

COUNTY OF MILWAUKEE
Inter-Office Communication

DATE: September 19, 2017

TO: Theodore Lipscomb, Sr., Chairman, Milwaukee County Board of Supervisors

FROM: Jeanne Dorff, Interim Director, Department of Health and Human Services
Prepared by: Dennis Buesing, Contract Administrator - DHHS

SUBJECT: **Report from the Interim Director, Department of Health and Human Services, requesting approval to administer a new appeal process for individuals barred or restricted under the Milwaukee County Caregiver Policy**

ISSUE

Milwaukee County Resolution File No. 99-233, passed by the Milwaukee County Board of Supervisors in 1999, requires the Department of Health and Human Services (DHHS) to restrict or deny any prospective providers from working under a DHHS contract with children and/or youth if an individual was found with any disqualifying criminal convictions as listed in the resolution.

Currently, there is no provision in the resolution for individuals to obtain a rehabilitation review hearing if restricted or denied as a service provider for a DHHS contracted agency.

BACKGROUND

The resolution included a list of convictions that would bar an individual from providing direct service to children and youth (see Attachment 1). The provisions of the resolution include convictions that are not listed as barred offenses outlined in State Department of Health Service (DHS) 12, Offenses Affecting Caregiver Eligibility.

In early 2017, an individual provider who was barred under this resolution, contacted DHHS inquiring about having the restriction lifted. DHHS has no process for an individual to appeal a restriction under the current policy.

In accordance with Wis. Stat. 50.065(5), the State Department of Health Services (DHS) and Department of Children and Families (DCF) have a well-established process which allows individuals with a barred conviction or finding of abuse, neglect or misappropriation to apply for a rehabilitation review. The rehabilitation review is an opportunity for a caregiver to provide clear evidence that a repeat of the conduct that led to conviction is unlikely and that clients will remain safe under their care.

In collaboration with the Office of Corporation Counsel, DHHS has developed a policy and procedure (see Attachment 2 – DHHS Rehabilitation Review Process) to allow individuals to apply for a rehabilitation review. The policy is based on a similar procedure used by the state agencies.

The resolution applies to all offenses not covered by the Wisconsin Caregiver Misconduct laws and its administrative rehabilitation review (see Attachment 3, Comparison List of Offenses WI Caregiver Law and Milwaukee County Resolution 99-233). The offenses highlighted in yellow would be subject to the proposed rehabilitation review process. However, this process does not guarantee an appellant approval as a provider of direct care and services to children and youth.

Recommendation

It is recommended that the Milwaukee County Board of Supervisors authorize the Interim Director of DHHS, or her designee, under the direction and supervision of the Office of Corporation Counsel, to administer the DHHS Rehabilitation Review Process as outlined in Attachment 2.

Fiscal Impact

Adoption of this resolution will have no fiscal impact. A fiscal note form is attached.



Jeanne Dorff, Interim Director
Department of Health and Human Services

Attachment (3)

cc: County Executive Chris Abele
Raisa Koltun, County Executive's Office
Kelly Bablitch, County Board
County Supervisor Supreme Moore-Omokunde
Lisa Wozny, Fiscal & Management Analyst, DAS
Erica Hayden, Research & Policy Analyst – Comptroller's Office
Colleen Foley, Office of Corporation Counsel

(ITEM) From the Interim Director, Department of Health and Human Services, requesting approval to administer a new appeal process for individuals barred or restricted under the Milwaukee County Caregiver Policy, by recommending adoption of the following:

A RESOLUTION

WHEREAS, in September 1999, the Milwaukee County Board of Supervisors adopted Resolution File No. 99-233 which directed Milwaukee County departments that contract out for youth services and programs to require all contracted agencies for these services and programs to certify that potential employees have not been convicted of certain barred offenses; and

WHEREAS, this resolution applies to all offenses not covered by the Wisconsin Caregiver Misconduct laws and its administrative rehabilitation review; and

