

I. INTRODUCTION

The Personal Responsibility and Work Opportunity Reconciliation Act of 1996 (PRWORA) requires the State of Wisconsin to submit this TANF State Plan to the U.S. Secretary of Health and Human Services to renew Wisconsin's eligibility for federal Temporary Assistance for Needy Families (TANF) funding. This Wisconsin TANF State Plan outlines how Wisconsin implements the TANF provisions in accordance with the requirements of the federal Department of Health and Human Services (DHHS)/Administration for Children and Families (ACF). This TANF State Plan provides specific information about program delivery, eligibility criteria, employment and work training, other elements of work-based participation, case management services, program funding and certifications.

Wisconsin's primary TANF programs are administered by the Wisconsin Department of Children and Families (DCF). DCF was created on July 1, 2008 as Wisconsin's first state agency focused exclusively on promoting the economic, social well-being of the children and families of Wisconsin. DCF brings together key programs that serve children and families – such as Wisconsin's primary TANF program Wisconsin Works (W-2), Child Support, Child Care and Child Welfare. DCF is committed to protecting children, strengthening families, and building communities. DCF's five overarching goals are:

1. Children are nurtured, safe and engaged;
2. Enhance prevention and early intervention efforts throughout Wisconsin;
3. Families will have access to quality early care and education;
4. Parents will secure and maintain meaningful jobs; and
5. Fathers will be more engaged in the lives of their children.

DCF works closely with the other state agencies that also administer Wisconsin's TANF programs and services, including the Department of Administration (DOA), Department of Health Services (DHS), Department of Public Instructions (DPI) and Department of Revenue (DOR).

GENERAL PROVISION ASSURANCES

Under the TANF Plan, Wisconsin will provide services to needy families. For many TANF programs, need is defined as a percentage of the federal poverty level (FPL). While each program has its own standards, all are either at or below two hundred fifty (250) percent of FPL. When an alternate measure of need is used to determine eligibility, this is noted in the applicable program description. Qualifying programs that have no income limits are also noted in the program description.

The State ensures the following:

1. Wisconsin's TANF program is designed to serve all political subdivisions in the State (not necessarily in a uniform manner), provide assistance and services to needy families with (or expecting) children, and provide parents with job preparation, work and support services to enable them to leave the program and become self-sufficient.
2. The program requires a parent or caretaker receiving assistance to engage in work (as defined by the State) once the State determines that the parent or caretaker is able to engage in work, or once the parent or caretaker has received assistance under the program

for twenty-four (24) months (whether or not consecutive), whichever is earlier, consistent with section 407(e)(2).

3. Parents and caretakers receiving assistance under the program shall be engaged in work activities in accordance with section 407.
4. Reasonable steps shall be taken as the State deems necessary to restrict the use and disclosure of information about individuals and families receiving assistance under the program attributable to funds provided by the federal government. Note: Chapter 49 of Wisconsin State Statutes details the restrictions on disclosure of information for Wisconsin's TANF programs.
5. Goals have been established and action has been taken to prevent and reduce the incidence of out-of-wedlock pregnancies, and numerical goals have been established for reducing the illegitimacy ratio of the State (as defined in section 403(a)(2)(C)(iii)). (See Prevention of Unintended Pregnancies.)
6. A program is conducted, designed to reach state and local law enforcement officials, the education system, and relevant counseling services, that provides education and training on the problem of statutory rape so that teenage pregnancy prevention programs may be expended in scope to include men. (See Prevention of Statutory Rape.)

PUBLIC INPUT

Through the Wisconsin biennial budget process, the Legislature's Joint Finance Committee meetings and other public forums, there is ongoing public dialogue regarding Wisconsin's TANF programs.

DCF will begin its forty-five (45) day public comment period on the draft October 1, 2009 – December 31, 2011 TANF State Plan simultaneous to submitting this draft to the U.S. Department of Health and Human Services.

At the beginning of the public comment period, DCF will place an announcement on its public website regarding the availability of the draft TANF State Plan for public comment. The web site announcement will include:

- a web link to the draft TANF State Plan,
- instructions on how to obtain a hard-copy of the draft TANF State Plan,
- information on the public hearing,
- instructions for submitting comments, and
- the timeframe for submitting comments.

This same information will be sent via a DCF Division of Family and Economic Security (DFES) Administrator's Memo. In addition, the following groups and individuals will receive the information directly via an e-mail notice: DCF Area Administrators and Regional Administrators, W-2 agencies, child care coordinators, child support agencies, directors of county departments of human services and social services, tribal economic support directors, other state agencies, and the Great Lakes Intertribal Council.

All written and oral comments on the draft TANF State Plan will be reviewed and considered for potential changes. After the conclusion of the public comment period, DCF will summarize the number of comments received, the types of comments received, and any changes DCF made to the draft TANF State Plan as a result of the comments.

II. WISCONSIN'S TANF PROGRAMS

Wisconsin has several types of TANF programs, including the W-2 program and many other TANF programs and services.

A. W-2 PROGRAM

W-2 BASIC ASSUMPTIONS

DCF established the following basic assumptions as the basis for quality W-2 services:

- **Work is the best way for parents to support their families.** Getting a job is the first step in the process of achieving economic stability. W-2 assists parents with preparing for, finding and maintaining consistent employment. W-2 also works with parents who are unable to work due to a disability by assisting these parents with navigating the Supplemental Security Income and Social Security Disability Insurance application process.
- **Family income should improve when parents work.** W-2's goal is to have parents get the best possible job. W-2 also helps parents access work supports (e.g. Earned Income Tax Credit [EITC], FoodShare [FS] (Wisconsin's Food Stamp program), BadgerCare [BC] (Wisconsin's Medicaid program), Child Support [CS] and Wisconsin Shares (Wisconsin's Child Care program) that will support keeping parents employed.
- **Consistent work is essential for parents to achieve economic stability.** W-2 commits to working with parents before and after they find a job. W-2 supports job retention and advancement in a variety of ways because individual progress toward independence and prosperity is a process. W-2 connects interested parents to needed education and training either before or after gaining employment, in order to help parents move forward to better employment.
- **W-2 participants must be willing to participate in exchange for W-2 benefits.** Parents across the state have access to individualized quality services. Parents, for their part, must participate to the best of their abilities.
- **Families benefit from participating in W-2.** W-2 assists parents with identifying their goals and locating needed resources. During each interaction, W-2 works to ensure parents understand their choices and the resulting consequences. This approach empowers parents to make informed decisions that strengthen their family. W-2 works with both custodial parents in a two-parent family and extends services to non-custodial parents when appropriate.
- **W-2 matches the needs of working parents with the needs of local employers.** Local W-2 agencies operate cooperatively within the larger community. W-2's objectives are best achieved by understanding the needs of local employers and matching that need with the skills and interests of W-2 participants.

W-2 PROGRAM DELIVERY SYSTEM

W-2 Program Access

DCF contracts with county human/social service agencies, private non-profit agencies and private for-profit agencies to provide W-2 services across the state. Some contracts cover just one of Wisconsin's seventy-two (72) counties, others cover a group of counties (often referred to as consortiums), and in Milwaukee County, Wisconsin's most populous county, contracts cover part of the county.

2006-2009 W-2 Contracts

W-2 agencies were awarded W-2 contracts for the period January 1, 2006, through December 31, 2009. During this period, there were forty-two (42) W-2 Agencies. The agencies include a combination of public and private agencies, selected through a competitive process and Right of First Selection.

The Balance of State contracts had the following mix of agency types:

- **Twenty-two (22) Balance of State counties were operated by four (4) private non-profit agencies**
 - Forward Services Corporation –*
 - Bay Area Consortium: Brown; Florence; Kewaunee and Menominee*
 - Northern Consortium: Forest; Langlade; Lincoln; Oneida and Vilas*
 - Waushara*
 - Shawano County Job Center – Shawano*
 - Workforce Connections Inc. –*
 - Columbia*
 - Douglas*
 - Pierce and St. Croix*
 - Western Consortium: Buffalo; Jackson; Juneau; Monroe and Trempealeau*
 - Workforce Resource, Inc. – Barron and Chippewa*
- **Four (4) Balance of State counties and were operated by two (2) private for-profit agencies**
 - Arbor Education and Training – Ozaukee, Washington and Waukesha*
 - Kaiser Group, Inc. – Walworth*
- **Forty-five (45) Balance of State counties were operated by county-run agencies**

Thirty-two (32) W-2 agencies were county human/social services or employment/training agencies including seven county consortiums acting on behalf of thirteen (13) additional county human/social services agencies.

Milwaukee County contracts had the following agency types:

- **W-2 Case Management Agencies served five (5) regions in Milwaukee County**
 - YWCA of Greater Milwaukee (private non-profit) – Milwaukee County Northeast Region*
 - UMOS (private non-profit) – Milwaukee County Central and Southeast Regions*
 - MAXIMUS, Inc. (private for-profit) – Milwaukee County Northwest and Southwest Regions*
- **W-2 Job Development Placement Agencies served five (5) regions in Milwaukee County**
 - UMOS (private non-profit) – Milwaukee County Central and Southeast Regions*

MAXIMUS, Inc. (private for-profit) – Milwaukee County Southwest Region
Policy Studies, Inc. (private for-profit) – Milwaukee County Northeast and Northwest Regions

- **W-2 SSI Advocacy Agency served all of Milwaukee County**
UMOS (private non-profit)

Eight Tribes developed a TANF plan and are working directly with the federal government: Bad River, Lac du Flambeau, Menominee, Oneida, Potawatomi, Red Cliff, Sokaogon and Stockbridge-Munsee.

All W-2 agencies are either co-located or electronically linked to Job Centers in each W-2 geographic area. Job Centers connect employers and job seekers at the local level to meet employer's workforce needs and provide career planning, job placement and advancement, and training for job seekers. Job Centers are open to all job seekers, including W-2 participants.

2010 – 2011 W-2 Contracts

Balance of State W-2 agencies were awarded W-2 contracts for the period January 1, 2010, through December 31, 2011. During this period, there are thirty-two (32) W-2 Agencies in the Balance of State. The agencies include a combination of public and private agencies, selected through a competitive process and Right of First Selection.

The Balance of State contracts have the following mix of agency types:

- **Twenty-eight (28) Balance of State counties operated by three (3) private non-profit agencies**
 - Forward Services Corporation* – Brown, Florence; Forest; Kewaunee; Langlade; Lincoln; Marathon; Marinette; Marquette; Menominee; Oneida; Shawano; Vilas and Waushara Consortium
 - Workforce Connections Inc.* – Buffalo; Columbia; Douglas; Jackson; Juneau; Monroe; Pierce; St. Croix; Trempealeau and Vernon Consortium
 - Workforce Resource Inc.* – Barron; Chippewa; Clark and Rusk Consortium
- **Four (4) Balance of State counties operated by two (2) private for-profit agencies**
 - Arbor Education and Training* – Ozaukee; Washington and Waukesha Consortium
 - Kaiser Group, Inc.* – Walworth
- **Thirty-nine (39) Balance of State counties operated by county-run agencies**

Twenty-seven (27) W-2 agencies are county human/social services agencies in the balance of state including seven county consortia acting on behalf of eleven (11) additional county human/social services agencies.

