change cannot be authorized to take effect until the first of the following month. Ben has to pay out-of-pocket for the two remaining weeks of the current month for his daughter to attend 123 Daycare.

CARES WORKER WEB (CWW)

There are no changes to CWW.

AGENCY ACTION

W-2 agencies should ensure that FEPs are aware of these CC policy changes and the actions that they should be taking as a result. Training is being evaluated and will be updated to reflect these updates. To view trainings available on EPs, FEPs can go to the [PTT Learning Center](#).

RESOURCES

Wisconsin Shares

<https://dcf.wisconsin.gov/wishares>
<https://dcf.wisconsin.gov/wishares/parents>

MyWIChildCare

<https://dcf.wisconsin.gov/mywichildcare>

CONTACTS

For W-2 Policy Questions in the Balance of State: Bureau of Regional Operations, W-2 Regional Coordinators

For W-2 Policy Questions in Milwaukee: Milwaukee Operations Section Regional Administrators

For W-2 CARES Processing Questions: W-2 Help Desk

For Wisconsin Shares Child Care policy questions outside of Milwaukee County contact your Bureau of Regional Operations (BRO), CC Coordinators at

<https://dcf.wisconsin.gov/files/regionaloperations/pdf/bro-contacts.pdf>

DCF/DFES/BWF/CH