



Comprehensive W-2 Agency Review Guide

Sept. 2011 – Dec. 2012

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I. Desk review prior to on-site visit

Review the following items prior to the on-site visit. Comment on anything needing discussion with the agency during the on-site visit.

- Agency's W-2 Plan, including Plan modifications and the annual staffing report. Is the plan up to date? Is the staffing report complete?

Comments:

- Agency's W-2 fraud plan. Is the fraud plan up to date?

Comments:

- Agency's budget and recent CORE expenditure reports. Is the budget up to date? What is the spending pattern for services and administration?

Comments:

- Subcontracts (list significant subcontractors). Is the Agency making effective use of subcontractors to meet the needs of W-2 participants?

Comments:

- Request the Agency to submit local policies and procedures used to operate W-2 and related programs. Does the agency have policies/procedures for items required by the W-2 contract?

Comments:

- Results of ongoing reports monitoring from past 6 months (See Appendix A – List of Reports Monitored). Identify issues that should be discussed with the Agency during the on-site visit.

Comments:

- Review the Agency website to assess accuracy of information and ease with which potential applicants can find information about how to access W-2 and related programs in their area.

Comments:

- Check with the Partner Training Section to determine if the Agency's workers are in compliance with W-2 training requirements.

Comments:

- Review the Agency's W-2 caseload and caseload trend. Over the last 12 months, what has been the average number of cases opening and closing? Is the caseload trend (increasing or decreasing) consistent with local labor market conditions? How does the Agency's caseload compare with the statewide distribution of cases by CMC, CSJ, W-2 T and CMF categories?

- Review unemployment information and trends for the county(ies) served by the agency.
http://dwd.wisconsin.gov/dwd/newsreleases/lmi_release_dates.htm.

Current (most recent) unemployment rate: _____

Unemployment rate one month ago: _____

Unemployment rate one year ago: _____

- Sample a minimum number of randomly selected cases, based on agency size. The case sample should include (to the extent possible):
 - Newly opened case (for CSJ or W-2 T placement)
 - CMC
 - CSJ
 - W-2 T (including long term W2T)
 - CMF
 - Recently closed case (for CSJ or W-2 T placement)
 - Beginning in 2012 – CMJ*

Complete the *W-2 Case Review Tool* for each case. Attach completed case reviews with this W-2 monitoring report and discuss the case reviews with the Agency during the on-site visit.

Comments:

- Review fact finding results and appeals for W-2 participants of the Agency over the last 12 months. If the Agency needed to make corrections to cases,

check CARES to determine if the corrections were made in a timely manner. Also review information about customer complaints regarding the agency and contacts with persons requesting follow up from the W-2 customer satisfaction survey to determine if there are particular customer concerns.

Comments:

- Place an anonymous phone call to the Agency to review information provided to potential applicants.

Comments:

- Review current agency organization charts and FTE report. Request current agency organizational chart prior to site visit.

Comments:

- Review EA and JAL reports (and select cases if appropriate) in advance.

Comments:

- Review Civil Rights and Limited English Proficiency Plans (Request information from Office of Civil Rights Compliance, or ask Agency to send plans in advance.)

Comments:

- Review Employee Bonus plan for private agencies (included in W-2 Plan).
Comments:

- Review report showing number of FoodShare assistance groups with minor children, no reported income and not on W-2. Is the number disproportionately high in relation to county size and W-2 caseload? If so, discuss with W-2 agency while on site. (This could be a reflection on Agency's outreach efforts and/or messages given during Income Maintenance application/review.)
Comments:

- Check with POS regarding any follow-up or self-assessment they have asked the agency to do. (Check in with agency on these items during on-site review.)
Comments:

II. Agency Performance

Review W-2 Agency performance on the primary and secondary performance standards for the W-2 program. Determine whether the agency exceeds, meets, needs improvement or fails the performance standard. Compare performance in the current year to the prior year to assess performance trends.