WHEREAS, the policy applies only to those employees who provide direct care and services to Milwaukee County children and youth in the ordinary course of their employment, and is not intended to apply to other agency employees such as clerical, maintenance or custodial staff whose duties do not include direct care and services to children and youth; and

WHEREAS, as currently written, this policy provides no rehabilitation review process under which an individual who the County has excluded from having any contact with children and youth in the direct provision of care and services as a result of a barred conviction to demonstrate; and

WHEREAS, the State Departments of Health Services (DHS) and Children and Families (DCF) have a well-established process which allows individuals with a barred conviction or finding of abuse, neglect or misappropriation to apply for a rehabilitation review as defined in Wis. Stats. §50.065(5) to provide by clear and convincing evidence that he or she has been rehabilitated; and

WHEREAS, DHHS and Corporation Counsel have jointly developed a policy and procedure governing a rehabilitation review process modeled on the State DHS and DCF procedure; and

WHEREAS, an individual seeking a rehabilitation review must first submit an application to DHHS Contract Administration; DHHS, or its designee, shall then appoint a review panel of at least three people including one representative from Corporation Counsel and one program expert to review the application and issue a written determination based on majority vote;

WHEREAS, the decision of the panel is final, subject to judicial review; now, therefore,

BE IT RESOLVED, that the Milwaukee County Board of Supervisors adopts the policy and procedure titled, "DHHS Rehabilitation Review Process" attached hereto; and

50 BE IT FURTHER RESOLVED, that the Interim Director, Department of Health and Human
51 Services, or her designee, is hereby authorized to implement the rehabilitation review process
52 upon adoption.
53

MILWAUKEE COUNTY FISCAL NOTE FORM

DATE: 8/24/17

Original Fiscal Note ☒

Substitute Fiscal Note ☐

SUBJECT: Report from the Interim Director, Department of Health and Human Services, requesting approval to administer a new appeal process for individuals barred or restricted under the Milwaukee County Caregiver Policy

FISCAL EFFECT:

- ☒ No Direct County Fiscal Impact
- ☐ Existing Staff Time Required
- ☐ Increase Operating Expenditures
(If checked, check one of two boxes below)
- ☐ Absorbed Within Agency's Budget
- ☐ Not Absorbed Within Agency's Budget
- ☐ Decrease Operating Expenditures
- ☐ Increase Operating Revenues
- ☐ Decrease Operating Revenues
- ☐ Increase Capital Expenditures
- ☐ Decrease Capital Expenditures
- ☐ Increase Capital Revenues
- ☐ Decrease Capital Revenues
- ☐ Use of contingent funds

Indicate below the dollar change from budget for any submission that is projected to result in increased/decreased expenditures or revenues in the current year.

	Expenditure or Revenue Category	Current Year	Subsequent Year
Operating Budget	Expenditure	0	0
	Revenue	0	0
	Net Cost	0	0
Capital Improvement Budget	Expenditure		
	Revenue		
	Net Cost		

DESCRIPTION OF FISCAL EFFECT

In the space below, you must provide the following information. Attach additional pages if necessary.

- A. Briefly describe the nature of the action that is being requested or proposed, and the new or changed conditions that would occur if the request or proposal were adopted.
- B. State the direct costs, savings or anticipated revenues associated with the requested or proposed action in the current budget year and how those were calculated.¹ If annualized or subsequent year fiscal impacts are substantially different from current year impacts, then those shall be stated as well. In addition, cite any one-time costs associated with the action, the source of any new or additional revenues (e.g. State, Federal, user fee or private donation), the use of contingent funds, and/or the use of budgeted appropriations due to surpluses or change in purpose required to fund the requested action.
- C. Discuss the budgetary impacts associated with the proposed action in the current year. A statement that sufficient funds are budgeted should be justified with information regarding the amount of budgeted appropriations in the relevant account and whether that amount is sufficient to offset the cost of the requested action. If relevant, discussion of budgetary impacts in subsequent years also shall be discussed. Subsequent year fiscal impacts shall be noted for the entire period in which the requested or proposed action would be implemented when it is reasonable to do so (i.e. a five-year lease agreement shall specify the costs/savings for each of the five years in question). Otherwise, impacts associated with the existing and subsequent budget years should be cited.
- D. Describe any assumptions or interpretations that were utilized to provide the information on this form.