In the 2010-2011 Contracts, Milwaukee has the following agency types:

- **W-2 Eligibility and Assessment Agency serving all of Milwaukee County**
Social Development Commission (SDC) (private non-profit)
- **W-2 Employment Agencies serving five (5) regions in Milwaukee County**
 - YWCA of Greater Milwaukee* (private non-profit) – Milwaukee County Northeast Region
 - UMOS* (private non-profit) – Milwaukee County Southeast Region
 - MAXIMUS, Inc.* (private for-profit) – Milwaukee County Central and Southwest Regions
 - Policy Studies, Inc.* (private for-profit) – Milwaukee County Northwest Region

- **W-2 SSI Advocacy Agency serving five (5) regions in Milwaukee County**
UMOS (private non-profit) – Milwaukee County Southwest and Southeast Regions
Public Consulting Group (private for-profit) – Milwaukee County Central, Northeast and Northwest Regions

The Milwaukee County 2010-2011 W-2 Contracts were slated to begin on January 1, 2010. However, DCF did not secure a contractor to provide a key function in Milwaukee (W-2 Eligibility and Assessment Agency) until December 2009. As a result, the contract for the W-2 Eligibility and Assessment Agency and the contracts for the W-2 Employment Agencies will begin April 1, 2010. For the period of January 1, 2010 through March 31, 2010, the 2006-2009 Milwaukee W-2 CMA and JCPA contract agencies will continue to provide services in Milwaukee County. The 2006-2009 SSI/SSDI Advocacy Agency (SSIA) contract in Milwaukee County ended December 31, 2009. New SSIA contracts for 2010-2011 began on January 1, 2010.

In the 2010-2011 W-2 Contracts, DCF builds on the 2006-2009 W-2 Contracts strong employment focus. Improvements in the 2010-2011 W-2 Contracts include:

- Updated performance standards focusing on successful outcomes for participants;
- New rating scale for performance standards which encourages W-2 agencies to meet and exceed performance benchmarks;
- New Incentive Pool with additional program funding for W-2 agencies that exceed or meet identified performance standards; and
- Balance of State consortia W-2 agencies allowed to span across broader areas (across Workforce Development Areas).

DCF's changes and emphasis in the 2010-2011 W-2 Contracts for Milwaukee W-2 agencies include:

- Increased focus on eligibility determination and assessments with the creation of one independent county-wide W-2 Eligibility and Assessment Agency;
- Continued focus on employment as the goal for all W-2 participants, except for those applying for Supplemental Security Income (SSI)/Social Security Disability Income (SSDI), through W-2 Employment Agencies;
- Continued focus on expeditiously assisting people who are likely eligible for SSI/SSDI benefits through two specialized SSI/SSDI Advocacy Agencies;
- Expansion of participant choice by allowing parents to choose which W-2 Employment Agency they will work with; and
- Improved continuum of individualized employment and training services to W-2 participants by requiring that the Milwaukee W-2 Employment Agencies and the SSI/SSDI Advocacy Agencies create an internal Preferred Provider network of diverse and culturally sensitive community and faith based organizations that can provide a continuum of individualized employment and training services to W-2 participants.

DCF requires W-2 agencies to provide services that are strengths-based, family-centered and consistent with parents' interests and goals. W-2 agencies are required to work cooperatively with parents to identify and build on the strengths and skills of parents and families. All services must be provided in a culturally and linguistically competent manner and be accessible for qualified refugees, former refugees and others with limited English proficiency.

Benefits and Services Offered at Wisconsin Works (W-2) Agencies

Wisconsin agencies are required to provide a one-page description of benefits and services available at the W-2 agency to all individuals who ask for assistance. Section 1.6.3.1 of the W-2 Manual provides a link to the Benefits and Services Offered at Wisconsin Works (W-2) Agencies brochure at the following link: <http://dcf.wisconsin.gov/w2/manual/default.htm>. The brochure also can be found in DCF's publications website at: http://dcf.wisconsin.gov/publications/pdf/dwsp_11890_p.pdf.

Financial and Employment Planner (FEP) Role

The FEP is central to W-2 integrated case management and is the primary individual who performs and/or monitors all case management services for the W-2 participant. This approach allows a simplified process for the participating family and is more likely to help build a supportive relationship between the participant and the FEP.

A FEP provides:

- W-2 eligibility determination
- W-2 employment position placement
- Employability Plan (EP) development
- Case management
- Referrals to the child support agency
- All other support services for a participant in a W-2 employment or work training position

W-2 ELIGIBILITY

The primary purpose of W-2 is to prepare eligible parents for unsubsidized employment to help them provide for their families and become self-sufficient members of the community in which they live. There are four categories of individuals who may be eligible for services of the W-2 program:

- Custodial parents of minor children may access all W-2 services.
- Non-custodial parents, subject to a support order for a child, may receive case management services.
- Pregnant women, with no other born children living with them, may receive case management services. Effective January 1, 2010, the W-2 program will allow cash payments to unmarried women, without custody of any dependent children, who provide medical verification of third trimester at-risk pregnancy which results in their inability to work.
- All minor parents are eligible to receive W-2 case management services.

The eligibility criteria used by Wisconsin to ensure fair and equitable treatment of all individuals seeking W-2 services can be found in the W-2 Manual at <http://dcf.wisconsin.gov/w2/manual/default.htm>. Applicants must meet both non-financial and financial eligibility criteria to be considered for a W-2 employment position, a Job Access Loan and certain case management services.

In addition to the criteria set forth in the W-2 Manual, each W-2 agency is required to submit a letter of assurance to DCF regarding the agency's compliance with DCF's Civil Rights

Compliance (CRC) requirements. (See IV. Civil Rights Compliance, Affirmative Action and Complaint Resolution.)

Income Limits

The W-2 group's income must be at or below one hundred fifteen (115) percent of the federal poverty level (FPL).

Asset Limits

The W-2 group's assets cannot exceed two thousand five hundred dollars (\$2,500), excluding the combined equity value of vehicles up to ten thousand dollars (\$10,000) and one home that serves as the homestead.

Cooperation with Child Support

Applicants and participants must cooperate with child support enforcement efforts to be eligible for W-2 services. The determination of whether an applicant is cooperating with child support enforcement efforts is made by the child support agency. An applicant or participant may claim good cause for refusal to cooperate at any time during the application process or once found eligible for W-2 services. When an applicant or participant claims good cause for refusal to cooperate with Child Support, then it is the W-2 agency's responsibility to make a determination of good cause in each of those cases.

Residency Requirement

W-2 applicants must verify that they are currently residents of Wisconsin. With the exception of migrant workers, W-2 applicants must also demonstrate an intent to continue to reside in the state.

TANF assistance received by an adult in Wisconsin or any other state counts toward the sixty (60)-month time limit. When there is evidence that an applicant has received cash assistance in another state, the FEP must:

1. Determine the number of months TANF cash assistance was received in the other state by contacting the appropriate persons;
2. Take steps to ensure that the cash assistance received was, in fact, TANF cash assistance; and
3. Document that information in the case file for future calculation of eligibility.

The W-2 Policy Manual provides resource information to the FEPs on how to contact other states to verify if TANF benefits were received.

Accessing Other Sources of Income

A W-2 applicant may be required to apply for and accept other public assistance programs or resources that may be available, prior to being determined eligible for W-2 services. Applicants who refuse to cooperate are not eligible for a W-2 employment position or a Job Access Loan.

Temporary Absence of a Minor Child

Consistent with the options provided for states in US Code Title 43, Chapter 7, Subchapter IV, Part A, section 608, DCF rule allows W-2 agencies to provide W-2 services to an otherwise eligible family for up to three months when the minor child has been or is expected to be absent from the home for a period of 90 consecutive days. On a case-by-case basis, an extension of the temporary absence timeframe creates a total temporary absence time period for W-2 services of up to one hundred eighty (180) days.

W-2 PROGRAM TIME LIMITS

60-Month Time-Limited W-2 Payment Policy

Both federal TANF and state W-2 legislation include a sixty (60)-month lifetime limit for eligibility. The time-limits were first applied to AFDC recipients participating in the Job Opportunities and Basic Skills (JOBS) program beginning on October 1, 1996. W-2 agencies may extend the time-limits on a case-by-case basis because of circumstances including:

1. The adult W-2 group member is unable to work because of personal disability or incapacitation;
2. The adult W-2 group member has significant limitations to employment;
3. The adult W-2 group member is needed in the home to care for another severely incapacitated group member; or
4. The adult group member has made all appropriate efforts to find work, and is unable to find unsubsidized employment because local labor market conditions preclude a reasonable job opportunity.

24-Month Time Limit for Subsidized Employment Positions

Participation in any W-2 employment and training position category (Trial Job, Community Service Job (CSJ), and W-2 Transition (W-2 T)) is limited to twenty-four (24) cumulative months. Extensions to the time limits may be granted on a case-by-case basis. Effective October 30, 2009, this twenty-four (24)-months time limit will no longer be in effect.

W-2 EMPLOYMENT AND WORK TRAINING FOR CUSTODIAL PARENTS

W-2's goal is to connect parents with appropriate work or work training as soon as possible. This is done by immediate placement in a W-2 employment or work training level:

- Unsubsidized Employment
- Trial Jobs
- CSJs
- W-2 Ts

A participant enters the highest possible employment or work training level according to ability and is expected to move up to the next appropriate level at the earliest opportunity. Each new placement brings with it increased income and greater family economic stability.

Unsubsidized Employment

Unsubsidized employment is the goal for most W-2 participants. W-2 applicants may be placed at this level if they are working in unsubsidized employment and do not have barriers to full-time employment. W-2 participants who obtain employment while in the W-2 program are placed at this level. There are no W-2 cash payments for individuals placed at this level and case management services focused on employment retention and advancement are provided on a voluntary basis.

Case management services for employed individuals placed in Unsubsidized Employment include, but are not limited to:

- Providing guidance in career decision making skills;
- Exploring career options;

- Identifying vocational opportunities;
- Researching training information;
- Creating or updating a resume;
- Developing networking skills;
- Providing referrals to other community resources;
- Providing job survival/retention techniques;
- Providing assistance in creating a financial plan;
- Establishing employment goals;
- Providing information about job openings;
- Improving job interview skills;
- Completing job applications;
- Writing a resume;
- Arranging job interviews with employers;
- Contacting employers on the individual's behalf;
- Providing employment skills training;
- Providing English-as-a-Second Language classes if the W-2 agency determines that the course will facilitate the individual's efforts to retain employment;
- Providing a course of study meeting the standards for the granting of a declaration of equivalency of high school graduation; and
- Providing other remedial education courses.

Follow-Up Case Management Services

Participants who progress from a subsidized employment position to an unsubsidized position receive follow-up case management services for at least twelve (12) months to support job retention.