Performance Standard	Prior Year Performance	Current Year Performance	Performance Trend	Comments
Primary Standards				
Job Entry				
Earnings Stabilization				
Customer Satisfaction				
SSI/SSDI Receipt				
Educational Attainment				
Jobs Skills Training				
Secondary Standards				
Employment Retention				
Formal Assessment				
BST Completion				
Wage at Employment				
W-2 Initial Placement				
Caretaker Supplement				
Transition Plan for SSI				

III. On-site Review Modules

1. General Administration and Operations *(Discuss during initial meeting with designated management and staff – after providing an overview of the review and schedule for the day.)*

- What is the overall staffing model and the general W-2 flow in the Agency?
- Discuss Agency's Performance Standards results to date. For items that the Agency is doing well on, to what do they attribute their success? Are there any areas of concern that require action by the Agency?
- Are there any concerns with the Agency's Plan or Plan Modifications that require follow-up while on site? Are there any items where the description in the Plan does not match the way the Agency operates?
- Review subcontract files and any documentation of Agency's review of their subcontractors. Review reports/results from last subcontract annual review. Discuss how the Agency is conducting monitoring of subcontractor agencies on at least an annual basis. Have there been any significant issues discovered through these reviews? Are there any current concerns?
- Are there any concerns regarding the Agency's budget and expenditure reports that require discussion while on site?

- Ask to see the Agency's written cost allocation plan. Are there any concerns around exceptionally high or low administrative costs? If yes, discuss with program director/manager and financial manager how they are allocating and billing administrative costs.
- Review the Agency's written policies and procedures. Do they have all that are required by contract and DCF policy? Are the internal policies consistent with DCF policy?
- Review the Agency's compliance with W-2 training requirements. Have Agency staff completed the required training?
- Does the Agency have the required civil rights plan and/or letter of assurance documentation on file? Does Agency have the required Limited English Proficiency Plan? (Check with Office of Civil Rights Compliance, or request copy prior to visit.)
- Review recent fact findings and appeals with the Agency. How is the fact finding process managed by the agency? Were corrections to cases made in a timely manner?
- How is the Agency managing scanning of documentation into the Electronic Case File? Do they have any issues in this area, such as a backlog of documents waiting to be scanned?

2. Access and Outreach

- How does the agency get its referrals? Who are the primary referral sources?
- How do customers find out about W-2?
- *If the agency has few W-2 cases, ask about FoodShare cases with minor children and no reported income and how/if the Agency reaches out to these families.*
- Is there information about W-2 in the lobby? Is the information available in multiple languages, particularly if this is an area with large populations of individuals with primary languages other than English?
- Does the agency have bilingual staff or the availability of translator services? If yes, in what languages?
- Are there any apparent concerns with ADA compliance or access for persons with disabilities?
- Is the Agency conveniently located for persons living throughout the service area, including those with transportation barriers? Does the Agency have any creative best practices for reaching out to applicants/participants in remote areas (i.e., use of webcam/video conferencing)?
- What is the perception of the W-2 agency in the community? *(Note: Reviewer should speak to some community partners and advocacy agencies. If there is a Domestic Violence agency in the community, reviewer must include an interview with the DV agency.)*

3. Intake

- Observe customers in the lobby. How are they treated? Who interacts with them? What information is provided to them? (See Appendix B – Checklist for Lobby Observations.)
- Talk with some of the customers in the lobby. Ask them about their experience with the W-2 program.
- Observe one or more interviews with a Resource Specialist (or other staff person who performs this function). How does Agency staff interact with the customer? What information do they provide?
- What information is obtained from the customer during this process?
- Are there any agency-specific tools used during intake to gather customer information? (If so, ask for a copy.)
- Is the request for W-2 entered in CWW during the intake process? Is it also reflected in PIN-level comments on CMCC?
- What is the Agency's extension policy if they have a customer come in to apply for W-2 that has used their Federal 60 month clock?
- During the intake process, does the staff check to see if the customer is/was receiving TANF in other states? If no, why not? If yes, what is their process for doing this?

