

OMB Control No: 0970-0114

Expiration date: 03/31/2027

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**Appendix 1: Lead Agency Implementation Plan  
for**

**State/Territory Wisconsin**

**FFY 2025 – 2027**

**Version: Initial Plan**

**Plan Status: Approved as of 2024-11-09 00:25:06 GMT**

For each non-compliance, Lead Agencies must describe the following:

- Action Steps: List the action steps needed to correct the finding (e.g., update policy manual, legislative approval, IT system changes, etc.).
- Expected Completion Date: List the expected completion date for the action step.
- Overall Target Date for Compliance: List date Lead Agency anticipates completing implementation, achieving full compliance with all aspects of the findings. (Note: Compliance will not be determined until the FFY 2025-2027 CCDF Plan is amended and approved).

## ELIGIBILITY AND ENROLLMENT: CONTINUITY OF CARE (12-MONTH ELIGIBILITY)

Reason(s) for non-compliance:

- The Lead Agency does not always provide a minimum 12-month eligibility period for each child, as required by 98.21(a)(1). (Plan Questions 2.5.2a and 2.5.2c)
- The Lead Agency does not appropriately allow temporary changes in work, training, or education status, as required by 98.21(a)(1)(ii)(A), 98.21(a)(1)(ii)(B), and 98.21(a)(1)(ii)(C). (Plan Question 2.5.2b)

Overall Target Completion Date:

Action Step Number	Action Step Description	Target Completion Date
1	12-month eligibility Administrative Rule Change – 201.039(11)	April 2026
2	12-month eligibility and authorization electronic system enhancements	June 2026
3	12-month eligibility Wisconsin Subsidy Handbook update	July 2026
4	12-month eligibility statewide policy implementation and training	July 2026
1	Temporary changes in activities Administrative Rule changes – 201.02(21), 201.037(1), 201.039(2g)(c)(d)	April 2026
2	Temporary changes in activities eligibility and authorization electronic system enhancements	July 2026
3	Temporary changes in activities Wisconsin Subsidy Handbook update	July 2026

## EQUAL ACCESS: AFFORDABILITY

Reason(s) for non-compliance:

- The Lead Agency does not limit all family copayments to seven percent or less of family income, as required by 98.45(l)(3). (Plan Question 3.1.1a). Please note the Lead Agency has requested a waiver for this requirement that is currently under review.
- The Lead Agency does not include the rationale for the policy to allow providers to charge families additional amounts above the required co-payment, including required data and a demonstration of how the policy promotes affordability and access for families, as required by 98.45(d)(2)(ii). (Plan Questions 3.1.2ei and 3.1.2eii)

**Overall Target Completion Date:**

Action Step Number	Action Step Description	Target Completion Date
1	Update WI State Plan to provide additional information on rationale for the policy to allow providers to charge families additional amounts above the required co-payment.	August 2025
1	7% Copayment requirement Wisconsin Statutory change – 49.155(1m) inclusion in WI Biennial Budget	July 2025
2	7% Copayment requirement Wisconsin Administrative Rule change – 201.08	April 2026
3	7% Copayment requirement system changes	June 2026
4	7% Copayment requirement Wisconsin Shares Handbook updates	July 2026
5	7% Copayment requirement statewide policy implementation and training	July 2026

**EQUAL ACCESS: PAYMENT RATES****Reason(s) for non-compliance:**

- The Lead Agency's payment rates for infants in family child care homes, preschoolers in center-based care, and infants in center-based care are not sufficient to ensure equal access, as required by 98.45(a). (Plan Question 4.3.2a)

**Overall Target Completion Date:**

Action Step Number	Action Step Description	Target Completion Date
1	Payment Rates – Review of existing Wisconsin State statutes for enhanced payment types and rates for infants, toddlers, and preschool children.	March 2025
2	Payment Rates – Review of existing Administrative Rules for enhanced payment types and rates for infants, toddlers, and preschool children.	March 2025
3	Payment Rates – Anticipated passage of the 2025-2027 WI biennial budget with additional funding for subsidy rate adjustment	July 2025
4	Payment Rates – Identification of necessary system enhancements	September 2025
5	Payment Rates – Wisconsin Shares Handbook updates	November 2025
6	Payment Rates – statewide policy implementation and training	January 2026

## **EQUAL ACCESS: PROVIDER OPTIONS FOR PARENTS**

### **Reason(s) for non-compliance:**

- The Lead Agency does not provide grants or contracts for direct services for infants and toddlers, for children in underserved geographic areas, and for children with disabilities, as required by 98.30(b)(1). (Plan Question 4.5.1i). Please note the Lead Agency has requested a waiver for this requirement that is currently under review.