W-2 agencies may provide follow-up case management services beyond the mandatory twelve (12)-month period regardless of the individual's income and asset levels.

The case management services for participants, who progress from a subsidized employment position to an unsubsidized position, may include all of the same services listed under the Case Management for those in Unsubsidized Employment.

Wisconsin encourages W-2 agencies to provide services beyond the twelve (12)-month period to prevent recidivism and ensure employment stability. There is no time limit on these services.

Subsidized Employment and Work Training

If good faith attempts to obtain employment have been unsuccessful, or if the W-2 agency determines that an applicant is not prepared for unsubsidized employment, the applicant may be offered a W-2 work training placement. Individuals placed in one of the three W-2 work training placements, Trial Jobs, CSJs or W-2 T, may be required to continue appropriate ongoing employment search with the assistance of the W-2 agency, while participating in a W-2 work training placement.

Trial Jobs

Trial Jobs are W-2 subsidized work training placements, intended to encourage employers to give permanent opportunities to individuals who appear job ready, but have a weak work history. The W-2 agency contracts with the employer and pays the employer a subsidy (up to three hundred dollars [\$300] per month) with the expectation that if the W-2 participant performs satisfactorily, the employer will offer that participant permanent employment. The wage subsidy to the employer may be used flexibly at the Trial Job employer's discretion for training, transportation, or as an offset to employment costs.

An individual may participate in a Trial Job for a maximum of three months with an opportunity for a three-month extension in the rare instances where the additional time is needed to assure job readiness. The Trial Job employer must pay at least the minimum federal or state wage per hour and must pay wages and benefits comparable to those received by regular employees in similarly classified positions for every hour worked.

Community Service Jobs (CSJ)

The CSJ work training placement is for individuals who are determined not ready for immediate regular employment. A prorated CSJ placement may be appropriate for individuals who are already working in an unsubsidized job less than thirty (30) hours per week and where attempts to increase the number of hours in their current job or to find additional unsubsidized employment have not succeeded.

A monthly CSJ benefit is six hundred seventy-three dollars (\$673) with a reduction of five dollars and fifteen cents (\$5.15) for each hour that the participant fails, without good cause, to participate in assigned activities. CSJ participants are generally expected to participate forty (40) hours per week - up to thirty (30) hours per week of work training activities and up to ten (10) hours of education and training. Effective October 30, 2009, CSJ participants are expected to participate for up to forty (40) hours per week in a combination of education and training activities and work training activities.

Prorated CSJ payments are based on the number of hours the participant is assigned to activities:

- 1/3 CSJ: Two hundred thirty dollars (\$230) for up to twenty (20) hours per week in a combination of education and training activities and work training activities.
- 1/2 CSJ: Three hundred forty-one dollars (\$341) for up to twenty-five (25) hours per week in a combination of education and training activities and work training activities.
- 2/3 CSJ: Four hundred fifty-two dollars (\$452) for up to thirty (30) hours per week in a combination of education and training activities and work training activities.

CSJ work training providers are expected to offer real work training opportunities with appropriate supervision within an environment which generally replicates that of regular employment, realizing that job coaching and mentoring may be needed to help the participant succeed.

Permissible education and training activities include:

- A course of study for the granting of a declaration of equivalency of high school graduation;
- Technical college courses and educational courses that provide an employment skill;
- Employer-sponsored training;
- English-as-a-Second-Language; and

- Adult basic education courses.

An eighteen (18) or nineteen (19) year old CSJ participant who has not obtained a high school diploma or a declaration of high school graduation may attend a high school or GED course of study to satisfy, in whole or in part, the required hours of participation in a CSJ.

W-2 Transition (W-2 T)

The W-2 T work training placement is for individuals who have been determined to have multiple barriers to employment and are unable to successfully participate in one of the other W-2 work training placements or unsubsidized employment for reasons such as alcohol or drug abuse; an individual's incapacitation; or the need to remain in the home to care for another W-2 group member who has a severe incapacitation or disability.

Participants in W-2 T are placed in full-time activity whenever possible. An in-depth assessment is completed with a qualified assessing agency or individual. The participant's assignment to activities is based on the results of the assessment, which takes into consideration the individual's strengths and limitations. A monthly W-2 T benefit is six hundred twenty-eight dollars (\$628) with a reduction of five dollars and fifteen cents (\$5.15) for each hour that the participant fails without good cause to participate in assigned activities.

Prior to October 30, 2009, the participant may be assigned up to twenty-eight (28) hours per week of work training and up to twelve (12) hours per week of education and training activities. Effective October 30, 2009, the participant may be assigned up to forty (40) hours of activities per week which may include a combination of education and training activities and work training.

W-2 T activities which may be approved by the W-2 agency include:

- Community rehabilitation program - a program that provides directly or facilitates the provision of vocational rehabilitation to individuals with disabilities and that enables an individual with a disability to maximize opportunities for employment;
- Activities similar to a CSJ but with more supervision;
- Volunteer activity;
- A course of study for the granting of a declaration of equivalency of high school graduation;
- Technical college courses and educational courses that provide an employment skill;
- Employer-sponsored training;
- English-as-Second Language;
- Adult basic education courses;
- Alcohol and other drug abuse (AODA) services not covered by Medicaid, including evaluation, detoxification, assessment and treatment programs;
- Mental health activities, as prescribed by an appropriate health care professional;
- Counseling or physical rehabilitation activities;
- Court ordered activities;
- School activities that will provide educational support for children with special needs;
- Activities related to obtaining shelter or retaining safety in a domestic abuse situation or other activities needed to stabilize a family;
- Other activities that the agency determines are consistent with the capabilities of the participant; and

- Caring for a family member with incapacity of such severity that without home care, the incapacitated member's health and well-being would be significantly affected, as determined by the W-2 agency.

W-2 agencies must determine, based on the outcome of a W-2 participant's employability screening and education and career assessments, if a W-2 participant is more appropriate for SSI and/or SSDI than employment services. If the W-2 participant is more appropriate for SSI and/or SSDI, and the W-2 participant agrees to apply for SSI/SSDI, then in Milwaukee County the W-2 participant is referred to the SSI/SSDI Advocacy Agency for services, and in the balance of state (outside Milwaukee County) the W-2 agency provides SSI/SSDI advocacy services to facilitate timely approval for SSI/SSDI.

Technical College Participation Under CSJ and W-2 T

If the agency determines that an individual is unable to obtain unsubsidized employment without additional training, the participant may be allowed to participate in a technical college education program for a maximum of two years if the agency has determined that the program will likely lead to employment. An individual placed in a CSJ or W-2 T may participate in a technical college education program as part of that placement if all of the following requirements are met:

1. The participant maintains full-time status in the technical college education program, as determined by the technical college the participant attends, and regularly attends all classes;
2. The participant maintains a grade point average of at least 2.0 (or the equivalent, as determined by the technical college); and
3. The participant is employed or engages in work activities under a CSJ or W-2 T for twenty-five (25) hours per week in addition to class time.

Assistance to Custodial Parent of an Infant

A custodial parent of a child who is twelve (12) weeks old or less and who meets the financial and non-financial eligibility requirements for W-2 work training placements may receive a monthly payment of six hundred seventy-three dollars (\$673) and will not be required to participate in an employment position unless s/he volunteers to participate. A parent may only receive the custodial parent of an infant benefit if no other adult member of the custodial parent's W-2 group is participating or eligible to participate in a W-2 work training placement or working in an unsubsidized job.

The custodial parent is eligible for benefits beginning on the date of the child's birth or the W-2 application date, whichever is later. If the parent is still eligible for W-2 and not able to obtain unsubsidized employment when the child reaches twelve (12) weeks, s/he may be immediately placed in a W-2 work training placement.

Assistance to Women with an At Risk Pregnancy

Effective January 1, 2010, pregnant women eligible for the At Risk Pregnancy placement may receive a monthly payment of six hundred seventy-three dollars (\$673). To be eligible, the woman must be unmarried, meet the financial and non-financial eligibility requirements for W-2 except she does not have custody of any dependent children, and provide medical verification of her third trimester at-risk pregnancy which results in her inability to work. She will not be required to participate in an employment position.

The participant in an At Risk Pregnancy placement is eligible for benefits beginning on latest of the following dates: the date she met the eligibility requirements for W-2, the beginning date as specified by her physician in the medical verification for her at risk pregnancy which results in

her inability to work; or the beginning of the three months prior to her estimated delivery date as specified by her physician in the medical verification (i.e. the third trimester of her pregnancy). After the birth of her child, if the woman continues to be eligible for W-2, she may immediately be assigned to Custodial Parent of an Infant services.

Two-Parent Family Participation

W-2 philosophy strongly emphasizes the responsibility both parents have to care for and support their children. The first parent, the parent placed in a W-2 employment position, must participate in up to forty (40) hours of W-2 activities per week. If the family is also receiving federally funded child care, the other parent must participate in W-2 activities equal to the difference between fifty-five (55) hours and the number of hours the parent who is placed in the employment position participates in assigned activities per week. The other parent may be assigned to activities including unsubsidized employment, on-the-job training (which is non-W-2 funded) or work training experience. Additional activities above the minimum required may be assigned based on a determination by the FEP that the activities will best prepare the other parent for unsubsidized employment.

The other parent in a two-parent family not receiving federally funded child care may be offered the opportunity to participate in W-2 activities, but participation is not mandatory. If the offer to participate in activities is accepted, the FEP identifies appropriate activities for both parents taking into consideration the schedules of the parents and children in order to accommodate the family's request not to receive child care.

OTHER ELEMENTS OF W-2 WORK-BASED PARTICIPATION

Employability Plan (EP)

An EP outlines employment goals developed jointly by the FEP and the participant. The EP may also identify basic and immediate family needs (food, clothing, shelter, health care, etc.) that are needed before the family can expect to achieve and/or maintain economic stability.

W-2 Screening and Assessment

Under W-2, assessment is the process of gathering the needed information to develop an EP customized for the participant that will result in either a successful employment outcome which starts the individual on a career path, or, if appropriate, a path to eligibility for SSI and/or SSDI benefits.

Certain types of screening and assessment are required for all W-2 applicants and participants, including:

- Informal Assessment;
- Educational Needs Assessment; and
- The offer to complete the Barrier Screening Tool (BST).

The information gathered through these required processes will assist the FEP in identifying whether additional Formal Assessments are needed to develop the participant's EP.

Informal Assessment

The purpose of the informal assessment under W-2 is to gather information about an individual and his or her family to determine the:

- Individual's ability to become employed and remain employed;

- Services and activities necessary for the individual to become employed and remain employed;
- Appropriate placement of a participant in a W-2 employment position;
- Need for further career assessment and planning;
- Need for vocational evaluation; and
- Need for a formal assessment of any disabilities or other employment barriers by a qualified assessing agency or individual.

Informal assessment is an ongoing case management practice which starts during the W-2 application period and continues until the individual no longer receives W-2 services.