4. Assessment

- Does the agency routinely offer the Barrier Screening Tool (BST)?
- What is the BST completion rate for the agency? Are there any concerns about how the BST is presented to individuals during observations?
- What screening and assessment tools does the agency use?
- Are informal assessment activities documented in CARES?
- What is the quality of the assessment results obtained by the agency?
- How does staff determine the need for a formal assessment (i.e. self disclosure, staff observation)? Pay particular attention to use of formal assessments with W-2 T participants.
- Who provides formal assessments for the agency?
- Is confidential assessment information about participants appropriately stored to protect participant confidentiality?

5. Placement

- Based on case reviews and on-site observations, are appropriate decisions being made about placements based on assessment results?
- Are eligible participants placed in employment positions in a timely manner?
- Are placement decisions and assignment of activities in those placements consistent with policy?
- How does the agency utilize up-front job search activities for applicants prior to placement in an employment position? Is the use of up-front job search consistent with the W-2 Basic Assumptions?
- *Beginning in 2012:* How does the Agency determine which W-2 applicants should be placed in CMJ?
- Are CMC cases offered services during the time they are caring for their newborn child? How does the Agency handle the transition of CMC cases to employment positions?
- If the agency has At Risk Pregnancy (ARP) cases, is there the required documentation that shows the person qualifies for this benefit? If agency does not currently have any ARP cases, what documentation would they request if a customer stated they were an At Risk Pregnancy?

6. Ongoing Case Management

- How do FEPs determine what activities are appropriate for individuals?
- How are the BST and formal assessment results used to determine if participants have barriers to employment and participating in W-2 activities? Discuss the results from the case file review.
- Are barriers fully documented on the WPBD screen? Discuss the results from the desk review of the case records.
- How do FEPs develop individualized steps to address barriers?
- Does the Agency use the Accommodation form to document the accommodations needed by participants to perform job search and W-2 activities?
- What is the frequency of reviewing barriers with participants? How effective is the Agency in addressing barriers so participants can obtain employment?
- If the participant is the caretaker of a child or adult family member with special needs, how does the Agency address those needs in assigning activities for the participant?

- How do FEPs develop employability plans with participants? Are participants engaged in the employability plan process? Are assessment results and accommodations reflected in the employability plan?
- How are employability plans updated over time to reflect additional information about barriers or changes in participant circumstances?
- How do FEPs assist W-2 participants to obtain other benefits, such as Child Care, FoodShare, WIC, Badgercare/Medicaid, Energy Assistance, and Housing Assistance?
- *Beginning in 2012*: For participants placed in CMJ, how does the Agency support the participants in their job search activities? Is the status of CMJ participants reassessed at 30 day intervals?
- What is the typical frequency of face-to-face or telephone contact by FEPs with participants for ongoing case management?
 - CSJ participants
 - W-2 participants
 - CMF participants
 - Beginning in 2012* CMJ participants
- Does the Agency have adequate work sites for CSJ participants to gain work experience? If possible, visit a worksite. Complete Worksite Monitoring Tool (See Appendix C).

- Does the Agency have adequate activities such as workshops for CSJ and W-2 T participants? If possible, sit in on a workshop. Does the agency have adequate activities for W-2 T participants to prepare them to seek employment?
- For participants reaching the 60 month TANF limit, how does the Agency determine whether extensions should be granted? For any cases that have received extensions, how frequently is the case reviewed to determine whether the extension should be continued?

Beginning in 2012: Ask about extension of the 24 month limits.

- Discuss with the Agency any case management issues that were identified based on fact findings, appeals, customer complaints, the customer satisfaction survey performance standard, and follow up with participants from the customer satisfaction survey.
- Discuss long term W-2 T cases. What types of barriers do these individuals typically face? What is the Agency doing to move these cases forward? What types of activities are assigned? How frequently are these customers seen by their FEP? In particular, how is the agency serving W-2 T participants that are Caring for a Disabled Family Member?
- What is the agencies process for attendance verification? (Discuss any questions or concerns in this area from the case reviews.)

