

TO: Child Care Eligibility and Authorization Workers

and Supervisors

Income Maintenance Supervisors Income Maintenance Lead Workers

**Income Maintenance Staff** 

**Training Staff** 

**Child Care Coordinators** 

FROM: Junior Martin, Director

Bureau of Child Care Subsidy Administration

Division of Early Care and Education Department of Children and Families DECE/BCCSA OPERATIONS MEMO

No: 24-17

DATE: 9/12/2024

**Child Care** 

SUBJECT: Wisconsin Shares Safe at Home Participant Authorization Card

CROSS REFERENCE: Wisconsin Shares Handbook,

Section 2.3 Confidentiality

Section 7.7 Nonfinancial Eligibility Verification

**EFFECTIVE DATE:** Immediately

**PURPOSE:** The purpose of this operations memo is to inform local agencies of a change in policy regarding the collection of verification for Safe at Home participants.

**BACKGROUND:** The Safe at Home program offers a safeguard for individuals facing real or potential abuse, stalking, trafficking, or those concerned about their physical safety by providing them with a confidential substitute address for public and private use. To improve accessibility for families and to support the well-being of those enrolled in the Safe at Home program, the Wisconsin Shares program will no longer require participants in the Safe at Home program to present their Participant Authorization Card as proof of enrollment.

With this policy revision, participants in the Safe at Home program can now self-declare their enrollment status. This adjustment aligns with similar changes implemented across programs administered by the Department of Health Services, all aimed at safeguarding the confidentiality and well-being of those enrolled in the Safe at Home program.

**POLICY:** The changes listed below will be incorporated into the Wisconsin Shares Handbook effective November 1, 2024.

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## **NEW POLICY**

# **Section 2.3 Confidentiality**

All Wisconsin Shares case information is confidential. No person may use or disclose information regarding individuals applying for or receiving Wisconsin Shares for any purpose that is not related to the administration of Wisconsin Shares. Local agency records and data are confidential and should be open to public inspection or disclosure only when required by state or federal law. If local agencies have questions or concerns about disclosure, they should contact their local Corporation Counsel. If Corporation Counsel needs assistance, they may contact the Department of Children and Families (DCF) Office of Legal Counsel for assistance.

#### Safe at Home

Safe at Home is a statewide address confidentiality program administered by the Department of Justice that provides those who fear for their physical safety with a legal substitute address to be used for both public and private purposes. Safe at Home allows participants to use and receive mail at an assigned address in lieu of their actual address and then forwards the mail to the participants' actual address free of charge. Parents participating in the Safe at Home program will have an Authorization card with the Safe at Home mailing address. Verification of enrollment in the Safe at Home program is self-declared; a copy of the Participant Authorization card is not required. For more information about the program, see the Safe at Home page on Wisconsin Department of Justice website and Process Help Chapter 77.

No information regarding a Safe at Home participant's actual address, including home, work, or school, may be shared under any circumstances, absent a court order. Any questions regarding this prohibition should be directed to DCF BEFORE releasing any information to anyone. This rule is absolute and includes sharing with other government programs and agencies. The parent's Safe at Home mailing address can be shared with other programs as necessary.

There is **no** reason that local agencies need the actual home, work, or school address of a Safe at Home participant to determine eligibility or establish an authorization. Any verification received that includes the parent's actual address must be censored or obscured prior to scanning the verification into the Electronic Case File (ECF). Anything regarding the parent's actual address, including home, work, or school, must not be entered in CWW.

#### **Government Agencies and Third Parties**

Information that is needed to administer Wisconsin Shares may be exchanged with other government agencies or third parties. This includes:

- Communication with Wisconsin Works (W-2) Financial and Employment Planners (FEPs) and FoodShare Employment and Training (FSET) workers regarding program activities
- Communication with the Child Support Agency (CSA) regarding good cause claims, information needed to establish a child support case, or household composition
- Communication with employers or other third parties when assisting the parent with obtaining verification
- Communication with child care providers regarding discounts, inclusion rates, or authorizations

### **Health Information**

Certain case information is highly confidential and subject to additional safeguarding. See the ECF Handbook for additional information on Restricted Documents.

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When assisting the parent with obtaining documentation needed to verify that the parent meets the policy in <u>Section 5.2</u>, the agency worker must obtain a signed <u>Confidential Information</u> <u>Release Authorization form (DCF-F-369-E)</u>. The form is not required when the parent provides verification without requiring assistance from the local agency.

## **Investigations**

Local agencies must not disclose the reason for or details about an investigation to any person not within the assistance group without permission from the local agency's Corporation Counsel. Local agencies can disclose any applicable information to governmental officials conducting an investigation, prosecution, or civil proceeding for Wisconsin Shares. The official must submit a written request to the local agency to obtain the information.

The request must include:

- The identity of the person requesting the information
- Their authority to request the information
- The violation under investigation
- · The individual being investigated

However, the local agency must disclose information to the District Attorney (DA) and fraud investigators without a written request.

# **Section 7.7 Nonfinancial Eligibility Verification**

No additions are being made to this policy concerning Safe at Home. This reference serves as a reminder that participants in the Safe at Home program are exempt from residency and address verification.

#### **CONTACTS:**

For Wisconsin Shares policy questions outside of Milwaukee County contact your Bureau of Regional Operations (BRO), Child Care Coordinators at <a href="mailto:BROCCPolicyHelpDesk@wisconsin.gov">BROCCPolicyHelpDesk@wisconsin.gov</a>.

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: <a href="mailto:childcare@wisconsin.gov">childcare@wisconsin.gov</a> or 608-422-7200.

DCF/DECE/BCCSA/SW