



TO: **Child Care Eligibility and Authorization Workers
and Supervisors
Income Maintenance Supervisors
Income Maintenance Lead Workers
Income Maintenance Staff
Training Staff
Child Care Coordinators**

DECE/BCCSA OPERATIONS MEMO

No: 22-17 **AMENDED**

DATE: ~~09/19/2022~~ **10/13/2022**

Child Care

FROM: Junior Martin, Director
Bureau of Child Care Subsidy Administration
Division of Early Care and Education
Department of Children and Families

SUBJECT: Authorizing School Closed Hours When Continuity of Care is Maintained

CROSS REFERENCE: [Wisconsin Shares Handbook](#), Sections:
2.4.2.2 Authorizations Based on Continuity of Care
2.4.4.4.1 School Closed Hours
CSAW User Guide – Authorizations

EFFECTIVE DATE: October 1, 2022

PURPOSE: This Operations Memo clarifies policy and creates the process for calculating school closed hours for an authorization when the parent chooses to maintain the original higher level of authorized hours, known as Continuity of Care (COC) hours.

BACKGROUND: Title 45 of the Code of Federal Regulations, s. [98.21\(a\)\(1\)\(ii\)\(D\)](#) requires that children receive the same level of care regardless of any reduction in work, training, or education hours, as long as the parent is still working or attending training, or education.

During the 12-month eligibility period when a parent has a change in their approved activity schedule and the new authorization assessment results in reduced hours, the parent may choose the authorization for the reduced hours, maintain the original number of authorized hours, or request an authorization for any number of hours that is between the original authorized hours and the new assessment results. If the parent chooses to maintain the original number of authorized hours, their child must attend the provider for those authorized hours. The COC hours are intended to continue to be utilized.

School closed hours must be considered separately and may be authorized in addition to the COC hours when the school closure overlaps with the parent's current approved activity schedule.

POLICY: The following policy will be added to the Wisconsin Shares Handbook with the next release. New policy is highlighted and policy that has been removed is indicated with red strikethrough. Amended material is represented by blue highlight.

Section 2.4.2.2 Authorizations Based on Continuity of Care

During the 12-month eligibility period, an authorization assessment must be completed when an authorization is written to an expected change (see 2.3.8) or when certain changes are reported.

For all reported changes not listed in Section 2.4.2.1, the authorized hours must be based on Continuity of Care (COC). Reported changes include but are not limited to:

- A change in the number of child care hours required to allow the parent(s) to participate in their approved activities, including travel between the child care provider and the location of the activity.
- A change in the overlapping activity schedules of two-parent families.
- When a school-age child transitions from the end of the school year to summer break.
- A change in a child's shared placement schedule.
- Any change that results in a change in child care need, except when the child care need no longer aligns with the provider's hours of operation, which will require an authorization to be based on the assessment results (see 2.4.2.1).

When the agency worker completes an assessment during the 12-month eligibility period and the assessment indicates a reduction in hours, the parent may:

- Choose an authorization for the reduced hours,
- Maintain the original number of authorized hours, or
- Request an authorization for any number of hours between the original authorized hours and the new assessment results.

If the parent chooses the reduced hour authorization or any number of hours between the original authorized hours and the new assessment results, the agency worker must document the conversation and the parent's choice for a reduced authorization in case comments (see 2.4.1).

~~**Process:** If the authorization assessment indicates a reduced number of authorized hours and the parent chooses to keep the hours from the previous authorization, the agency worker must use the "Copy From Prior Authorization" button in CSAW or override the weekly hours to be the same as the previous authorization. For more information about the "Copy From Prior Authorization" button, see the CSAW Authorizations - Processing Various Change Scenarios User Guide.~~

~~If the assessment indicates an increase to the authorized hours, the agency worker must verify information related to the increase of approved activity hours before increasing the authorized hours.~~

Example 1: Annabelle works at Main Street Café from 9 a.m. to 1 p.m. She has an authorization for 30 hours per week including travel time. In June, she reports that her work hours have changed to 1 p.m. to 4 p.m. Annabelle is not planning to change child care providers. The

agency worker completes an authorization assessment and finds the assessment results in 25 hours per week, including travel time. The agency worker asks Annabelle if she would like to keep her original authorized hours or if she would like to decrease to 25 hours per week. Annabelle chooses the reduction. The agency worker documents this conversation and the decision in case comments and completes the authorization.