7. Employment

- How does the W-2 agency provide job development services to W-2 participants? If the Agency has job developers, how do those staff work with participants to match them with suitable employment?
- What is the agency doing to actively help persons find employment (vs. having participants find jobs on their own)?
- What is the overall labor market like in the area? What's the main industry in the area? Have there been downsizings or closures recently? Any new business start-ups?
- What types of jobs are W-2 participants generally getting in the community? How does the Agency identify job leads for these types of jobs?
- What career assessments is the agency using and how are they using these in regards to job matching?
- Does the Agency provide or refer participants to job skills training that will prepare participants for employment?
- Do the work experience sites available to participants provide opportunities to learn the skills needed to prepare participants for employment?

- How is the agency doing on the employment-related performance standards of job entry, wages and job retention? What specific strategies is the Agency using to improve employment outcomes for participants?
- What strategies does the Agency use to support job retention? How does the Agency support participants after they enter the workforce? Do they have regular, ongoing contact with employed participants? Any contact with the employers who hired participants?
- What types of employment outcomes does the Agency achieve for job entry (volume of employment, types of industry, etc.)?
- What is the average (typical) wage at job entry? How does the Agency's results for wages of employed W-2 participants compare with the statewide average and the local labor market? Do employers generally provide any benefits to employees?
- Are there any ongoing services or supports provided (directly by the Agency or via referral to other community services) to help individuals maintain employment and advance to more stable, higher paying positions?
- Is the agency using Trial Jobs? If so how?

8. Payments

- Discuss Agency policy and procedures for use of partial CSJ payments. How is it determined which participants will receive partial payments? How frequently are partial payments updated to reflect changes in participant circumstances?
- Discuss Agency practice with CMC payments. Are CMC payments ended in a timely manner? When participants have new children, are they switched to CMC status in a timely manner?
- Discuss Agency policy and procedure for issuance of Emergency Assistance payments. How is documentation in EATS managed? Discuss any findings from comparison of CORE and EATS reporting.
- Discuss Agency policy and procedure for issuance of Emergency “Upfront” W-2 Payments. Under what circumstances are Up-front payments made? How is the amount of the Up-front payment determined?
- Discuss Agency policy and procedures for returned W-2 benefit checks. Are returned checks documented in CARES and the actual check returned in a timely manner?
- Discuss Agency policy and procedure for use of auxiliary payments? Under what circumstances are auxiliary payments made?

- Discuss Agency policy and procedures for Job Access Loans. Under what circumstances are JALs made available to eligible persons? Is the purpose of the JAL consistent with W-2 policy? Do JAL recipients have or are starting employment so they can repay the JAL?
- Discuss Agency policy and procedures for supportive service payments made on behalf of W-2 participants. What types of expenses will the Agency pay and what is the limit on supportive service payments? If supportive service payments are made to specific vendors on a regular basis, how are the vendors selected and does the Agency monitor the vendors to confirm that participants receive the supportive service in a timely and effective manner?
- Discuss Agency internal fiscal controls to confirm which staff are authorized to make payments. Does the Agency have an internal quality assurance process to assure that all payments are appropriate?

Note: Ask for a copy of all written policies the agency has regarding payments. The fiscal policies should be reviewed to verify the Agency is in compliance with W-2 fiscal requirements. If agencies do not have written policies for a particular payment, the review report can include recommendations that the Agency develop written policies and implement a quality assurance process.

9. Program Integrity

- Discuss with the Agency how W-2 overpayment/fraud prevention, identification and benefit recovery activities are handled. Review the W-2 fraud plan with Agency staff. Ask about any overpayment and fraud cases the Agency is currently involved with.
- Discuss data matches and other processes to prevent and identify overpayments. What staff are responsible for monitoring data matches?
- Discuss fraud investigation. What staff are responsible for the investigation function? How are W-2 fraud cases coordinated with Income Maintenance fraud investigations?
- For overpayments, does the agency actively pursue recovery of benefits? Are overpayment cases certified to DCF for collection?