### **Overall Target Completion Date:**

<b>Action Step Number</b>	<b>Action Step Description</b>	<b>Target Completion Date</b>
<b>1</b>	Grants and Contracts - Review UMOS, 53206, and WI Shares Inclusion Rate programs to recommend updates as needed.	March 2025
<b>2</b>	Grants and Contracts – Get approval for UMOS, 53206, and WI Shares Inclusion Rate selected programmatic changes.	April 2025
<b>3</b>	Grants and Contracts – Implement & communicate approved UMOS, 53206, and WI Shares Inclusion Rate programmatic changes.	July 2025
<b>4</b>	Submit evidence of compliance	August 15, 2025
<b>5</b>	Submit state plan amendment	August 31, 2025

## **EQUAL ACCESS: SUPPLY BUILDING STRATEGIES**

### **Reason(s) for non-compliance:**

The Lead Agency does not adequately describe strategies to improve the supply and quality of child care for children with disabilities and child care during non-traditional hours, as required by 98.16(y) and (aa). (Plan Questions 4.5.4c and 4.5.4d)

### **Overall Target Completion Date:**

<b>Action Step Number</b>	<b>Action Step Description</b>	<b>Target Completion Date</b>
<b>1</b>	Supply Building – Review of existing Wisconsin State statutes for enhanced payment options for children with disabilities or needing non-standard hour care.	March 2025
<b>2</b>	Supply Building – Review of existing Administrative Rules for enhanced payment options for children with disabilities or needing non-standard hour care.	March 2025
<b>3</b>	Supply Building – Identification of necessary system enhancements	May 2025
<b>4</b>	Supply Building – Wisconsin Shares Handbook updates	June 2025
<b>5</b>	Supply Building – statewide policy implementation and training	August 2025

## HEALTH AND SAFETY: ONGOING TRAINING

Reason(s) for non-compliance:

- The Lead Agency does not have requirements for ongoing training on health and safety standards for licensed child care centers, as required by 98.44(b)(2)(i). (Plan Question 5.6.1a)

The Lead Agency does not require an annual unannounced inspection for licensed child care centers for compliance with ongoing training requirements, as required by 98.42(b)(2)(i)(B). (Plan Question 5.5.1a ii)

Overall Target Completion Date:

Action Step Number	Action Step Description	Target Completion Date
1	Go through rule promulgation process to update WI Administrative rules WI 202, 250, 251, 252	April 2026
2	WISCCRS & Licensing Checklist Mobile App Enhancements Completed and Updates to the Certification Standards and Checklist	June 2026
3	Publication and Implementation of the Rules	July 2026

## HEALTH AND SAFETY: POSTING INSPECTION REPORTS

Reason(s) for non-compliance:

- The Lead Agency does not post full monitoring and inspection reports that include all areas of compliance and non-compliance for all providers as required by 98.33(a)(4)(ii). (Plan Question 5.5.4a). Please note the Lead Agency has requested a waiver for portions of this requirement that is currently under review.

Overall Target Completion Date:

Action Step Number	Action Step Description	Target Completion Date
1	Child Care Finder Requirements Gathering – tool should display all rules monitored and inspection reports for a monitoring visit.	December 2024
2	Child Care Finder System Development	July 2025
3	Enhanced Child Care Finder Deployed and Statewide Communication and Training Implemented	September 2025

**LEAD AGENCY RESPONSIBILITIES: PROGRAM ADMINISTRATION, PLAN DEVELOPMENT, AND PROGRAM/FUNDING COORDINATION**

Reason(s) for non-compliance:

- The Lead Agency's Statewide Disaster Plan does not include all required elements, as required by 98.16(dd)(2)(iii). (Plan Questions 8.5.1bv and 8.5.1bvii)

Overall Target Completion Date:

Action Step Number	Action Step Description	Target Completion Date
1	The Lead Agency has developed a Child Care Disaster Preparedness Plan and through collaboration with the Child Care State Capacity Building Center, is finalizing the document.	February 2025

**QUALITY IMPROVEMENT AND SUPPORT FOR CHILD CARE WORKFORCE: PROFESSIONAL DEVELOPMENT**

Reason(s) for non-compliance:

- The Lead Agency does not have an annual requirement for a minimum number of hours of ongoing professional development for all licensed child care centers, as required by 98.44(b)(2). (Plan Question 6.3.1a)

Overall Target Completion Date:

