



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: 22-19 **Amended**

DATE: ~~10/10/2022~~ **03/02/2023**

Child Care

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

SUBJECT: Updates to Authorization Policies for Wisconsin Shares

CROSS REFERENCE: [Wisconsin Shares Handbook](#)
Section 2.3.8 Authorization End Dates
Section 2.4.2 Length of Authorization
Section 2.4.9 Changing and Ending an Authorization During a Month

EFFECTIVE DATE: December 1, 2022

PURPOSE: This Operations Memo informs local agencies of updates to Wisconsin Shares policies pertaining to authorization end dates, the length of authorizations, and changing and ending authorizations during a month.

BACKGROUND:

Section *2.3.8 Authorization End Dates* and section *2.4.2 Length of Authorization* were combined and revised to indicate that authorizations must be written with an end date of the next renewal or the next expected change **that requires an authorization to be based on assessment results.**

Clarification was added to section *2.4.9 Changing and Ending an Authorization During a Month* to state that a new authorization can be created to a different provider if the child has not attended the provider during the current month and the parent has not spent any of the current month's subsidy funds.

POLICY: The following policies will be added to the Wisconsin Shares Handbook with the next release and applies to authorizations written on or after the November handbook release. New policy is **highlighted in yellow** and policy with a **red-strikethrough** is being deleted. **Amendment revisions are highlighted in teal.**

*NEW POLICY***Section 15.3 Authorization End Dates**

(Formerly Sections 2.3.8 Authorization End Dates and 2.4.2 Length of Authorization)

Agency workers must write a authorization with an end date of ~~should span to~~ the next renewal date or ~~to~~ the next expected change that requires an authorization to be based on the assessment results (see 17.1.1, formerly 2.4.2.1), whichever comes first. If an authorization is written for fewer than 12 months or written to a next expected change that does not require an authorization to be based on assessment results, agency workers must document in case comments the reason for that the authorization end date less than 12 months (see 12.2, formerly 2.4.1). ~~Shorter authorizations are allowable if needed in order to collect sufficient schedule information from a parent with a new and varying schedule (see 2.4.3). Shorter authorizations must be written in accordance with Sections 2.3.9 and 2.3.10.~~

Expected changes include, but are not limited to:

- A change in the school year that results in a higher or lower child care need for a school-aged child for summer or fall.
- The end date of an approved activity, such as:
 - Wisconsin Works (W-2) employability plan or FoodShare Employment and Training (FSET) employment plan reviews; or
 - The end of a parent's school term.
- The end of the 24-month education time limit for eligible parents who are participating in Basic Education (see 5.1.2.2, 3.8.6.2), Technical College or a Course of Study Leading to Employment (see 5.1.2.3, 3.8.6.3), or Online Education (see 5.1.2.4, 3.8.6.4).
- A change in a child care provider.
- A parent's plan to move out of state.

If there are multiple expected changes, the authorization must end on the earliest date.

~~If the parent indicates that they do not need an authorization, there may be an allowable gap in authorizations of one (1) calendar month or more during the eligibility period, as illustrated in the example below. If the parent requests a new authorization during the eligibility period after there has been a gap of one (1) calendar month or more between authorizations, the agency worker must complete an authorization assessment and the authorized hours must be based on the assessment results (see 2.4.2.1).~~

~~**Example:** In September, Alanna completes her annual renewal. Alanna's worker writes an authorization for the school year and asks Alanna about her child care needs for the following summer. Alanna indicates that her child, Josepha, does not need an authorization after June 15 because she will be visiting her grandparents in Florida for the summer. Alanna's worker does not write an authorization for the summer months.~~

2.4.2 Length of Authorization

Authorization assessments ensure that an authorization is written to meet the child care needs that allow a parent to engage in their approved activity. Agency workers must write authorizations for the longest duration possible: up to the next renewal or the next expected change (see 2.3.8). Longer authorizations reduce fluctuations in the monthly subsidy amount and copayment calculation. If an authorization is less than 12 months, agency workers must document in case comments the reason that the authorization is less than 12 months (see 2.4.1).