Educational Needs Assessment

Agencies must conduct an educational needs assessment with all new applicants who meet financial and non-financial eligibility for W-2. The educational needs assessment must always be completed before making a W-2 placement decision. The assessment must:

- 1) Identify the applicant's current education and training levels; and
- 2) Determine the applicant's education and training needs considering the following:
 - A. The information gathered on the applicant's current education and training levels;
 - B. The level of education and training necessary to obtain full-time employment in the local labor market; and
 - C. The applicant's personal employment goals.

Education and training activities must be included in the individual's EP if the FEP determines that the individual is eligible for W-2, that s/he is interested in pursuing education or training, and that s/he needs or would benefit from education or training activities, including a course of study meeting the standards established for the granting of a declaration of high school graduation.

Barrier Screening Tool

The W-2 Barrier Screening Tool (BST) is used to identify the potential presence or risk of a personal barrier to normal functioning in an employment setting. The responses to the BST questions provided by each applicant or participant will assist the FEP in determining if the individual could benefit from a formal assessment by a professional. Formal assessment results will enable the FEP to make a more informed decision about the individual's W-2 placement, the activities s/he is assigned to and any special services or work site accommodations that s/he may need. The BST is voluntary and applicants/participants may decline part or all of the BST.

There are four sections to the BST:

1. Domestic Abuse Screen: This section of the screening helps the FEP and participant determine if a referral for a domestic abuse assessment and services is needed.
2. Functional Screen: This section screens participants for their ability to function in a work setting, work training and daily living activities. Specific instructions are provided in the screening tool to help the FEP determine if a formal assessment is needed and whether a participant must complete Screen 2.
3. Screen 2: This section screens participants to determine if they are at-risk for barriers that often go unidentified, including mental health issues, learning needs, post-traumatic stress disorder, traumatic brain injury, and alcohol or other drug abuse. Screen 2 is only completed when the Functional Screen indicates it would be helpful. Specific instructions are provided in Screen 2 to help determine if a referral for formal assessment is needed.

4. **Family Needs Screen:** The Family Needs questions assist the worker with gathering information about special needs of other family members in the household that may affect W-2 activities and the participation schedule to which the participant is assigned. The information gathered may also lead to referral for services by other community providers as determined by the worker.

Formal Assessment

A formal assessment is the process of establishing:

- The extent and severity of any disabilities or other conditions (e.g. domestic violence, learning needs, need to care for a child with disabilities) which may interfere with normal functioning in an employment setting or with a person's ability to meet W-2 program requirements;
- The effect of a disability or other potential barrier on the person's capacity to obtain and maintain unsubsidized employment, participate in employment-related activities (e.g. work training activities or education) or otherwise meet W-2 program requirements;
- The need for supportive services, accommodations, auxiliary aids or communication assistance;
- The conditions under which the person is capable of employment or employment related activities;
- The need to make reasonable modifications to policies, practices and procedures when necessary to ensure equal opportunity for people with disabilities; and
- The appropriateness of specific assignments in the W-2 program.

The formal assessment process may include gathering information about the participant from one or more qualified assessment agencies or individuals.

A FEP can determine the need for a formal assessment at any point, however a formal assessment is required when:

1. The applicant or participant discloses a medical condition or other barrier to employment that necessitates further assessment or definitive diagnosis by a qualified assessing agency or individual;
2. A participant is placed in a W-2 T position. Participants placed in W-2 T must have a formal assessment scheduled and documented in CARES within 30 calendar days of placement into W-2 T.
3. The FEP identifies or observes, through the ongoing informal assessment process, cues that necessitate further assessment or definitive diagnosis by a qualified assessing agency or individual; or
4. The BST results indicate that a formal assessment is needed.

W-2 Fact Finding Process

The W-2 fact finding process provides the opportunity for applicants and participants who have been adversely affected to be heard in a State appeal process. Wisconsin's Fact Finding process can be found in Chapter 19 of the W-2 Manual at <http://dcf.wisconsin.gov/w2/manual/default.htm>.

Individuals who believe that an agency decision regarding any component of W-2 (e.g., employment positions, Job Access Loans, Child Care, and Emergency Assistance) is incorrect may request a Fact Finding review by the W-2 agency. The W-2 agency must respond by

completing an expeditious review of the case to prevent harm to the client in the event of an agency error. The Fact Finding review is an informal process to resolve issues, explain the proposed action or inaction, and permit the petitioner to present information. Each W-2 agency must have at least one individual assigned to complete Fact Finding reviews. The fact finder must be neutral and provide an objective review and decision on the Fact Finding request. W-2 agencies are bound by the Fact Finding decision for a particular case and must comply with the decision within ten (10) days of the decision date.

A second level of review is completed by the Department of Administration, Division of Hearings and Appeals (DHA) if the applicant or participant petitions the DHA for a review of the W-2 Fact Finding decision. This review is limited to a review of the record and the decision of the fact finder. The W-2 agency may also request DHA to review a Fact Finding decision. Review by DHA must be requested within twenty-one (21) days of the Fact Finding decision date.

If a Fact Finding decision overturns the agency's action of denying W-2 payments at either level of review, the W-2 agency shall place the individual in the first appropriate employment position. Payment begins on the date the individual begins participation and no retroactive cash payment for the period prior to participation shall be issued. The W-2 agency is required to restore any payments that were improperly calculated, reduced or terminated retroactive to the date of occurrence.

Civil Rights Compliance and Affirmative Action

In addition to the Fact Finding process, each W-2 agency must meet Civil Rights Compliance and Affirmative Action requirements. (See IV. Civil Rights Compliance, Affirmative Action and Complaint Resolution.)

Labor Standards

W-2 employment and work training placements (Trial Jobs, CSJs, or W-2 Ts) are required to not:

- Fill a vacancy created by an employer terminating a regular employee or otherwise reducing its workforce for the purpose of hiring an individual in a W-2 employment position;
- Fill a position when any other person is on layoff or strike from the same or a substantially equivalent job within the same or a substantially equivalent job within the same organizational unit; or
- Fill a position when any other person is engaged in a labor dispute regarding the same or a substantially equivalent job with the same organization unit.

All work training providers/employers must:

- Inform their regular employees of their right to file a displacement grievance under the Wisconsin Works Employee Displacement Grievance Policy;
- Inform W-2 agencies of the notification method being used; and
- Follow the provisions of the Wisconsin Works Employee Displacement Grievance Policy to address complaints, by regular employees of the work training site/employer, of displacement in violation of the three requirements above.

Section 9.3 of the W-2 Manual which provides a link to the Wisconsin Works Employee Displacement Grievance Policy can be found at <http://dcf.wisconsin.gov/w2/manual/default.htm>.

Child Care and W-2 Participation

A single parent placed in a CSJ or W-2 T position cannot be assigned work activities during a period of time s/he is unable to obtain child care for a child under the age of thirteen (13). However, the participant may be assigned to other activities which may be performed in the home. FEPs must track these participants closely to ensure they are placed in work activities as soon as a child care provider has been located.

An inability to obtain child care must be based on the following reasons:

1. Formal child care is not available within a reasonable distance from the parent's home or work site. Formal child care means at least one licensed or certified child care facility with space available for the child for whom there is no documentation that the facility would be harmful to the health or safety of the child.

Reasonable distance means no more than 60 minutes travel time one-way, using available transportation, from the parent's home to the child care provider's location to the parent's work site. Travel time may be extended up to 90 minutes one-way if there is a good placement opportunity for the participant and the participant is willing to enter into this arrangement.

and

2. Informal child care by a relative or under other arrangements is unavailable or unsuitable. Informal child care is defined as an arrangement in which the child care provider is neither licensed nor certified. Participants who use this type of arrangement are not eligible for W-2 child care assistance. Informal child care arrangements may be used by any W-2 participant; however, a participant cannot be required to use informal child care.

If the participant fails to demonstrate an inability to obtain child care, s/he must resume W-2 work activities or face payment reductions for nonparticipation.

Wisconsin provides child care subsidies to families whose income is less than one hundred eight-five (185) percent of the FPL regardless of whether they are or have been on W-2. Families may remain eligible with income up to two hundred (200) percent of the FPL. There are no time limits for family eligibility. Parents in W-2 child care have the option of selecting a child care provider from a wide variety of choices. Eligibility for child care is generally determined by W-2 agencies.

In addition to using the Child Care Development Fund (CCDF) and state general purpose revenues, TANF funds are also used to pay for child care for participants in W-2 and for low-income working parents. The child care subsidy is not counted as assistance for parents in unsubsidized employment. Child care subsidies paid for by TANF funds will be governed by the same policies as subsidies funded by CCDF. These policies include eligibility criteria (but no asset test) as well as a co-payment requirement provision. Wisconsin plans to transfer funds from the TANF block grant to the CCDF as allowed under PRWORA.

Community Involvement

Community involvement is another key aspect of the W-2 program. Collaboration between employers, community resources, the business community, advocate groups and government programs creates an environment that translates into jobs and positive community involvement for low-income workers statewide. Community Steering Committees are public/private partnerships established under legislation to provide ties to W-2 agencies, with strong leadership from the business sector. They serve as problem-solving boards to the local

agencies and collaborate with the Children's Services Network, which provide information about community resources available to W-2 participants and their families.

CASE MANAGEMENT SERVICES

Learnfare Case Management Services

Learnfare is a component of the W-2 program that requires all school age children of W-2 participants to be enrolled in school. Students who are not enrolled in school or who are dropouts, returning dropouts, habitual truants or minor parents are required to participate in case management. Learnfare case management focuses on services to maintain school enrollment, improve school attendance and prepare children for a career. For high school students, Learnfare case management focuses on graduation, career and/or employment planning, job readiness and job seeking/job retention activities. For minor parents, Learnfare case management also focuses on parenting and life skills. A financial penalty may be imposed for not being enrolled in school or not participating in case management, if required to do so. The financial penalty is in the amount of fifty dollars (\$50) per month per child, not to exceed one hundred dollars (\$150) per W-2 group per month. A financial penalty must not be imposed on students who volunteer for case management. The FEP or Learnfare specialist determines if a student and his/her parent had good cause for failing to cooperate with Learnfare case management.

Case Management for Pregnant Women

A pregnant woman whose pregnancy is medically verified and who is both non-financially and financially eligible except that she is not a custodial parent of a dependent child is eligible for job search assistance and case management services provided by the W-2 agency. Case management services may include making the appropriate referral to access child care or discussing employment goals for the W-2 group when the child is over twelve (12) weeks. The woman cannot be required to participate in an employment position until the child is twelve (12) weeks old. There is no penalty for non-cooperation with child support for a pregnant woman or while the child is less than sixty (60) days old. (See section above on Assistance to Women with At Risk Pregnancy.)

Minor Parent Case Management

Custodial parents are not eligible to participate in a W-2 work training placement until they have reached the age of eighteen (18). By eliminating eligibility for cash assistance for a minor, W-2 has created a stronger tie of responsibility to the adult parent and a better opportunity for the minor parent to complete high school and prepare for a career.

A custodial minor parent is eligible, regardless of income, assets, or living arrangement to meet with a FEP, who can provide a minor parent with information about available child care services, high school and school-to-work preparation, employment and financial planning, family planning services, community resources and eligibility for Medicaid, FoodShare and other food and nutrition services.