Action Step Number	Action Step Description	Target Completion Date
1	Go through rule promulgation process to update WI Administrative rules WI 252	April 2026
2	WISCCRS & Licensing Checklist Mobile App Enhancements Completed	June 2026
3	Statewide Policy Implementation Communication and Training	July 2026

## HEALTH AND SAFETY: BUILDING AND PHYSICAL PREMISES SAFETY

### Reason(s) for non-compliance:

- The Lead Agency standard for building and physical premises safety does not include the identification of and protection from vehicular traffic for out-of-school programs, as required by 98.41(a)(1)(v). (Plan Question 5.3.5cvii)
- The Lead Agency does not require all staff in licensed centers or licensed family child care homes to complete pre-service or orientation training within three months on building and physical premises safety, as required by 98.44(b). (Plan Question 5.4.1m)
- The Lead Agency does not require an annual unannounced inspection for licensed centers for compliance with a standard for identification and protection from vehicular traffic. Additionally, the Lead Agency does not require an annual unannounced inspection for licensed centers or licensed family child care homes for compliance with pre-service or orientation training requirements related to building and physical premises safety, as required by 98.42(b)(2)(i)(B). (Plan Questions 5.5.1aii and 5.5.1bii)

### Overall Target Completion Date:

Action Step Number	Action Step Description	Target Completion Date
1	Go through rule promulgation process to update WI Administrative rules WI 202, 250, 251, 252	April 2026
2	WISCCRS & Licensing Checklist Mobile App Enhancements Completed and Updates to the Certification Standards and Checklist	June 2026
3	Statewide Policy Implementation Communication and Training	July 2026

## HEALTH AND SAFETY: EMERGENCY PREPAREDNESS AND RESPONSE PLANNING

### Reason(s) for non-compliance:

- The Lead Agency standard for emergency preparedness and response planning does not include all the required elements for licensed centers, licensed family child care homes, license-exempt centers, license-exempt family child care, or out-of-school programs, as required by 98.41(a)(1)(vii). (Plan Questions 5.3.7v, 5.3.7vi, 5.3.7ix, and 5.3.7x)

The Lead Agency does not require pre-service or orientation training on emergency preparedness and response planning for licensed centers and does not require pre- service or orientation training within three months on emergency preparedness and response planning for licensed family child care homes, as required by 98.44(b)(1)(i). (Plan Question 5.4.1g)

- The Lead Agency does not require an annual unannounced inspection for licensed centers or licensed family child care providers or an annual inspection for license- exempt centers or license-exempt family child care providers for compliance with a standard for emergency preparedness and response planning, as required by 98.42(b)(2)(i)(B) and 98.42(b)(2)(ii). Additionally, the Lead Agency does not require an annual unannounced inspection for licensed centers or licensed family child care providers for compliance with related pre-service or

orientation training requirements, as required by 98.42(b)(2)(i)(B). (Plan Questions 5.5.1aii, 5.5.1bii, 5.5.2ai, and 5.5.2bi)

**Overall Target Completion Date:**

Action Step Number	Action Step Description	Target Completion Date
1	Go through rule promulgation process to update WI Administrative rules WI 202, 250, 251, 252	April 2026
2	WISCCRS & Licensing Checklist Mobile App Enhancements Completed and Updates to Certification Standards and Checklist	June 2026
3	Statewide Policy Implementation Communication and Training	July 2026

## **HEALTH AND SAFETY: HANDLING AND STORAGE OF HAZARDOUS MATERIALS AND DISPOSAL OF BIOCONTAMINANTS**

**Reason(s) for non-compliance:**

- The Lead Agency does not require all staff in licensed centers or licensed family child care homes to complete pre-service or orientation training within three months on handling and storage of hazardous materials and disposal of biocontaminants, as required by 98.44(b). (Plan Question 5.4.1m)
- The Lead Agency does not require an annual unannounced inspection for licensed centers or licensed family child care homes for compliance with pre-service or orientation training requirements related to handling and storage of hazardous materials and disposal of biocontaminants, as required by 98.42(b)(2)(i)(B). (Plan Questions 5.5.1aii and 5.5.1bii)

**Overall Target Completion Date:**

Action Step Number	Action Step Description	Target Completion Date
1	Go through rule promulgation process to update WI Administrative rules WI 202, 250, 251, 252	April 2026
2	WISCCRS & Licensing Checklist Mobile App Enhancements Completed and Updates to Certification Standards and Checklist	June 2026
3	Statewide Policy Implementation Communication and Training	July 2026