A. The Interim Director of the Department of Health and Human Services (DHHS) is requesting authorization to implement a new rehabilitation review process as part of the Milwaukee County Caregiver policy.

Approval of this request will allow individuals who have been denied employment as a provider of direct services to youth and children due to a barred conviction or finding of abuse, neglect or misappropriation to apply for a rehabilitation review. A rehabilitation review provides an opportunity for an individual to demonstrate by clear and convincing evidence that he or she has been rehabilitated.

B. Under this new policy, DHHS will coordinate the rehabilitation review policy and application process including the appointment of a three-member panel consisting of a representative from Corporation Counsel. Additional staff time is anticipated to support this new process but no additional costs are anticipated. The department anticipates a very low volume of rehabilitation requests therefore, the investment of staff time should be minimal.

C. There is no tax levy impact associated with approval of this request in 2017.

D. No additional assumptions have been made.

¹ If it is assumed that there is no fiscal impact associated with the requested action, then an explanatory statement that justifies that conclusion shall be provided. If precise impacts cannot be calculated, then an estimate or range should be provided.

Department/Prepared By Clare O'Brien, Senior Budget Analyst

Authorized Signature 

Did DAS-Fiscal Staff Review? ☐ Yes ☒ No

Did CDPB Staff Review? ☐ Yes ☐ No ☒ Not Required

**RESOLUTION REQUIRING BACKGROUND CHECKS ON
DEPARTMENT OF HEALTH AND HUMAN SERVICES
CONTRACT AGENCY EMPLOYEES PROVIDING
DIRECT CARE AND SERVICES TO CHILDREN AND YOUTH**

Provisions of the Resolution (File No. 99-233) requiring criminal background checks for current or prospective employees of DHS contract agencies and agencies/organizations with which the DHS has reimbursable agreements providing direct care and services to Milwaukee County children and youth were initially passed by the County Board in September, 1999.

In May, 2000, the County Board adopted a modification of the resolution that separates individuals who have committed crimes under the Uniform Controlled Substances Act under Chapter 961 Wisconsin Statutes from the felony crimes referenced in the original Resolution and those referenced under Chapter 948 of the Statutes.

The Resolution shall apply only to those employees who provide direct care and services to Milwaukee County children and youth in the ordinary course of their employment, and is not intended to apply to other agency employees such as clerical, maintenance or custodial staff whose duties do not include direct care and services to children and youth.

1. DHS contract agencies and agencies/organizations with which the DHS has reimbursable agreements are required to certify, by written statement to the DHS, that they have a written screening process in place to ensure background checks, extending at least three (3) years back, for criminal and gang activity, for current and prospective employees providing direct care and services to children and youth. The background checks are to be made prior to hiring a prospective employee on all candidates for employment regardless of the person's place of residence.
2. DHS contract agencies and agencies/organizations with which the DHS has reimbursable agreements are required to certify, by written statement to the DHS, that they are in compliance with the provisions of the Resolution; that the statement shall be subject to random verification by the DHS or its designee; and, that the DHS or its designee shall be provided, on request, at all reasonable times, copies of any or all background checks performed on its employees pursuant to this Resolution.
3. DHS contract agencies and agencies/organizations with which the DHS has reimbursable agreements which do not provide to the DHS or its designee, copies of any or all background checks, on request, at all reasonable times, pursuant to this Resolution, shall be issued a letter of intent within 10 working days by the DHS or its designee to file an official 30-day notice of termination of the contract, if appropriate action is not taken by the contract agency towards the production of said documents
4. DHS contract agencies and agencies/organizations with which the DHS has reimbursable agreements shall perform criminal background checks on current employees who provide direct care and services to children and youth by January 31, 2001; and, after 48 months of employment have elapsed, criminal background checks shall be performed every four (4) years within the year thereafter.
5. DHS contract agencies and agencies/organizations with which the DHS has reimbursable agreements shall hire prospective employees after January 31, 2001 conditioned on the provisions stated above for criminal background checks and, after four (4) years within the year thereafter, and for new employees hired after January 31, 2001.
6. DHS contract agencies and agencies/organizations with which the DHS has reimbursable agreements which determine that a current or prospective employee was convicted of one or more of the following offenses shall notify the DHS or its designee immediately. Offenses include: homicide (all degrees);