A minor parent living independently is counseled by the W-2 agency on the importance of living in an adult-supervised living arrangement, beginning with the assumption that the best option is for the minor to live with his or her parent(s). If needed, other living arrangements are discussed, such as living with a Kinship Care relative. In some cases, the W-2 agency must refer the minor parent to child welfare authorities and advocate for locating a suitable living arrangement.

Non-custodial Parent (NCP) Case Management

W-2 NCP case management is a voluntary program for the unemployed or underemployed NCPs. The W-2 agency may provide job search assistance and employment and training assistance as part of the case management provided to non-custodial parents to facilitate entry into the labor market and increase capacity to make consistent child support payments for the benefit of the minor child(ren). The goal is to enable W-2 custodial parents to become self-sufficient by ensuring regular child support payments in combination with employment. In addition, it is expected that by meeting their financial obligation, non-custodial parents will also demonstrate enhanced contact with, and emotional investment in their children.

In order for a NCP to be eligible for these services, s/he must be under a current child support order or in the process of having one established, and the custodial parent must be a W-2 participant.

OTHER W-2 PROGRAM SERVICES

Employment Transportation Program

Reliable, affordable and efficient transportation is critical to achieving economic stability. Wisconsin has made it a priority to work with job seekers, employers and local service providers to address transportation needs for low-income families. Employment and training staff (W-2 agencies, Job Centers, other local partners) work with Community Steering Committees, Children's Services Networks, existing transportation service providers, Regional Planning Commissions, Metropolitan Planning Organizations and employers to determine the best use of existing resources and the best methods to meet the employment transportation needs in their communities.

W-2 agencies use innovative methods to meet participant transportation needs such as arranging van pools, setting up volunteer driver programs, accessing loan resources for personal vehicle purchase and repair, encouraging employer-based transportation programs, expanding transit hours and service areas and hiring transportation coordinators. These programs are available to people who are enrolled in a component of the W-2 program and are generally offered on an individual basis.

Credit Establishment and Credit Repair Assistance

Financial literacy services, which include training on budgeting, obtaining and managing credit and overall money management, are one of the supports W-2 participants need to achieve and maintain economic stability. To address this need, W-2 agencies provide or contract with another entity to provide credit establishment and credit repair assistance to W-2 participants to ensure their financial stability.

B. WISCONSIN'S OTHER TANF PROGRAMS AND SERVICES

Child Support Pass-Through

DCF administers the Child Support program. Cooperation with the child support agency is a requirement for receipt of W-2 services. Child support received by the family is not used to determine eligibility for W-2 and does not affect W-2 payments.

Effective October 1, 2006, Wisconsin passed through the full state share of child support collected for the month, with the pass-through amount adjusted each year to the current state share percentage amount.

Due to changing federal requirements and increased federal financial participation, the Wisconsin 2009-11 Biennial Budget Act (2009 Wisconsin Act 28) changed the passed-through percentage of collected past-due and current child support. Effective April 1, 2010, one hundred (100) percent of collected past-due child support will be passed-through to former W-2 participants. Also, effective October 1, 2010, seventy-five (75) percent of collected child support will be passed-through to current W-2 participants. DCF is developing a plan to communicate these changes to custodial parents, non-custodial parents, W-2 agencies and other partners who work with affected families.

Job Access Loans

DCF provides Job Access Loans (JALs) which are short-term interest-free loans that are intended to meet immediate and discrete expenses that are related to obtaining or maintaining employment. In order to be eligible for a JAL, the applicant must meet W-2 financial (one hundred fifteen [115] percent of the federal poverty level [FPL]) and non-financial eligibility requirements and the additional JAL eligibility criteria listed below. JALs are administered through the local W-2 agency office but are not limited to those receiving W-2 benefits and services. The W-2 agency can approve a JAL from twenty-five dollars (\$25) to one thousand six hundred dollars (\$1600). Some examples of appropriate use of JALs include:

- Car loans for purchase of a vehicle or repairs to provide transportation to work or to look for work;
- Fees for obtaining a drivers license;
- Clothing/uniforms for work; and
- Self-employment/entrepreneurial activities. As a condition of any self-employment or entrepreneurial loan, the W-2 agency must require a business plan approved by a traditional loan institution or an organization specializing in entrepreneurial efforts, such as the Wisconsin Women's Business Initiative Corporation or the National Foundation for Training Entrepreneurship.

JAL applicants who meet the W-2 financial and non-financial eligibility requirements are not entitled to a JAL, however they may be approved for a JAL provided the intended use meets a purpose of the JAL program. The loan recipient must develop a repayment plan approved by the W-2 agency. The loan may be paid back in cash or through a combination of cash and volunteer community work.

Emergency Assistance

The Emergency Assistance (EA) program, administered by DCF, is designed to meet the immediate needs of needy families facing a current emergency. The emergency must be due to fire, flood, natural disaster, energy crisis, impending homelessness, or homelessness. EA is intended to avoid destitution of a child and provide living arrangements for the child in a home. W-2 agencies are responsible for administration of EA, however, all eligible families may receive Emergency Assistance. EA is not limited to families receiving benefits and services under the W-2 program or any other form of public assistance.

An EA group must contain a child under age eighteen (18) and a caretaker relative with whom a child is living. Each member of the EA group must be a resident of Wisconsin and a citizen or

qualifying alien, as defined under W-2 policy. The EA group must meet the EA financial eligibility criteria (at or below one hundred fifteen [115] percent of poverty) modeled after the W-2 financial eligibility criteria. The amount of the EA payment is the lower of:

- the maximum payment amount based on the group size (five hundred sixteen dollars [\$516] for a group with two through four members, five hundred forty-five dollars [\$545] for a group with five members, or one hundred ten dollars [\$110] per group member for a group with six or more members);
- the amount requested by the group (effective January 4, 2010, the amount requested by the group will be eliminated from this calculation); or
- the total financial need due to the emergency.

The actual amount of necessary unpaid monthly expenses (generally including housing costs and may include food, utilities, transportation, medical costs, etc depending on the emergency type) is considered when determining the total financial need of the group. If an individual does not agree with the agency's decision regarding EA eligibility or payment amount, a W-2 Fact Finding Review may be requested.

Kinship Care

DCF provides a cash benefit called a Kinship Care payment to relative caretakers of a minor. The Kinship Care program provides allocations to counties to manage the assessments and payments to families. eWISACWIS is an automated system that assists caseworkers and administrators in managing child welfare services, including intake, eligibility determinations, case management, court processing, financial reporting, and administration. TANF funds are used to support the portion of implementation and ongoing support costs related to the Kinship Care program.

The Kinship Care program preserves the ability to place children with relatives while providing appropriate oversight of placements to ensure children's safety and well-being. Kinship Care supports the concept of children residing with a relative to alleviate family stress or family problems, rather than children being placed in a foster home or other type of out-of-home placement, unless foster care placement or other out-of-home placement is in the best interests of the child.

Kinship Care can be either court-ordered, as an alternative to a foster care placement, or be voluntary based on the circumstances of individual families. Relatives receiving Kinship Care have no work requirements.

Under Kinship Care, relative caretakers are eligible for a monthly benefit if all of the following conditions are met:

1. The Kinship Care relative applies to the county or tribal social/human services child welfare agency. The agency completes an assessment and determines if there is a need for the child to be placed with the Kinship Care relative and if the placement with the Kinship Care relative is in the best interest of the child.
2. The county or tribal social/human services agency determines that the child meets one or more of the criteria specified in s. 48.13, Wis. Stats., or s. 938.13, Wis. Stats., or that the child would be at risk of meeting one or more of those criteria if the child were to remain in his or her home. (Note: These statutory sections relate to children in need of protection or services. The chapter numbers relate to the Children's Code and the Juvenile Justice Code.)

3. The county or tribal social/human services child welfare agency conducts a criminal background check on the Kinship Care relative, any other adult resident of the Kinship Care relative's home and any employees or prospective employees of the Kinship Care relative who have or would have regular contact with the child. The primary purpose of the background check is to determine if they have any arrests or convictions that could adversely affect the child or the Kinship Care relative's ability to care for the child.
4. The Kinship Care relative cooperates with the county or tribal social/human services agency in the application process, including applying for other forms of assistance for which the child may be eligible.
5. The child for whom the Kinship Care relative is providing care and maintenance is not receiving supplemental security income (SSI) or state supplemental payments.

The Kinship Care payment amount is similar to previous AFDC payment levels in Wisconsin--two hundred fifteen dollars (\$215) per child per month. In addition, Kinship Care children are categorically eligible for Medicaid and FoodShare benefits.

As a child-only benefit, there is an assumption that these children are truly needy and generally have no income of their own with the possible exception of child support. If the child support payment exceeds two hundred fifteen dollars (\$215) (amount of Kinship Care benefit per child), the child is not eligible for Kinship Care. The income and assets of Kinship Care relative caretakers are not considered in the Kinship Care eligibility determination. A Kinship Care eligibility review must be completed at least every twelve months.

FoodShare to Qualified Aliens

Using one hundred (100) percent state funds, DCF in cooperation with the Wisconsin Department of Health Services (DHS), provides FoodShare benefits to qualified aliens and their dependent children who do not qualify for federal public assistance under sections 401 and 403 of PRWORA. The following qualified aliens may be eligible for W-2 based on section 411 of PRWORA, subject to the same eligibility determination used for citizen applicants under sections 401, 402, 403 and 431 of PRWORA:

- An alien lawfully admitted to the United States for permanent residence under the Immigration and Nationality Act;
- An alien granted asylum under section 208 of such Act;
- A refugee admitted to the United States under section 207 of such Act;
- An alien paroled into the United States under section 212(d)(5) of such Act;
- An alien whose deportation is being withheld under section 243(h) or 241(b)(3) of such Act;
- An alien granted conditional entry pursuant to section 203(a)(7) of such Act as in effect prior to April 1, 1980;
- An alien who has been certified as a victim of trafficking;
- An alien who is granted status as a Cuban and Haitian entrant, as defined in section 501(e) of the Refugee Education Assistance Act of 1980;
- An American Indian born in Canada who is at least 50% American Indian by blood, or born outside of the United States who is a member of a federally-recognized Indian tribe;
- A alien who has been battered or whose child has been battered;
- An alien admitted to the United States as an Amerasian immigrant, as described in section 584 of the Foreign Operations, Export Financing, and Related Programs Appropriations act of 1988;

- An alien lawfully residing in the United States who is an honorably discharged veteran, in active duty in, or the spouse or unremarried surviving spouse (under specified circumstances) of a veteran or active member of the U.S. armed forces; or
- An alien lawfully residing in the United States who is authorized to work by the Immigration and Naturalization Service.

(Note: FoodShare is the updated Wisconsin program name previously referred to as Food Stamps.)