If at any time the parent informs the agency worker that the child will attend the child care provider for fewer hours than are currently authorized, the agency worker must reduce the authorization to align with the parent's request. Parents are required to report when they have a change in child care need which includes when the number of days or hours that the Assistance Group needs child care has changed (see 1.8.1).

Example 2: Cassie works at Plastics Manufacturing from 7 a.m. to noon. She has an authorization for her baby, Renee, for 27 hours per week, including breaks and travel time. In January, Cassie reports that her work hours have changed to 6 p.m. to 10 p.m. The agency worker completes a new authorization assessment with her new schedule and finds the assessment results in 22 hours per week, including breaks and travel time. The agency worker asks Cassie if she would like to keep the 27-hour authorization or if she would like to decrease to the 22-hour authorization. Cassie indicates that she would like to keep the 27-hour authorization. The agency worker uses the "Copy From Prior Authorization" button and completes the authorization.

If the parent chooses to keep the original number of hours, the parent must intend to send their child to the provider for those authorized hours. For policy on how continuity of care applies to school-age children and school closed hours, see Section 2.4.4.4.1. If the parent consistently sends the child to their provider for significantly fewer hours, but makes a full subsidy payment to the provider for the full number of hours, then it could result in an overpayment (see 4.5.4.2.4.5) an investigation may take place by the agency to determine if a parent error occurred. Parents does have the option to use authorization hours during whichever time they prefer as long as the provider is open and regulated during that time.

Example 3: Roxanne loses her job and is placed in an Approved Activity Search Period (ACTS). She tells her agency worker that she would like to continue sending her children to child care using the same schedule as when she was working (40 hours per week). The agency worker leaves her current authorization in place. However, Roxanne consistently takes her children to child care for only 10 hours per week and continues paying the child care provider the same full-time amount. Roxanne is required to report a change in child care need and her case may must be evaluated for an overpayment by the agency to determine if a parent error occurred.

Example 4: Mariana has an authorization for her child, Paulo. Mariana is working third shift when she loses her job, and Paulo's authorization is for overnight care. Mariana contacts the local agency, and the agency worker updates the Approved Activity Status in CWW to ACTS. The agency worker does not need to update Paulo's authorization. Mariana can continue using the same number of authorized hours to send Paulo to child care during the day while she looks for a job. Mariana will need to work out the child care schedule with her child care provider.

2.4.4.4.1 School Closed Hours

All parents with school-age children who are three (3) years old or older on September 1 enrolled in school may request authorized hours Wisconsin Shares subsidy for days and hours that school is closed according to the school calendar (i.e. for teacher conferences or teacher in-service days) when the parent will need child care in order to attend work or other approved

~~activity or due to inclement weather when the parent needed child care in order to attend work or other approved activity. when they need child care to participate in their approved activity and school is closed due to:~~

- ~~Planned closures, according to the school calendar (i.e., teacher conferences, teacher in-service days, etc.).~~
- ~~Unplanned closures (i.e., inclement weather, emergency maintenance, etc.).~~

~~Children with an authorization only for scheduled school closed hours (zero-hour authorization) may also receive additional child care subsidy when school is unexpectedly closed; this includes closures due to inclement weather as well as closures that are not weather-related.~~

~~School closed hours assist with the cost of child care when school is not in session and when school is closed due to inclement weather, including but not limited to: snowstorms, below-zero conditions, hail, or ice.~~

Children who have before and/or after school care at one (1) provider may need a second authorization to a different provider for when school is closed. If a child only needs care when school is closed, the agency worker can create a “zero-hour authorization” in CSAW (see 2.4.4.4).