felony murder; mayhem; aggravated and substantial battery; 1st and 2nd degree sexual assault; armed robbery; administering dangerous or stupefying drugs; and, all crimes against children as identified in Chapter 948 of Wisconsin Statutes.

7. DHS contract agencies and agencies/organizations with which the DHS has reimbursable agreements which determine that a current or prospective employee was convicted of any other offense not listed in Number 6 shall notify the DHS or its designee immediately. Offenses include but are not limited to: criminal gang member solicitations; simple possession; endangering public safety; robbery; theft; or, two (2) or more misdemeanors involving separate incidences within the last three (3) years.
8. DHS contract agency employees and employees of agencies/organizations with which the DHS has reimbursable agreements who provide direct care and services to children and youth, charged with any of the offenses referenced in Number 6 and Number 7, shall notify the DHS or its designee within two (2) business days of the actual arrest.
9. Upon notification from a contract agency or from agencies with other reimbursable agreements that their screening process has identified a current or prospective employee with a conviction as stated in Number 6, or a conviction that occurred less than three (3) years from the date of employment as stated in Number 7, the DHS or its designee shall issue a letter of intent within 10 working days to file an official 30-day notice of termination of the contract if appropriate action is not taken towards the exclusion of said individual from having any contact with children or youth in the direct provision of care and services to children and youth.
10. The DHS or its designee, upon receipt of notification of potentially disqualifying past criminal misconduct or pending criminal charges as stated in Number 6 and Number 7 of this Resolution, shall terminate the contract or other agreement if, after 10 days' notice to the contract agency, the DHS or its designee has not received written assurance from the agency that the agency has taken appropriate action towards the convicted current or prospective employee consistent with the policy expressed in this Resolution.
11. DHS contract agencies and agencies/organizations with which the DHS has reimbursable agreements which determine that a current or prospective employee was convicted of any crime under the Uniform Controlled Substances Act under Chapter 961 of Wisconsin Statutes, excluding simple possession, and the conviction occurred within the last five (5) years from the date of employment or time of application, shall notify the DHS or its designee immediately.
12. Upon notification from a contract agency or from agencies with other reimbursable agreements that their screening process has identified a current or prospective employee with a conviction under the Uniform Controlled Substances Act under Chapter 961 of Wisconsin Statutes, excluding simple possession, the DHS or its designee shall issue a letter of intent, within 10 working days, to file an official 30-day notice of termination of the contract if appropriate action is not taken towards the exclusion of said individual from having any contact with children or youth in the direct provision of care and services to children and youth. **Current or prospective employees of DHS contract agencies or other reimbursable agreements who have not had a conviction within the last five (5) years under the Uniform Controlled Substances Act under Chapter 961 of Wisconsin Statutes, excluding simple possession, shall not be subject to the provisions of this Resolution.**

Milwaukee County Department of Health & Human Services Contract Administration	Date Issued:	Reviewed: By: Contract Administration	Section: CONTRACT ADMINISTRATION	Policy No: 800-005	Pages: 1 of 3 REVISED
<input checked="" type="checkbox"/> Delinquency & Court Services <input checked="" type="checkbox"/> Disabilities Services Division <input checked="" type="checkbox"/> Housing Division <input checked="" type="checkbox"/> Management Services Division	Effective Date: DATE APPROVED BY COUNTY BOARD	Subject: Attachment 2 - DHHS Rehabilitation Review Process Milwaukee County Caregiver Resolution 99-233			