SSI Caretaker Supplement

DHS administers the SSI Caretaker Supplement (CTS) program. DHS provides an additional monthly payment to help with the support of SSI recipients' dependent children. Referred to as the SSI Caretaker Supplement program, it is administered by the Wisconsin Department of Health Services which also administers the state's SSI activities. Payments are made to families based on the following criteria:

1. The child's sole custodial parent receives SSI or the child lives with both custodial parents and both receive SSI. In either circumstance, the caretaker(s) receive two hundred fifty dollars (\$250) for the first eligible child and one hundred fifty dollars (\$150) for each subsequent eligible child.
2. The child meets financial and non-financial AFDC eligibility criteria. If the family passes the AFDC eligibility test, the CTS payment is made.
3. The child does not receive SSI benefits.

Student Food Programs

The Wisconsin Department of Public Instruction (DPI) administers state funded food programs in the public schools for students who meet the federal free and reduced lunch criteria. Free milk and breakfast is provided on a daily basis to eligible low-income students attending school from pre-K to grade five. The state funded school breakfast program is for students who meet the federal income criteria of the free and reduced school lunch program however these students do not meet the other requirements of the federal free and reduced school lunch program.

Energy Services

The Wisconsin Department of Administration (DOA) provides payments to utility companies and other energy suppliers on behalf of needy families, reconnection services, crisis intervention services (i.e. furnace replacements), and weatherization services. Eligible needy families are families with children and income at or below one hundred fifty (150) percent of the federal poverty level (FPL).

Earned Income Tax Credit

Beginning in FFY 1999, the Wisconsin Department of Revenue (DOR) began providing an earned income tax credit to low-income working families. The refundable portion of the tax credit is counted as state maintenance-of-effort (MOE) for purposes of the state's TANF MOE requirements. (Note: Nonrefundable amounts and earned income tax credit payments made to qualified aliens are paid for with state general purpose revenue.)

This credit provides a supplement to the wages and self-employment income of lower-income workers who have children living with them. Under the Wisconsin program, persons may be eligible to receive the tax credit if they or their spouse worked full or part-time during the tax

year, had at least one qualifying child, were a full-year resident of Wisconsin, and qualified for the federal Earned Income Credit.

Brighter Futures

Under the administration of DCF, the Brighter Futures programs award state-funded grants to nonprofit corporations and public agencies in Milwaukee County, and county social services agencies in other counties. These grants fund programs for the prevention of youth violence, substance use and abuse, child abuse and neglect, and non-marital pregnancy, and for the promotion of adolescent self-sufficiency for pregnant adolescents.

Brighter Futures supports positive youth development and prevention programs in high-risk communities and high-poverty neighborhoods. Programs serve infants, children, youth, and families, and focus on increasing adolescent functioning by encouraging high school graduation, vocational preparedness, improved social and other interpersonal skills, and responsible decision-making.

Participant-centered case planning creates buy-in from program participants. Personalized care is designed for each participant using culturally appropriate case plans and activities targeting the participant's strengths and needs, with support from the family and other sources.

Programs provide an array of services including:

- Adolescent parent self-sufficiency and pregnancy prevention;
- Substance abuse prevention and treatment;
- Child Respite Care;
- Family preservation and support services;
- Choices for girls and young women;
- Empowerment of individuals, families, and communities to overcome effects of poverty;
- Domestic abuse prevention and education; and
- Coordination with county and private social and mental health services.

Boys and Girls Club

DCF provides grants to the Boys and Girls Club of America operating in Wisconsin to provide services to improve the social, academic and employment skills of low income youth. Families that meet income eligibility requirements for the free and reduced school lunch program may participate in a full range of youth opportunities.

Domestic Violence Services

DCF administers state and federal funds for the purpose of providing support services to victims of domestic violence. Grants are provided to local agencies for victims and their children who have witnessed domestic violence; are in need of legal advocacy; and are in need of programming to help them achieve both safety and self-sufficiency. Funding is also provided to the Wisconsin Coalition Against Domestic Violence to support a staff person to provide assistance in obtaining legal services for victims from under-represented populations. Those eligible for TANF services are at or below two hundred fifty (250) percent of the federal poverty level (FPL).

Children First

DCF administers the Children First responsible fatherhood program which promotes the emotional and financial responsibility of the non-custodial parent to his or her children. The

Children First program operates through a voluntary partnership with the administering Children First agency (often a W-2 agency), the child support agency, and the county/tribal judicial system.

The court may order the non-custodial parent, who is behind in child support payments and is unemployed or under-employed, to participate in the Children First program. Judges are given the discretion to determine which non-custodial parents should be referred to the program based on their lack of financial resources and, therefore, no uniform income eligibility requirements have been set.

The program provides, at a minimum, job search assistance, work experience, education, training opportunities and case management services designed to enable eligible non-custodial parents to obtain and retain employment. The Children First program is successfully completed when a participant makes full child support payments for three consecutive months or completes 16 weeks of employment and training activities. If these goals are not achieved, the participant may be referred to court for appropriate disposition.

Burial Services

The Wisconsin Department of Health Services (DHS) administers the Wisconsin Funeral and Cemetery Aids Program (WFCAP) which provides funding to needy families when the estate of the deceased recipient is insufficient to pay the funeral and cemetery expenses. DHS reimburses funeral and/or cemetery expenses of a person who, on the date of death, was: 1) A W-2 subsidized employment and training participant; or 2) A child on whose behalf there were benefits from Caretaker Supplement (CTS) or Kinship Care.

The program may pay the lesser of one thousand dollars (\$1,000) or the cemetery expenses that are not paid by the estate of the deceased and/or other persons. No payment is made for cemetery expenses if the costs for cemetery expenses exceed three thousand five hundred dollars (\$3,500). The program may pay the lesser of one thousand five hundred dollars (\$1,500) or the funeral expenses not paid by the estate of the deceased and/or other persons. No payment is made for funeral expenses if the costs for funeral expenses exceed three thousand five hundred dollars (\$3,500) [s. 49.785, Wis. Stats.]. Funeral and cemetery expenses are paid with state funding, which Wisconsin includes in its maintenance of effort (MOE) calculation.

Support Services to Needy Students

The Wisconsin Department of Public Instruction (DPI) provides a number of services to needy pre-kindergarten (per-K) through grade twelve (12) students including:

- **Pre-K Services to Low Income Students**

The Wisconsin Department of Public Instruction (DPI) provides equalization aids, transportation aids, four-year old pre-K grants to its public schools, and vouchers for private schools in Milwaukee County for students in pre-K. The schools that offer pre-K to its students have a high percentage of free and reduced lunch students who are typically high risk students.

It is optional for the public schools to use equalization and transportation funds to provide pre-K education to three and four-year old children. Although optional for school districts to offer pre-K, it must be available to all if it is offered. Those included for TANF meet federal criteria for free and reduced lunches.

The Milwaukee Parental Choice Program (MPCP) is Wisconsin's school voucher program which started in 1990. It reimburses low-income parents for their children to attend private for-profit and non-profit and/or religious schools instead of the Milwaukee District Schools, and includes pre-K. MPCP is a one hundred (100) percent low income program for those at or below either one hundred seventy-five (175) percent or two hundred twenty-five (225) percent of the federal poverty level (FPL). The FPL for MPCP depends on whether the student is new to the program, is continuing, or has siblings already in the program.

Four-Year Old Kindergarten Start-Up Grants started in school year 2008 to encourage school districts to offer pre-K to four-year old children. This is a competitive grant program which provides one year of initial costs and one year of continuation costs. Those included for TANF meet federal criteria for free and reduced lunches.

- **High Poverty/High Need K – Twelve (12) Educational Programs**
DPI administers a variety of categorical aids targeted to high poverty districts, to traditionally underrepresented students, and/or to students likely to end up in poverty without additional support. Each of these programs has unique qualifiers however each is intended to provide additional educational support to improve academic achievement and reduce future poverty. Those included for TANF meet federal criteria for free and reduced lunches. All of these targeted aids, except the preschool to grade five program, were initiated after 1995:
 - Student Achievement Guarantee in Education (SAGE);
 - SAGE Debt;
 - Aid to High Poverty School Districts;
 - Preschool to Grade Five;
 - Improving Student Achievement;
 - Alternative Education;
 - Supplemental Large Areas;
 - Scarcity Aid;
 - School District Consolidation;
 - Science, Technology, Engineering and Mathematics (STEM); and
 - School Nursing Services programs.
- **English for Southeast Asian Children**
DPI provides state funding to the Wausau School District for a program to teach English to three-, four-, and five-year old Southeast Asian children to promote success in school among families in the Southeast Asian community. Eligible children are the Southeast Asian students receiving free or reduced lunches under the federal free or reduced lunch income criteria.

Milwaukee County Alcohol and Other Drug Abuse Services

The Wisconsin Department of Health Services (DHS) contracts for the provision of alcohol and other drug abuse services to serve the TANF population in Milwaukee County at or below two hundred (200) percent of the federal poverty level (FPL). Special populations include: pregnant women; specialized minority treatment agencies including tribal agencies; injection drug users; correctional clients; and child welfare related service populations.

DHS solicited proposals to provide new or expanded community-based alcohol and other drug abuse treatment programs that meet the special needs of TANF eligible individuals. The grants

were awarded based on the programs' ability to emphasize parent education, vocational and housing assistance and coordination with other community programs and with treatment under intensive care.

TANF Eligible FoodShare Recipients

Wisconsin plans to use TANF funds for employment and training services for FoodShare recipients who: 1) have income at or below one hundred thirty (130) percent of the FPL; 2) are the custodial parents of minor children; and 3) are voluntary participants in the FoodShare Employment and Training (FSET) program. These individuals will be eligible for the same services provided under W-2 with the exception of a placement in a W-2 employment position (i.e., Trial Job, CSJ, or W-2 T). Eligible activities may include job readiness and motivational activities, employment counseling, job seeking skills training, job survival/retention training, life skills training, and short term education and training directly related to employment opportunities.

Safety Services

DCF administers child welfare services in Milwaukee County through the Bureau of Milwaukee Child Welfare (BMCW). All other child welfare services in the state are under the oversight and management of county governmental units. BMCW contracts with a safety service coordinator for each of the three neighborhood service delivery sites in Milwaukee. These coordinators are responsible for managing the safety services program which assists needy families with services to help avoid incidents of child abuse and neglect.

During the period of service, an assigned safety services manager and provider works with the family to assist them in controlling for child safety, stabilizing family functioning, and accessing necessary formal and informal supports. Families receive services that are appropriate to their specific situation as determined by the assessment social worker and the safety services manager. Due to the importance and nature of this program, there are no financial eligibility requirements for a family to receive these services under TANF. Therefore Wisconsin uses one hundred (100) percent TANF funds for this program (per federal requirements).

Child Welfare Prevention Services

In Milwaukee, a grant is provided to the Milwaukee Health Department to support the Empowering Families-Milwaukee Home Visiting Program. This program is funded with the purpose of avoiding incidents of child abuse and neglect. Services are targeted to the six zip code areas within the city that have the lowest income levels, high rates of child abuse and neglect referrals, and poor birth outcomes. Services are provided through an enhanced multi-disciplinary model with special emphasis provided to pregnant women and post-partum women.