School closed hours can be requested in advance by parents who know their work schedule and school closed need ahead of time. School closed hours can also be requested within 10 calendar days after the school day closure whether the day was a planned school closed day or an unexpected closure. The 10 calendar days begins the day after the last day of the school closure or school closure period. A school closure period **must have means multiple** consecutive school closed days. Agency workers must document the reason for the school closure in case comments (see 2.4.1).

~~For policy and process regarding short-term authorizations that may be needed to cover holiday and spring breaks, see Section 2.3.10. Agency workers have the option to enter the school closed hours/days using the process described below or may create separate, short-term authorizations as described in Section 2.3.10.~~

Example 1: Susie has a zero-hour authorization for her school-age child, Derek. She calls on January 15 to request school closed hours for Derek. His school was closed January 4 and 5 due to a snowstorm but the child care program was open, and Susie needed to work. Because the request was made within 10 calendar days from the last day the school was closed **consecutively**, the agency worker may add the additional hours for the days Derek attended child care while school was closed.

~~**Example 2:** Katie has a zero-hour authorization for her school-age child, Preston. She calls on May 4 to request school closed hours for Preston because his school was closed from April 20 – 24 due to flooding. Because the request was made within 10 calendar days from the last day the school was closed, the agency worker may add the additional hours for the days Preston attended child care while school was closed.~~

~~**Example 3:** Teri has a zero-hour authorization for her school-age child, Coby. She calls on February 14 to request school closed hours for Coby because school was closed on February 4 due to a snowstorm and February 5 due to cold temperatures. Because the request was made~~

~~within 10 calendar days from the last day school was closed, the agency worker adds the additional hours for the days Coby attended child care while school was closed.~~

Example 2: Jessica has a zero-hour authorization for her school-age child, Laura. She calls on February 17 to request school closed hours for Laura because school was closed on February 5 and February 10. Because the request was made within 10 calendar days of February 10 but not February 5, the agency worker adds the additional hours only for February 10 for when Laura attended child care while school was closed. No school closed hours were added to February 5 because it has been more than 10 calendar days after the school closure.

~~Children who are authorized for a before and after school program or a co-located Head Start or 4K program as described in Section 2.4.4.2 may need a secondary zero-hour authorization if care at the school program is not available during school closures, including inclement weather.~~

Children who are homeschooled, truant, in out-of-school suspension, or expelled and dis-enrolled are not eligible for school closed hours. ~~Children who are homeschooled, truant, or in out-of-school suspension are also not eligible for an authorization during the typical school day. However, expelled children who are considered dis-enrolled may be eligible to receive an authorization during the typical school day (see 2.4.4.3.)~~

School closed hours must be considered by comparing the parent's current approved activity schedule to the school closed hours request; the resulting overlap in hours may be added to the authorization for school closed days.

A parent with a full-time authorization under the COC policy for their school-age child should must be advised to use their current weekly authorized hours to meet their school closed need. who requests school closed hours for a full week such as spring break or winter break should not be authorized for additional school closed hours if the existing authorized hours will cover the hours requested. Additional hours may be authorized if the comparison between the current parent approved activity schedule and the school closed hours request shows that the child needs additional hours beyond what is currently authorized in the COC authorization for the parent to participate in their approved activity. However, adding school closed hours may not increase the subsidy amount.

To avoid over-authorizing school closed hours when a child has a COC authorization, agency workers must consider the following:

- Any previously authorized school closed hours for the same instance, either already added to the authorization or issued through a Post-Load Benefit Correction (PLBC), need to be reduced from the overlapping hours.
- Whether the parent can use the currently authorized hours to cover the school closed need.
- The child care provider's hours of operation.