10. Support Services

- Discuss with the Agency how supportive services are provided to W-2 participants. What services are available to help people perform job search and participate in W-2 activities?
- Are supportive services issued at an appropriate level and for uses consistent with W-2 policy?
- Are child care and transportation services routinely offered to W-2 participants?
- Does the Agency provide clothing or supplies necessary for persons to participate in activities and worksites?
- What is the Agency practice regarding participant vehicles? Under what circumstances does the Agency pay for vehicle repairs?
- Does the Agency have connections with community resources to assist participants with clothing, household needs and other supports?

11. SSI Advocacy

- How does the Agency determine when it is appropriate to place someone on the SSI track?
- What does the Agency do to assist an individual in obtaining SSI? Does the Agency have staff that perform SSI advocacy to help with SSI applications and follow up with the Social Security Administration?
- How often does the Agency re-assess appropriateness of individuals in this track, particularly if SSI has been denied, or if there is a change in the individual's circumstances?
- What W-2 activities are assigned to persons on the SSI track while they are waiting for SSI decision?
- Once persons are determined eligible for SSI, how does the Agency develop a transition plan with the participant and assist the participant to obtain the SSI CareTaker Supplement?

12. Education and Jobs Skills Training

- How does the Agency identify needs for Adult Basic Education and literacy skills development?
- Once an educational need is identified, how does the Agency address the educational need as part of the employability plan?
- Are the assigned activities and hours of educational activities consistent with W-2 policy?
- Are educational activities assigned to participants who lack a high school degree or GED to assist them to obtain a HSED/GED?
- How does the Agency identify needs for jobs skills training?
- What types of job skills training does the Agency make available to W-2 participants?
- Describe any collaborative activities with technical colleges or other education and training providers in the area.
- In regards to Technical College/post secondary activities, how does the agency follow up to verify of the student meets the following requirements:
 - Maintains full time status in the college program,
 - Maintains a grade point average of at least 2.0,
 - Participates in other assigned work activities for 25 hours per week?

13. Case Closures, Sanctions & Extensions

- Based on review of the past three months' Case Closure Reports, discuss the common reasons or trends seen for W-2 cases being closed. Discuss any concerns about case closures that may have been raised by review of this report, case reviews, and/or complaints.
- What are the Agency's policies and procedures for deciding to close a case? Is the supervisor or another staff member consulted prior to closure?
- Based on review of the last three months disenrollment list (showing individuals closed for eligibility but needing to be disenrolled on the Work Programs side), discuss actions needed to clean up outstanding disenrollments.
- How frequently does the Agency's impose sanctions? What are the common reasons for sanctions? Discuss the Agency's process for deciding to impose a sanction. Discuss any concerns with regards to sanctions that may have been raised by case reviews, complaints, etc.
- Does the Agency have many cases approaching the 60 month federal TANF time limit or 24 month limits for CSJ and W-2 T placements? How frequently has the Agency granted extensions? Are multiple extensions being granted on the same cases? If so, why? Who decides whether or not to grant an extension? What is the process? What criteria are considered?

Appendix A:

W-2 Reports Monitored by BRO and MOS Staff

Fiscal

- 1) Job Access Loan spending (weekly)
- 2) Emergency Assistance reporting (monthly)
CORe information from Bureau of Fiscal Services is compared against cases in EATS.
- 3) Returned Check Report (quarterly)
Web1 Report #16 in the W-2 Payments folder shows number of returned checks by agencies, as well as disposition reason and status. Spot checking of cases in CARES is done as warranted. If the agency has a disproportionately high or low number of returned checks, or if discrepancies are identified through case reviews or complaints, additional follow-up will occur.