In addition to home visiting services, there also are grants to community based organizations for services as part of the Brighter Futures program. (See Brighter Futures above.) Due to the importance and nature of this program, there are no financial eligibility requirements for a family to receive these services under TANF. Therefore Wisconsin uses one hundred (100) percent TANF funds for this program (per federal requirements).

Transitional Jobs Demonstration Project

DCF will be administering the Transitional Jobs Demonstration Project which is a subsidized work training program intended to help the participant to overcome employment barriers by providing individuals with a wage-paying, short-term job that combines real work, skills development, and supportive services to successfully transition participants into the labor market. Transitional Job opportunities will be available to individuals who are unable to find

employment in the current labor market due to little or no work history, little education, lack of hard and soft skills, lack of transportation, or a personal crisis. An intermediary agency will contract with the employer and will pay the wage to the participant. The program will be consistent with the Labor Standards discussed above. (See Labor Standards within I.A. W-2 Program.)

The Demonstration Project will provide up to 2,500 transitional jobs in Milwaukee, Dane, Racine, Kenosha, Rock, and Brown Counties. Other regions of the state may also offer transitional jobs, as determined by the Department of Children and Families. Participants of the Demonstration Project will be low-income adults who:

- Are at least twenty-one (21) but not more than sixty-four (64) years of age;
- Are ineligible for Wisconsin Works;
- Have an annual household income that is below one hundred fifty (150) percent of the poverty line;
- Have been unemployed for at least four weeks; and
- Are ineligible to receive unemployment insurance benefits.

DCF currently is working with an advisory committee to finalize the details of the program. Implementation is not expected until the fall of 2010.

III. WISCONSIN'S OTHER PROGRAMS AND SERVICES FOR NEEDY FAMILIES

Wisconsin plans to continue providing state funding for other programs and services to TANF families during the time period of this Plan. Some of these programs may count for TANF as Separate State Programs or TANF MOE if Wisconsin does not receive TANF contingency funds in FFYs 2010 and 2011, or if needed for meeting MOE requirements. Other programs are important in providing support services to the TANF population and support the purposes of TANF, however their nature, level of funding, or the difficulty of tracking TANF eligibility do not qualify to be in the TANF program or Separate State Programs. The programs and services that support TANF purposes are listed below.

Prevention of Unintended Pregnancies

In addition to Wisconsin providing TANF funding for services to address adolescent pregnancy prevention, adolescent parent self-sufficiency, pregnancy counseling and adolescent parenting skills described in this Plan in the W-2 program and Brighter Futures sections, Wisconsin provides funding for other services, which coordinate with the TANF services, to prevent unintended pregnancies.

The Wisconsin Department of Health Services (DHS) in coordination with DCF developed the following dual strategies to address adolescent pregnancy prevention, based on results from currently funded programs and initiatives and consistent with the Healthy Wisconsin 2010 Plan (the State Public Health Plan):

- Encourage and promote delayed sexual activity; and
- Provide access to confidential contraceptive and related reproductive health services to prevent unintended pregnancy among sexually active adolescents.

DHS developed a State Health Plan Implementation Summary titled *Healthiest Wisconsin 2010*. Wisconsin does not use the term "illegitimacy ratio" in its State Health Plan, but does establish a

goal of reducing unintended pregnancies as an outcome objective connected to the broader health priority of reducing high-risk sexual behavior. The goal established for reducing unintended pregnancies in Wisconsin as stated in *Healthiest Wisconsin 2010* is that Wisconsin residents will have thirty (30) percent or less unintended pregnancies by 2010. *Healthiest Wisconsin 2010* can be found at <http://dhs.wisconsin.gov/statehealthplan/hw2010/index.htm>. Wisconsin continues to develop and implement goals in *Healthiest Wisconsin 2010* through the planning process for *Healthiest Wisconsin 2020*. *Healthiest Wisconsin 2020* can be found at <http://dhs.wisconsin.gov/hw2020/>.

Statewide goals by 2010 are:

- Thirty (30) percent or less of Wisconsin high school youth report having had sexual intercourse (reduced from thirty-nine [39] percent in 2001); and
- Reduced unintended teen pregnancies by promoting youth to consistently choose and correctly use contraceptives and barriers from seventy-six (76) percent in 2001 to eighty-seven (87) percent in 2010.

The Adolescent Pregnancy Prevention Committee (APPC) is one of Wisconsin's mechanisms for achieving the goal of reduced adolescent pregnancy. The Committee is co-chaired by DCF and DHS and works in partnership with the Wisconsin Department of Public Instruction (DPI) and a broad range of public and private provider agencies and stakeholders from around the state in the areas of teen pregnancy prevention, abstinence education, and HIV/STD intervention. The link to the APPC website is:
<http://dhs.wisconsin.gov/teenpregnancy/appc/index.htm>.

APPC supports abstinence for Wisconsin youth and supports the specific goal of addressing birth outcome disparities. APPC includes many partner agencies that have various methods to achieve abstinence goals. Abstinence goals include: education and support of professionals and other adults involved in children's lives; and training of educators, including educators in all tribal health centers on the use of an abstinence curriculum developed by Native Americans. Abstinence for youth also is advocated through program collaboration with the City of Milwaukee Health Department, the state Department of Public Instruction (DPI), and STD/HIV/Family Planning workgroups.

APPC also has developed a statewide Wisconsin Adolescent Sexual Health (WASH) Listserv for adolescent reproductive health practitioners and partners; hosted statewide educational teleconferences and youth listening sessions, and developed a website for Data on Wisconsin Youth Sexual Behavior which includes outcomes and summarizes data about Wisconsin teenager sexual behavior and abstinence, STDs and births. The link to the Data on Wisconsin Youth Sexual Behavior website is: <http://dhs.wisconsin.gov/stats/s-behyouth.htm>.

Although minor parents living outside of an adult supervised living arrangement are not eligible to receive cash assistance under W-2, DCF has directed the W-2 agencies to provide case management services to minor parents, regardless of their income, assets, or living arrangement. All minor parents are eligible to meet with a Financial and Employment Planner (FEP) and receive W-2 case management services. Case management may include discussions on family planning, money and time-management, career planning, and parenting and independent living skills. The FEP may also provide a minor parent with information regarding available child care services, high school and school-to-work preparation, community resources, and eligibility for food stamps, other food and nutrition programs and Medicaid.

Eligibility determination for these other programs will be completed according to individual program eligibility rules.

W-2, through its policies, encourages both parents to delay having additional children until the family is more financially secure. There are several ways the W-2 program encourages the prevention and reduction of the incidence of out-of-wedlock pregnancies for the adult population served by W-2: 1) Flat grants: Like employment, W-2 provides cash payments based on participation, not family size. If an individual fails to participate, his or her payment is reduced by five dollars and fifteen cents (\$5.15) per hour. 2) Family cap: W-2 does treat parents who have additional children while on assistance differently. Parents caring for a child under twelve (12) weeks old may be eligible to receive, as a "short term, non-recurrent benefit," a stipend to cover their living expenses that does not carry a work requirement. However, parents receiving such payments are exempt from the state 60-month time limits only if the child is born less than ten months after the individual was first determined eligible for W-2 (or if the birth was the result of sexual assault or incest). Effective January 1, 2010, an At Risk Pregnancy placement will allow short term, non-recurrent benefits to eligible pregnant women. 3) Case management: FEPs may counsel participants to delay subsequent births or provide referrals to family planning services.

As part of the Case Management Training Series, Wisconsin provides a participant guide on Employment-Focused Family Planning. The information is used by W-2 agencies to assist participants in making choices about their career and family, to encourage the use of resources available to families, and to make appropriate referrals based on the family's needs. Each W-2 agency maintains a list of family planning referral agencies and health care providers which is available to all customers.

The Wisconsin Family Planning Waiver is a Medicaid program for women between the ages of fifteen (15) and forty-four (44) whose income does not exceed one hundred eighty-five (185) percent of the poverty level. It covers selected family planning services, including free contraceptive services and supplies, initial family planning office visits, and tests and treatment for sexually transmitted diseases. DHS administers this program.

As defined by the federal government in section 403(a)(2)(C)(iii) of the Social Security Act, Wisconsin's illegitimacy ratio was 0.4 in 2000, 0.5 in 2005 and 2006, and 0.6 in 2007. The source of this data is the Wisconsin Department of Health Services (DHS), Division of Public Health, Bureau of Health Information and Policy, Wisconsin Interactive Statistics on Health (WISH) data query system. This system can be found at <http://dhs.wisconsin.gov/wish/>. The data is from the Birth Counts Module as of 10/2/09.

Scholarships for Low Income Students

The Wisconsin Higher Education Board and private non-profits provide scholarships for low income students to institutions of higher learning to help reduce the incidence of unplanned pregnancies and to assist these students in avoiding future poverty. Eligibility for scholarships is based on eligibility for federal Pell grants.

Prevention of Statutory Rape

Wisconsin provides education, training and services to prevent statutory rape, including:

- The public relations campaigns intended to prevent sexual assault and promote healthy teen relationships, led by the Wisconsin Department of Health Services (DHS) in partnership with

the Wisconsin Coalition Against Sexual Assault. The campaigns are targeted toward men, including boys thirteen (13) through seventeen (17) years old, and other populations.

- Training and in-services provided upon request to educators through the Wisconsin Department of Public Instruction (DPI) on the topic of reporting requirements for sexually active adolescents.
- Materials including a video series titled Sexuality Attitudes and Awareness are used to educate individuals on the legal issues and consequences of violating child sexual assault laws. The programs are used to educate individuals, who may benefit from information on the legal issues and consequences of violating child sexual assault laws and a variety of other information materials, as determined by the courts, a district attorney or a probation and parole officer.
- Wisconsin Statutes require Child Protective Services (CPS) agencies to refer all cases of suspected or threatened child sexual abuse to law enforcement. In turn, the law enforcement agency and CPS must coordinate the planning and execution of the investigation of the report. Any law enforcement agency that determines that criminal action is necessary must refer the case to the District Attorney for criminal prosecution. DCF has continued the CPS standards that describe requirements and guidelines for collaborating with law enforcement agencies in reports of sexual abuse, as well as reports of other forms of child maltreatment.

Emergency Homeless Shelters

Effective October 1, 2009, Wisconsin began providing funding to a homeless shelter located in the Fox River Valley section of the state. The purpose of the funding is to assist families and individuals with services and shelter in order to achieve stability during severe financial hardship.

Homestead Tax Credit

The Wisconsin Department of Revenue (DOR) administers the state funded refundable tax credit for Homestead Credit for residential property tax relief to individuals and families. The definition of property tax relief includes rent. When the credit exceeds taxes due to the state, there is a cash refund. Credits are available to those who are eighteen (18) years or older. Credits are not available for any month the individual received W-2 assistance, although prorated credit can be received for the other non-W-2 months. Other disqualifiers include: receiving farmland preservation credit; living in tax exempt housing; being a nursing home resident; and not being a resident of Wisconsin for the entire preceding year. The Wisconsin legislature establishes financial need by household income and maximum reimbursable property or rent amounts. Families who are eligible for the state's Earned Income Tax Credit also are eligible for the Homestead Tax Credit.