I. POLICY

It is the policy of Milwaukee County Department of Health & Human Services (DHHS) that an individual who was found with a barred conviction as identified in the Milwaukee County Resolution 99-233 paragraph No. 6 to work as a direct service provider; or for a conviction considered substantially related to client care pursuant to Department of Health Services (DHS) 12.06 and/or Department of Children and Families (DCF) 12.06 guidelines, may seek Rehabilitation Review Approval in order to be considered eligible to work under program(s) funded by DHHS.

If any barrable offenses are also covered under WI Caregiver Law, the state's rehabilitation review process will supersede this policy.

Offenses listed under paragraphs 7 and 11 of the resolution are not covered by this policy as they already have a defined time limit related to the offense.

This policy applies to **all** DHHS contractors or service providers having reimbursable contracts or agreements to provide direct care and/or services to children and youth (*see Attachment 2 – DHHS Policy 001 - Milwaukee County Caregiver Resolution Summary*).

II. DEFINITIONS

A. Caregiver (Direct or Indirect Service Provider) – a person who meets all of the following:

1. Is employed by, under contract with an entity, volunteer or intern.
2. Has regular, direct contact with or access to the entity's clients, or their personal property.
3. Is under the entity's control.

A Caregiver is also a person who is one of the following:

1. The owner or administrator of an entity, whether or not they have regular, direct contact with clients.
2. A board member or corporate officer that has regular, direct contact with clients.

B. Regular Contact –contact that is planned, scheduled, expected or periodic.

C. Direct Contact –face-to-face proximity to a client that affords the opportunity to commit abuse or neglect of a client or misappropriation of a client's property.

II. DEFINITIONS – cont'd

- D. **Under the Entity's Control** – a person employed by or under contract with the entity for whom the entity does both of the following:
1. Determines whether a person employed by or under contract with the entity that has access to clients may provide care, treatment or other similar support service functions to clients being served by the entity.
 2. Directs or oversees one or more of the following:
 - a) The policy or procedures the person must follow in performing his or her duties as a caregiver/employee.
 - b) The conditions under which the person performs his or her duties.
 - c) The tasks performed by the person.
 - d) The person's work schedule.
 - e) The supervision or evaluation of the person's work or job performance, including imposing discipline or awarding performance awards.
 - f) The compensation the person may receive for performing his or her duties as a caregiver/employee.
- E. **"Contract Agency"** – an agency, organization or individual with whom a DHHS contract, agreement or Memoranda of Understanding has been executed.
- F. **"Direct Service Provider"** (DSP) – Contract Agency employee, volunteer, paid or unpaid intern, Independent Service Provider or subcontractor, who provides direct care and/or Covered Services to a Participant/Service Recipient on behalf of a Contract Agency, for which the Contract Agency receives compensation from the DHHS under the agreement.
- G. **"Indirect Staff"** - is an employee, individual independent contractor or subcontractor who is not a DSP, but is associated with Covered Services as a supervisor, billing staff, case records and/or quality assurance worker, and/or is someone (i.e.: volunteer) who has access to clients, client property, and/or client information of Service Recipients. Agency owner, President, CEO, Executive Director, and/or Senior Staff are considered Indirect Staff if reporting to work at a site where Covered Services are provided.

III. PROCEDURE

A. Eligibility to request rehabilitation review

An individual found with a barred conviction as identified on the Milwaukee County Resolution 99-233 (No. 6) may seek Rehabilitation Review Approval.