Section 17.1 Authorization Changes

(New policy)

After a parent reports a change that impacts any of the authorization components defined in Chapter 16, the agency worker must complete an authorization assessment. An authorization assessment means the agency worker must:

- End the current authorization at the end of the current month
- Enter a new parent schedule with the begin date of the change
- Complete a new authorization using the most recently reported information. The new authorization must start the beginning of the next month if there is an existing authorization.

In some instances, a change requires a new authorization to be based on the assessment results (see 17.1.1, *formerly 2.4.2.1*). Other times, the new authorization may continue at the same number of hours as the previous authorization (see 17.1.2, *formerly 2.4.2.2*). If an assessment indicates an increase to the authorized hours, the agency worker must verify eligibility information related to the increase of approved activity hours before increasing the authorized hours (see 7.9.2, *formerly 1.5.12.2*).

Example 1: Shantell works 8 a.m. to 4:30 p.m., Monday – Friday. Her child, Tara, has an authorization for the times when she is working. In June, Shantell reports that she is no longer working Friday afternoons. The agency worker ends the current authorization on June 30 and enters Shantell's new schedule with the date she first began her new schedule. The worker creates a new authorization beginning July 1 using Shantell's new schedule and then evaluates whether the new authorization should be based on continuity of care or the assessment results.

Example 2: Robin works 10 a.m. to 2 p.m. Monday – Friday at Stamp World. Her child, Brandon, has an authorization for the times when she is working. She calls the local agency today to report that she quit Stamp World and is now working at Closet Warehouse. Her hours are the same, working 10 a.m. to 2 p.m. Monday – Friday. The agency worker ends the current authorization at the end of the current month and creates a new authorization. The worker writes the new authorization with a start date of the first of the following month and enters Robin's new schedule using the date she first started working at Closet Warehouse.

Section 17.3 Changing Authorizations During a Month

(Formerly Section 2.4.9 Changing and Ending an Authorization During a Month)

When an authorization has been established for a full month, parents may receive an authorization to a different provider only if **in the following situations:**

- An agency or ~~parent~~ ~~client~~ error occurred in which funds ~~a subsidy amount was~~ were loaded to the EBT card for the incorrect provider;
- The ~~parent chooses a different provider after the subsidy amount was loaded on the EBT card, but the~~ child has not attended the provider during the current month, and the parent has not spent any of the current month's subsidy funds; or
- The situation meets the Hardship Policy in Section 17.3.1 (*formerly 2.4.9.1*).

~~In all the above situations,~~ If the parent is eligible for an authorization to a different provider in a month, the agency worker must end the current authorization ~~to the incorrect provider~~ at the end of the current month and write a new authorization to the ~~new correct~~ provider for the current month.

Example 1: Jennie requested an authorization for her child, Luke, at ABC123 Childcare beginning December 1. When Jennie arrived on the first day, the child care provider informed her that the \$100 registration fee was due that day. Jennie was not aware of the registration fee and was not prepared to pay the fee. She immediately contacted her agency worker requesting to change her child care provider. Jennie had not ~~pre-paid~~ the provider any of her subsidy benefit and Luke had not attended the provider at all. The agency worker ~~can~~ ends the authorization on December 31, and creates a new authorization to a new provider beginning December 1, and requests to have the funds to ABC123 retracted. The agency worker reminds Jennie of the importance of meeting with the child care provider ahead of time and being sure that she is aware of the full cost of child care.

~~If the authorization was created to the incorrect provider, regardless of whether a payment was made to the incorrect provider by the parent, see Section 4.5.1 regarding retraction of funds to the incorrect provider.~~

~~**Process:** An agency worker with the Child Care Coordinator profile in CSAW must write the new authorization to the second provider for the current month if the total number of hours authorized to the first provider and second provider are greater than 75 hours per week.~~

Example 2: Dorothy's child, Dean, has an authorization to Lake Kids. Dean has been attending Lake Kids for the past four (4) months. Dorothy stops sending Dean to Lake Kids at the end of February and starts sending him to Eagles Child Care on March 1. However, she didn't call until March 9 to request a new authorization to Eagles Child Care. She hasn't paid any of her March funds to Lake Kids. Since Dean did not attend Lake Kids in March and Dorothy did not pay any March subsidy funds to Lake Kids, the agency worker requests a retraction of the funds to Lake Kids from Dorothy's EBT card and creates a new authorization starting March 1 to Eagles Child Care.

CONTACTS:

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