## **HEALTH AND SAFETY: PEDIATRIC FIRST AID AND PEDIATRIC CPR**

**Reason(s) for non-compliance:**

- The Lead Agency has not established a standard for pediatric first aid for all staff for licensed centers, licensed family child care homes, license-exempt centers, license- exempt family child care homes, or out-of-school programs, as required by 98.41(a)(1)(x). (Plan Questions 5.3.10ai, 5.3.10aii, 5.3.10aiv, 5.3.10av, and 5.3.10avii)



- The Lead Agency does not require pre-service or orientation training on pediatric first aid for licensed centers, licensed family child care providers, license-exempt centers, or license-exempt family child care providers, as required by 98.44(b)(1)(i). (Plan Question 5.4.1j)
- The Lead Agency does not require an annual unannounced inspection for licensed centers or licensed family child care homes or an annual inspection for license-exempt centers or license-exempt family child care homes for compliance with a standard for pediatric first aid and with related pre-service or orientation training requirements, as required by 98.42(b)(2)(i)(B) and 98.42(b)(2)(ii). (Plan Questions 5.5.1aii, 5.5.1bii, 5.5.2ai, and 5.5.2bi)

**Overall Target Completion Date:**

Action Step Number	Action Step Description	Target Completion Date
1	Go through rule promulgation process to update WI Administrative rule to include pediatric reference WI 202, 250, 251, 252	April 2026
2	WISCCRS & Licensing Checklist Mobile App Enhancements Completed and Update to Certification Standards and Checklist	June 2026
3	Statewide Policy Implementation Communication and Training	July 2026

## **HEALTH AND SAFETY: PREVENTION AND CONTROL OF INFECTIOUS DISEASES**

**Reason(s) for non-compliance:**

The Lead Agency does not require all staff in licensed centers or licensed family child care homes to complete pre-service or orientation training within three months on the prevention and control of infectious diseases (including immunizations), as required by 98.44(b). (Plan Question 5.4.1m)

- The Lead Agency does not require an annual unannounced inspection for licensed centers or licensed family child care homes for compliance with pre-service or orientation training requirements related to the prevention and control of infectious diseases (including immunizations), as required by 98.42(b)(2)(i)(B). (Plan Questions 5.5.1aii and 5.5.1bii)

**Overall Target Completion Date:**

Action Step Number	Action Step Description	Target Completion Date
1	Provide evidence to OCC to confirm compliance.	January 2025
2	Submit state plan amendment with evidence of compliance.	August 2025

## HEALTH AND SAFETY: ADMINISTRATION OF MEDICATION

### Reason(s) for non-compliance:

- The Lead Agency does not require all staff in licensed centers or licensed family child care homes to complete pre-service or orientation training within three months on administration of medication, as required by 98.44(b). (Plan Question 5.4.1m)
- The Lead Agency does not require an annual unannounced inspection for licensed centers or licensed family child care homes for compliance with pre-service or orientation training requirements related to the administration of medication, as required by 98.42(b)(2)(i)(B). (Plan Questions 5.5.1aii and 5.5.1bii)

### Overall Target Completion Date:

Action Step Number	Action Step Description	Target Completion Date
1	Provide evidence to OCC to confirm compliance.	January 2025
2	Submit state plan amendment with evidence of compliance.	August 2025

## HEALTH AND SAFETY: CHILD DEVELOPMENT

### Reason(s) for non-compliance:

- The Lead Agency does not require pre-service or orientation training on child development for licensed centers, and does not require pre-service or orientation training within three months on child development for licensed family child care homes, as required by 98.44(b)(1)(iii). (Plan Question 5.4.1l)
- The Lead Agency does not require an annual unannounced inspection for licensed centers and licensed family child care providers for compliance with pre-service or orientation training requirements related to child development, as required by 98.42(b)(2)(i)(B). (Plan Questions 5.5.1aii and 5.5.1bii)

### Overall Target Completion Date:

Action Step Number	Action Step Description	Target Completion Date
1	Provide evidence to OCC to confirm compliance.	January 2025
2	Submit state plan amendment with evidence of compliance.	August 2025

## HEALTH AND SAFETY: IDENTIFICATION AND REPORTING OF CHILD ABUSE

### Reason(s) for non-compliance:

- The Lead Agency does not require all staff in licensed centers or licensed family child care homes to complete pre-service or orientation training within three months on the identification and reporting of child abuse, as required by 98.44(b). (Plan Question 5.4.1m)
- The Lead Agency does not require an annual unannounced inspection for licensed centers or licensed family child care homes for compliance with pre-service or orientation training requirements related to the identification and reporting of child abuse, as required by 98.42(b)(2)(i)(B). (Plan Questions 5.5.1aii and 5.5.1bii)