B. Applying for rehabilitation review

To apply for rehabilitation review, an individual who is eligible to request rehabilitation review shall do all of the following:

1. **Obtain a Milwaukee County Resolution - DHHS Rehabilitation Review Application and submit the completed application to DHHS/Contract Administration (DHHS/CA)**

Milwaukee County Resolution - DHHS Rehabilitation Review Application and Instructions is available on DHHS contract management website, <http://county.milwaukee.gov/ContractMgt15483.htm>

2. **Submit any supporting documents and information required by the Rehabilitation Review Application to DHHS/CA.**

SUBMIT complete application, supporting documents and information by US mail:-

Department of Health and Human Services (DHHS)

Attn - Contract Administration, Suite 304

1220 West Vliet Street

Milwaukee, WI 53205

C. Time Frame

Failure to submit or if the application is not complete or any supporting documents or information required in the application are not submitted within 90 days after the date the application was first received by DHHS/CA, the request for a rehabilitation review shall be denied, unless the individual requesting the rehabilitation review provides a good cause explanation.

D. Rehabilitation Review Panel

If an individual who is eligible for rehabilitation review and submits an application that is complete no later than the deadline, DHHS/CA or its designee shall appoint a review panel of at least 3 persons, including one representative from Milwaukee County Corporation Counsel (MCCC) and one program expert to review the information submitted. The panel may request additional information from the person requesting the review or from other agencies or persons familiar with the person.

E. Rehabilitation Review Panel Meeting

The individual requesting the rehabilitation review shall have an opportunity to appear before the review panel to present information and answer any questions the panel members may have. Individual will be notified by mail when and where the Rehabilitation Review panel meeting will be held.

F. Rehabilitation Review Decision

The Panel will issue a written determination based upon a majority vote.

- If the Review Panel finds sufficient evidence of rehabilitation, the decision will provide the reasons for approval, and may specify any conditions or limitations that are imposed; and
- If the Review Panel does not find sufficient evidence of rehabilitation, the decision will provide the reasons for denial. Decision is final subject to judicial review.
- A decision may be deferred for up to six months to gather additional information or for other reasons.

IMPORTANT

A rehabilitation approval does not ensure that the individual applicant will receive employment, regulatory approval, contracts, or permission to reside at an entity. It also does not remove criminal conviction or any other governmental finding that required rehabilitation review.

Comparision List of Offenses WI Caregiver Law and Milwaukee County Resolution 99-233

WI State Statue	Name of Offense	Checked if Barred per WI Caregiver Law	Checked if Barred per Milw Co Resolution 99-233 (highlighted reflects those barred by MC Resolution only)
940, 941 and 943 crimes that are covered are listed below:			
940.01	1st Degree Intentional Homicide	✓	✓
940.02	1st Degree Reckless Homicide	✓	✓
940.03	Felony Murder	✓	✓
940.05	2nd Degree Intentional Homicide	✓	✓
940.07	Homicide resulting from negligent control of vicious animal	-	✓
940.08	Homicide by negligent handling of dangerous weapon, explosives or fire	-	✓
940.09	Homicide by intoxicated use of vehicle or firearm	-	✓
940.1	Homicide by negligent operation of vehicle	-	✓
940.12	Assisting Suicide	✓	-
940.19 (2), (3), (4), (5), or (6)	Battery; substantial battery; aggravated battery (felony)	✓	✓
940.22 (2), Or (3)	Sexual exploitation by therapist; duty to report	✓	-
940.225 (1)	1st Degree Sexual Assault	✓	✓
940.225 (2)	2nd Degree Sexual Assault	✓	✓
940.225 (3)	3rd Degree Sexual Assault	✓	-
940.285 (2)	Abuse of individuals at risk	✓	-
940.29	Abuse of residents of pental facilities	✓	-
940.295	Abuse and neglect of patients and residents	✓	-
940.21	Mayhem	-	✓
941.32	Administering Dangerous or Stupefying Drugs	-	✓
943.32 (2)	Armed Robbery	-	✓
948 crimes that are covered are listed below:			
948.015	Other offenses against children	-	✓
948.02 (1)	1st Degree Sexual Assault of a child	✓	✓
948.02 (2)	2nd Degree Sexual Assault of a child	✓	✓
948.02 (3)	3rd Degree Sexual Assault of a child	-	✓
948.025	Engaging in repeated acts of sexual assault of the same child	✓	✓
948.03 (2) (a), (b), or '(c)	Physical abuse of a child (intentional causation of bodily harm)	✓	✓
948.03 (3)	Physical abuse of a child -Reckless Causation of Bodily Harm	-	✓
948.03 (4)	Physical abuse of a child - Failing to Act to Prevent Bodily Harm	-	✓

Comparison List of Offenses WI Caregiver Law and Milwaukee County Resolution 99-233

WI State Statue	Name of Offense	Checked if Barred per WI Caregiver Law	Checked if Barred per Milw Co Resolution 99-233 (highlighted reflects those barred by MC Resolution only)
948.04	Causing mental harm to a child	-	✓
948.05	Sexual exploitation of a child	✓	✓
948.051	Trafficking of a child	✓	✓
948.055	Causing a child to view or listen to sexual activity	✓	✓
948.06	Incest with a child	✓	✓
948.07	Child enticement	✓	✓
948.075	Use of a computer to facilitate a child sex crime	-	✓
948.08	Soliciting a child for prostitution	✓	✓
948.085	Sexual assault of a child placed in substitute care	✓	✓
948.09	Sexual intercourse with a child age 16 or older	-	✓
948.095	Sexual assault of a child by a school staff person or a person who works or volunteers with children	-	✓
948.1	Exposing genitals, pubic area, or intimate parts	-	✓
948.11	Exposing a child to harmful material or harmful descriptions or narrations.	✓	✓
948.11 (2)(a)	Whoever, with knowledge of the character and content of the material, sells, rents, exhibits, plays, distributes, or loans to a child any harmful material, with or without monetary consideration, is guilty of a Class I felony	-	✓
948.11 (am)	Any person who has attained the age of 17 and who, with knowledge of the character and content of the description or narrative account, verbally communicates, by any means, a harmful description or narrative account to a child, with or without monetary consideration, is guilty of a Class I felony	-	✓
948.12	Possession of child pornography	✓	✓
948.13	Child sex offender working with children	✓	✓
948.14	Registered sex offender and photographing minors	-	✓
948.2	Abandonment of a child	-	✓
948.21	Neglecting a child	✓	✓
948.22	Failure to support	-	✓
948.23	Concealing or not reporting death of a child; not reporting disappearance of a child	-	✓
948.24	Unauthorized placement for adoption	-	✓
948.25	Unauthorized interstate placements of children	-	✓
948.3	Abduction of another's child; constructive custody	✓	✓
948.31	Interference with custody by parent or others	-	✓
948.4	Contributing to the delinquency of a child	-	✓
948.45	Contributing to truancy	-	✓
948.50	Strip search by school employee	-	✓
948.51	Hazing	-	✓
948.53	Child unattended in child care vehicle	✓	✓
948.55	Leaving or storing a loaded firearm within the reach or easy access of a child	-	✓
948.60	Possession of a dangerous weapon by a person under 18	-	✓
948.605	Gun-free school zones	-	✓

Comparison List of Offenses WI Caregiver Law and Milwaukee County Resolution 99-233

WI State Statue	Name of Offense	Checked if Barred per WI Caregiver Law	Checked if Barred per Milw Co Resolution 99-233 (highlighted reflects those barred by MC Resolution only)
948.61	Dangerous weapons other than firearms on school premises	-	✓
948.62	Receiving stolen property from a child	-	✓
948.63	Receiving property from a child	-	✓
948.7	Tattooing of children	-	✓
OTHER OFFENSES that are covered are listed below:			
	Finding by a government agency of abuse or neglect of a client or of misappropriation of a client's property	✓	-
	Finding by a government agency of child abuse or neglect	✓	-