Example 3: Foua works 8:30 a.m. to 5:30 p.m. Monday through Friday. Her child, Hong, has a 16-hour per week COC authorization for before and after school care that includes travel time for afternoon pick-up. Hong's school day is from 8 a.m. to 3 p.m. School will be closed all day on Friday and Foua calls to request school closed hours for Hong. The agency worker compares Foua's current approved activity schedule to the school closed hours request and sees that the

overlapping hours are from 8:30 a.m. to 3 p.m. Since Hong's COC authorization only includes travel time for afternoon pick-up, Foua also needs an additional 30 minutes of travel time for morning drop-off on school closed days, resulting in a total of seven (7) school closed hours needed. The agency worker adds these hours to Hong's authorization through PLBC.

Example 4: On February 9, Nate called to request a school closed day for his child, Troy, for February 8 because school was closed due to freezing rain. February benefits were already loaded so the agency worker added the additional school closed hours through PLBC.

Then, on March 2, Nate calls to request a school closed day for February 25 for a teacher in-service. Before the additional school closed hours are added, the agency worker must confirm that school closed hours were not previously added for February 25 to the authorization or through PLBC. The agency worker reviews the PLBCs in CSAW and sees that school closed hours were not added for February 25 and authorizes those hours.

Example 5: Tara previously worked full-time, third shift, but now works first shift for 15 hours per week. She has a 45-hour weekly COC authorization for her child, Tina. She uses these hours in the evenings and on weekends. In March, Tara calls to request school closed hours for Tina for Friday, March 4, and for the week of spring break (March 21–March 25). The worker compares Tara's current approved activity schedule to the school closed hours request. The agency worker informs Tara that the school closed hours will not be authorized because the full-time COC authorization already covers the additional hours. She must use her existing authorized hours to meet this school closed need. Tara's current approved activity schedule is 9 a.m. to 6 p.m. Monday through Friday. Tina's school day is 8 a.m. to 3 p.m. Tara also needs an additional 30 minutes of travel time for morning drop-off on school closed days. After comparing Tara's approved activity schedule to the school closed hours request, the worker sees that the overlapping hours are from 9 a.m. to 3 p.m. with 30 minutes additional travel time for morning drop-off each day. This totals 32.5 school closed hours in addition to the 45-hour COC authorization, totaling 77.5 hours for the week.

The worker discusses this need with Tara and concludes that she only needs care 9 a.m. to 6 p.m. Monday through Friday with a one (1) hour of travel time each day for a total of 50 hours. Since, Tina already has a 45-hour COC authorization, the worker only adds one (1) hour each day for the school closed hours request for the week of March 21–March 25 for a total of five (5) hours added through PLBC. However, no additional subsidy funds were calculated because Tina already has a full-time authorization.

Parents in an Approved Activity Search Period (ACTS) or Temporary Break Period (TBRK) are not eligible for additional child care hours, including additional school closed hours (see 2.4.3.4.2).

The school closed hours are subject to the same 90-day removal policy as all other funds (see 3.3.1.3). If the parent received additional subsidy hours for school closures and has not expended all the funds within 90 days, the funds will age off and no longer be available to the parent.

CSAW: There are no CSAW changes associated with this update. Workers must continue to use the current parent approved activity schedule, the child's school schedule, and any additional travel time needed on school closed days to determine the correct number of school closed hours to authorize. Workers will continue to have the option to select the "Copy from

Prior Authorization” button to override the current/newly derived hours and maintain the original number of authorized hours. Refer to the CSAW User Guide – Authorizations for guidance on how to use the “Copy From Prior Authorization” button and how to add school closed hours. Language explaining the process of calculating school closed hours when a Continuity of Care authorization is in place will be included in the next CSAW User Guide – Authorizations update.

CONTACTS: For Wisconsin Shares policy questions outside of Milwaukee County contact your Bureau of Regional Operations (BRO), Child Care Coordinators at BROCCPolicyHelpDesk@wisconsin.gov.

For Program Integrity technical assistance, Child Care CARES/CWW and CSAW Processing Questions statewide, and policy questions in Milwaukee County, contact the Child Care Help Desk at: childcare@wisconsin.gov or 608-422-7200.

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