Other Low Income Kindergarten – Grade Twelve (12) Educational Programs

The Wisconsin Department of Public Instruction (DPI) targets other low income kindergarten through grade twelve (12) programs to the TANF population although the programs may or may not meet all TANF requirements for the TANF program or Separate State Programs. These valuable programs, which promote TANF purposes and are planned to continue during the time period of this Plan, are:

- Children at Risk which identifies children who are at risk of not graduating from high school and, annually by August 15th, develop a plan describing how the school board will meet the needs of those students;

- Alcohol and Other Drug Abuse (AODA)/Youth Alcohol Drug Abuse which promotes awareness of the dangers of alcohol and drugs and assist students who abuse them;
- Non-Resident Transfer Aid which promotes racial integration;
- Head Start Supplement which provides funding to existing Head Start programs to reduce waiting lists for child care to support low income parent's work efforts; and
- Bilingual-Bicultural Aid which assists those who need additional support to be successful in English and/or to adjust to a different culture.

Family Reunification

DCF provides Family Reunification services in Milwaukee County as part of a state funded Network Services. Based on the best interests of the child, Network Services are a variety of umbrella services that prepare abused or neglected children who have been removed from their homes and their families for placement into long term stable and supportive living arrangements. Reunification services are services to the child and family when the placements plan is to reunite the child with the child's family. Such services include AODA, mental health, anger management, and family and financial counseling. The state took over these services from Milwaukee County in 1998 as a result of a 1993 lawsuit against Milwaukee County filed by the American Civil Liberties Union (ACLU) and the Children's Rights Project. Different sources such as the AODA block grant and independent living are used first to fund these services depending on the services provided.

Family Foundations

DCF also administers a home-visiting program to prevent child abuse and neglect in nine counties and one Indian tribe through the state-funded Family Foundations Program. This home visiting program has differing characteristics from one agency to another but overall the program stresses long-term outcomes including changes in parent knowledge and behavior, decreased stress, better family functioning, and access and referral to needed services.

Balance of State (Non-Milwaukee County) Alcohol and Other Drug Abuse Services

Through Wisconsin counties, Wisconsin maintains a continuum of alcohol and other drug abuse services including: detoxification, medically monitored residential, transitional residential, day treatment, outpatient, intensive outpatient, narcotic treatment service programs, after care, relapse prevention and recovery support services in counties other than Milwaukee County. For individuals without other resources, these balance of state (non-Milwaukee county) human services or community program agencies provide a safety net of alcohol and other drug abuse services. These include women's treatment, specialized minority treatment agencies including tribal agencies, injection drug users, correctional clients, and child welfare related service populations.

Legal Assistance for Low Income Families For Civil Cases

The Wisconsin Department of Administration (DOA) provides grants to legal services organizations that assist low income families to resolve civil case issues. Examples of the civil issues include juvenile problems, custody, child support, driver's license revocation, and debts.

1995 JOBS Supportive Services Plan Waiver

Wisconsin received federal approval in the federal fiscal year (FFY) 1995 JOBS Supportive Services Plan to include human service expenditures made on behalf of Aid to Families with Dependent Children (AFDC) recipients as eligible for federal reimbursement. Services listed in the Supportive Services plan include child care, family preservation services, and AODA and mental health services not covered under the Medicaid program. The costs of the services are

not covered by Medicaid however are associated with the assignment of non-medical alcohol and drug abuse activities and mental health services.

IV. CIVIL RIGHTS COMPLIANCE, AFFIRMATIVE ACTION AND COMPLAINT RESOLUTION

All of the state programs included in this Plan are administered by Wisconsin Departments and/or their provider agencies. These Departments are the Wisconsin Department of Children and Families (DCF), Wisconsin Department of Health Services (DHS), Wisconsin Department of Public Instruction (DPI), Wisconsin Department of Revenue (DOR) and Wisconsin Department of Administration (DOA). All of these Departments and their provider agencies are required to meet state and federal Civil Rights Compliance (CRC) and Affirmative Action requirements.

Civil Rights Compliance

The Departments and their provider agencies are required to meet state and federal Civil Rights Compliance (CRC) laws, requirements, rules and regulations for their services, including services covered by their contracts and agreements. The CRC requirements for DCF, which are similar to the requirements of the other Wisconsin Departments, include:

- **CRC Letter of Assurance (LOA):** Each provider agency, regardless of size, is required to submit an LOA to ensure that it has implemented state and federal CRC laws, requirements, rules and regulations, for the services covered by the provider agency's contract/agreement, and as a condition for receiving federal and/or state financial assistance from the Department. The LOA must be completed and submitted to the Department by the date specified in the provider's contract/agreement. The date specified is 90 days, the longest period of time to complete one of the required activities, plus two weeks to prepare the submittal of the LOA to the Department.
- **CRC Plan:** Any provider that has twenty-five (25) or more employees and receives a total of twenty-five thousand dollars (\$25,000) or more in total government funding from the Departments is required to complete a CRC Plan. The CRC Plan must be developed and completed in accordance with the instructions provided in the CRC Requirements document (see CRC link below). Effective January 1, 2010, the CRC Plan must be completed and kept on file at the agency, instead of submitted to the Department. All CRC requirements must be met, including the training of all agency staff and the posting of all required notices, prior to the submittal of the LOA. Additional resources and training information can be found at: http://dcf.wisconsin.gov/civil_rights/default/htm.

DCF's requirements for the CRC Letter of Assurance (LOA) and CRC Plan can be found at: http://dcf.wisconsin.gov/civil_rights/plans_instructions.htm.

Affirmative Action Compliance

The Departments and their providers are required to meet the following requirements on Affirmative Action (AA) and non-discrimination, AA Plan, and posting of non-discrimination notice:

- **Affirmative Action (AA) and Non-Discrimination Requirements:** The programs included in this Plan are administered by Wisconsin Departments and/or their providers and are required to not discriminate against any employee or applicant for employment because of age, race, religion, color, disability, sex, physical condition, developmental disability as defined in Wisconsin Statutes s. 51.01(5), sexual orientation or national origin. The AA and non-discrimination requirements include: employment; employment upgrading; employment demotion or transfer; recruitment; advertising; layoff or termination; rates of pay or other

forms of compensation; and selection for training, including apprenticeship. Except with respect to sexual orientation, the providers are further required to take affirmative action to ensure equal employment opportunities.

- AA Plan: The Departments, and each of their providers with contracts that are twenty-five thousand dollars (\$25,000) or more, must submit a written AA Plan. The provider may request exemption from this requirement if the provider has a workforce of less than twenty-five (25) employees. The provider must submit the AA Plan for approval within fifteen (15) working days of award of its contract. Instructions for preparing the AA Plan are available on the Wisconsin DOA website at:
<http://vendornet.state.wi.us/vendornet/contract/contcom.asp>.
- Posting of Non-Discrimination Notice: The Departments and each of their providers must post in conspicuous places, available for employees and applicants for employment, a Contract Compliance poster that specifies the provisions of the State of Wisconsin's non-discrimination law. Failure to comply with the AA/Non-Discrimination requirements may result in the provider being declared "ineligible", termination of the contract or withholding of payment.

Complaint Resolution

Due to the variety and needs of each of the TANF programs in this Plan, there are different complaint resolution processes for program eligibility and participation. For TANF programs within DCF, there generally is an informal step first to resolve the issue quickly and with cooperation. When this process does not resolve the issue, then there is a formal resolution process. For TANF programs provided by other Wisconsin Departments, each Department has its own complaint resolution process.

V. PLAN CERTIFICATIONS

This has been designed to enable the Chief Executive Officer of a State to certify that the State will operate its Temporary Assistance for Needy Families (TANF) program in accordance with the statutory requirements in section 402(a)(2) through (7).

CERTIFICATIONS

The State will operate a program to provide Temporary Assistance for Needy Families (TANF) so that the children may be cared for in their own homes or in the homes of relatives; to end dependence of needy parents on government benefits by promoting job preparation, work and marriage; to prevent and reduce the incidence of out-of-wedlock pregnancies and establish annual numerical goals for preventing and reducing the incidence of these pregnancies; and encourage the formation and maintenance of two-parent families.

This program is generally known as: Wisconsin Works

Executive Officer of the State (Name): Jim Doyle, Governor

In administering and operating a program which provides Temporary Assistance for Needy Families with minor children under title IV-A of the Social Security Act, the State will:

1. Specify which State agency or agencies will administer and supervise the program under

part A in all political subdivisions of the State:

Wisconsin Department of Children and Families (DCF) is the agency responsible for administering the program;

Wisconsin Department of Children and Families (DCF) is the agency responsible for supervising the program;

2. Operate a Child Support Enforcement program under the State plan approved under part D;
3. Operate a Foster Care and Adoption Assistance program in accordance with part E, and certify that the State will take all necessary actions to ensure that children receiving assistance are eligible for medical assistance;
4. Assure that local governments and private sector organizations:
 - (a) Have been consulted regarding the plan and design of welfare services in the State so that services are provided in a manner appropriate to local populations; and
 - (b) Have had at least 45 days to submit comments on the plan and the design of such services;
5. Provide each member of an Indian tribe, who is domiciled in the State and is not eligible for assistance under a Tribal Family Assistance plan approved under Section 412, with equitable access to assistance under the State program funded under this part attributable to funds provided by the Federal Government;
6. Establish and enforce standards and procedures to ensure against program fraud and abuse, including standards and procedures concerning nepotism, conflicts of interest among individuals responsible for the administration and supervision of the State program, kickbacks, and the use of political patronage;

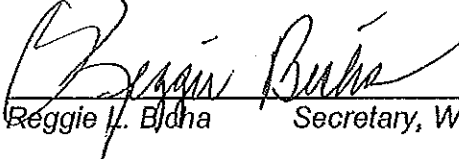
7. OPTIONAL CERTIFICATION

[x] The State has established and is enforcing standards and procedures to:

- (i) Screen and identify individuals receiving assistance under this part with a history of domestic violence while maintaining the confidentiality of such individuals;
 - (ii) Refer such individuals to counseling and supportive services; and
 - (iii) Waive, pursuant to a determination of good cause, other program requirements such as time limits (for as long as necessary) for individuals receiving assistance, residency requirements, child support cooperation requirements, and family cap provisions, in cases where compliance with such requirements would make it more difficult for individuals receiving assistance under this part to escape domestic violence or unfairly penalize such individuals who are or have been victimized by such violence, or individuals who are at risk of further domestic violence.
- Within thirty (30) days after the State amends a plan, the State shall notify the Secretary of the amendment; and

- The state shall make available to the public a summary of the plan.

CERTIFIED BY THE DESIGNEE OF THE CHIEF EXECUTIVE OFFICER OF THE STATE:



Reggie J. Blaha Secretary, Wisconsin Department of Children and Families 2-16-10 Date