Program Compliance & Quality

- 1) CMC Summary & Detail; CMC Ended During the Month Report (monthly)
Reports shows CMC cases including cases where the family has new child and need to be changed to CNC, cases approaching the CMC limit (70-84 days) and cases with CMC over the limit (>84 days).
- 2) Assessments (monthly)
 - PS0609 Report#50 - Formal Assessment Due
 - PS0609 Report #51 - Informal Assessment Due.
- 3) Extensions (monthly)
PS45 Report #54 showing cases needing 60 month extension requests.
- 4) Participant activities (monthly)
 - 740A - Placement and Activity Detail Report. Monitored for expired Employability Plans, number of assigned hours, and length of W-2 employment placements.
 - 740TANF - Shows whether cases are meeting Federal TANF requirements and other information on caseload activity.
- 5) PS 2010-2012 Performance Standards Reports (monthly)

- 6) BST Overdue Report (monthly)
Each region uses data from the Barrier Screening Tool database to monitor timely documentation of BSTs.
- 7) WebI Fact Finding Reports 12, 14, 16, and 25 (prior to comprehensive on-site review, monthly for any agencies where concerns are identified).
- 8) Case Closure Reasons and Disenrollment Lists (prior to comprehensive on-site review, monthly for any agencies where concerns are identified).
- 9) Current Federal Clock/Payment Discrepancy Report (WebI Payment Folder, Report #15). POS reviews this report for 9 largest agencies in Balance of State. BRO/MOS review for remainder of agencies (prior to comprehensive review, monthly for any agencies where concerns are identified).



Appendix B

Lobby Checklist

Check to see that the agency has each of the following items available/posted in the lobby:

- Equal Rights and Opportunities Poster

- Domestic Violence Poster (all 3 languages)

- BST Poster (all 3 languages)

- Pamphlets or posters on W-2, Food Share, MA, Child Support, Child Care

- Information on other agency/community resources such as: Job Access Loans, Transportation, Emergency Assistance, Hosing, WHEAP, Earned Income Tax Credit, WIA, and WIC

- Job Information
 - Current job listings/leads
 - Availability of computers for job search
 - Other job information (Specify: _____)

- Training Opportunities



Appendix C
Work-Site Monitoring (Work Skills)

Regional Office:	RO Staff:
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W-2 Agency	W-2 Agency Contact Person	
	Position	
Site Name and Location		
Industry	# of slots available	# of slots filled

Discussion with W-2 agency contact Date:

*** Ask for a copy of worksite agreement.***

Does the W-2 agency pay for this worksite	If yes, what is the cost?	
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Explain how this worksite was developed.	
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What are the goals?	
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Has the W-2 agency determined jobs in this industry?	Does LLM data support this?	
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Describe the activities that the participants perform at this work site.	
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Does the W-2 agency review this site on a regular basis? How often?	How often?	
*Ask the agency to provide a copy of a completed review form.		
Have participants with needed accommodations been referred to this site?	How have they been accommodated	
Have participants who have completed work experience in this industry subsequently found employment using skills acquired at this site?		
<u>Discussion with the Site Manager</u>	<u>Date:</u> _____	
What are the jobs duties assigned at this site?	Is there variety?	
	Is training Offered? Type? Frequency? Who trains?	
What kinds of accommodations have been provided?		
Who identified the need, W-2 agency, participant, or worksite?		
Does this site offer an opportunity to accept increasing levels of complexity and responsibility? If yes, explain		
With what frequency do the site manager and the W-2 agency discuss the participant's progress? o How is this accomplished, e.g. by phone, in person, via mail?		
How are problems dealt with?		
How has site manager's experience been with the arrangement?		
In general have participants been appropriate for placement at this site? Discuss your experience.		

Have work experience participants been placed into Trial Jobs at this site?		
Have participants have been hired into unsubsidized employment at this site? (Approximate #) How long did they remain employed?	What kind of employee benefits does your business provide?	
<ul style="list-style-type: none"> How is attendance monitored? 		
How many participants have been hired into unsubsidized employment at this site? Does this employer pay benefits? How long did they remain employed?		

WORK SITE EVALUATION

Is the work site providing marketable skills to the participant?	What do the LLM statistics say about employment opportunities in this industry in this area of the state?	
What is <u>not</u> working with this worksite experience that needs to be examined with the agency?	What is working well at this site? Success Stories?	
Is this work site a good fit for W-2 participants?		

Re-contacted agency?

Date:

Results: