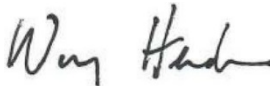




July 11, 2022

Child Welfare Licensing Memo Series 2022-19-lic  
Supersedes Child Welfare Licensing Series Memo 2019-17-lic

To: Private Child Placing Agencies

From: Wendy Henderson  
Division Administrator 

RE: Record Storage

### PURPOSE

This memo supersedes Child Welfare Licensing Series Memo 2019-17-lic and clarifies the requirements for file storage for private child placing agencies. It also reiterates and makes clear that private child placing agencies may store files electronically.

### BACKGROUND

All child placing agencies are required to maintain records listed in Wis. Admin. Code s. DCF 54.06(2)(a)-(c). Pursuant to Wis. Admin. Code s. DCF 54.06(2)(b), child placing agencies must maintain all records in a safe place protected from fire damage, theft, and unauthorized scrutiny.

Child Welfare Licensing Series Memo 2019-17-lic previously interpreted this rule to mean that the sole way to meet this requirement was for records to be in fireproof cabinets. Additionally, that memo did not address electronic record storage.

### INFORMATION SUMMARY

Wisconsin Admin. Code s. DCF 54.06(1) requires that "Each agency shall maintain records and submit reports prescribed by the department. Authorized representatives of the department shall have access to all records pertinent to licensing and to specific adoption searches and disclosure of the adoption search information."

Wisconsin Admin. Code s. DCF 54.06(2)(b) requires that, "All records shall be kept in a safe place protected from fire damage, theft and unauthorized scrutiny."

Adoption records must additionally be maintained in a separate file and in a manner that ensures confidentiality and must be kept permanently in accordance with DCF Admin. Code ss. DCF 54.06(2)(c) & 53.07(1).

- The department previously noted in the annotated version of Wis. Admin. Code s. DCF 54.06 that, "Agencies must keep hard copies of closed adoption records, or the records may be stored on microfiche. The statutes require records to be permanent and microfiche is the only acceptable method other than hard copies. Electronic storage of these records is not acceptable."



This memo serves as notification that all records required to be maintained in Wis. Admin. Code s. DCF 54.06 may be stored electronically and the language in the above annotation that disallows electronic storage no longer accurately reflects department policy.

Private child placing agencies may store records using microfiche or in a digital file so long as the agency follows the guidelines set forth in [Child Welfare Licensing Memo Series 2022-18-lic](#) for the use and storage of electronic records. Agencies that store permanent files electronically must ensure that they are stored, maintained, and migrated to accessible formats throughout the lifecycle of the record. Agencies must also continue to ensure that adoption records are maintained in a separate file and in a manner that ensures confidentiality as required by Wis. Admin. Code s. DCF 54.06(2)(c).

An agency that is already storing their records digitally may continue doing so. All agencies should follow guidelines set forth in [Child Welfare Licensing Memo Series 2022-18-lic](#).

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LINKS: [Child Welfare Licensing Memo Series 2022-18-lic](#)