### Overall Target Completion Date:

Action Step Number	Action Step Description	Target Completion Date
1	Provide evidence to OCC to confirm compliance.	January 2025
2	Submit state plan amendment with evidence of compliance.	August 2025

## HEALTH AND SAFETY: PRECAUTIONS IN TRANSPORTING CHILDREN

### Reason(s) for non-compliance:

- The Lead Agency does not require pre-service or orientation training on precautions in transporting children for license-exempt family child care homes, and does not require pre-service or orientation training within three months on precautions in transporting children for licensed centers or licensed family child care homes, as required by 98.44(b)(1)(i). (Plan Question 5.4.1i)
- The Lead Agency does not require an annual inspection for license-exempt family child care homes for compliance with pre-service or orientation training requirements related to precautions in transporting children, as required by 98.42(b)(2)(ii). Additionally, the Lead Agency does not require an annual unannounced inspection for licensed centers or licensed family child care homes for compliance with pre-service or orientation training requirements related to precautions in transporting children, as required by 98.42(b)(2)(i)(B). (Plan Questions 5.5.1aii, 5.5.1bii, and 5.5.2bi)

### Overall Target Completion Date:

Action Step Number	Action Step Description	Target Completion Date
1	Provide evidence to OCC to confirm compliance.	January 2025
2	Submit state plan amendment with evidence of compliance.	August 2025

## HEALTH AND SAFETY: PREVENTION AND RESPONSE TO EMERGENCIES FROM FOOD AND ALLERGIC REACTIONS

### Reason(s) for non-compliance:

- The Lead Agency does not require all staff in licensed centers or licensed family child care homes to complete pre-service or orientation training within three months on the prevention and response to emergencies from food and allergic reactions, as required by 98.44(b). (Plan Question 5.4.1m)
- The Lead Agency does not require an annual unannounced inspection for licensed centers or licensed family child care providers for compliance with pre-service orientation training requirements related to prevention and response to emergencies from food and allergic reactions, as required by 98.42(b)(2)(i)(B). (Plan Questions 5.5.1aii and 5.5.1bii)

### Overall Target Completion Date:

Action Step Number	Action Step Description	Target Completion Date
1	Provide evidence to OCC to confirm compliance.	January 2025
2	Submit state plan amendment with evidence of compliance.	August 2025

## **HEALTH AND SAFETY: PREVENTION OF SHAKEN BABY SYNDROME, ABUSIVE HEAD TRAUMA, AND CHILD MALTREATMENT**

**Reason(s) for non-compliance:**

- The Lead Agency does not require pre-service or orientation training on prevention of child maltreatment for licensed family child care homes, and does not require pre-service or orientation training within three months on the prevention of shaken baby syndrome, abusive head trauma, and child maltreatment for licensed centers or licensed family child care homes, as required by 98.44(b)(1)(i). (Plan Question 5.4.1f)
- The Lead Agency does not require an annual unannounced inspection for licensed centers and licensed family child care homes for compliance with pre-service or orientation training requirements related to the prevention of shaken baby syndrome, abusive head trauma, and child maltreatment, as required by 98.42(b)(2)(i)(B). (Plan Questions 5.5.1aii and 5.5.1bii)

**Overall Target Completion Date:**

<b>Action Step Number</b>	<b>Action Step Description</b>	<b>Target Completion Date</b>
<b>1</b>	Provide evidence to OCC to confirm compliance.	January 2025
<b>2</b>	Submit state plan amendment with evidence of compliance.	August 2025

## **HEALTH AND SAFETY: SUDDEN INFANT DEATH SYNDROME AND SAFE SLEEP**

**Reason(s) for non-compliance:**

- The Lead Agency does not require all staff in licensed centers or licensed family child care homes to complete pre-service or orientation training within three months on sudden infant death syndrome and safe sleep practices, as required by 98.44(b). (Plan Question 5.4.1m)
- The Lead Agency does not require an annual unannounced inspection for licensed centers or licensed family child care homes for compliance with pre-service or orientation training requirements related to sudden infant death syndrome and safe sleep practices, as required by 98.42(b)(2)(i)(B). (Plan Questions 5.5.1aii and 5.5.1bii)

**Overall Target Completion Date:**

<b>Action Step Number</b>	<b>Action Step Description</b>	<b>Target Completion Date</b>
<b>1</b>	Provide evidence to OCC to confirm compliance.	January 2025
<b>2</b>	Submit state plan amendment with evidence of compliance.	August 2025