

From: [DCF BWF Work Programs Help Desk](#)
To: [DCF DL DFES BWF W-2 Agency Directors](#); [DCF DL DFES BWF W-2 Agency CARES Coordinators](#); [DCF DL DFES BWF TJ TMJ](#)
Cc: [DCF DL DFES BWF W-2 REGIONAL STAFF](#); [DCF DL DFES PTT W-2 Staff](#); [DCF DL DFES BWF Supervisors](#)
Subject: COVID-19 Policy Adjustments
Date: Tuesday, March 31, 2020 4:20:20 PM
Attachments: [Consolidated Policies Fourth Round.docx](#)

Good Afternoon.

Attached is the most recent Work Program Policy and Automation Adjustments from BWF. Please be sure to share this information with your staff and alter case management procedures accordingly. This email and the attached document will be posted to the BWF Work Programs Help Desk Home Page located here: <https://dcf.wisconsin.gov/w2/partners/toolbox/helpdesk> and can be found in the Common Requests section under **COVID-19 Information**.

If you have any questions regarding the updated policies, please contact the W-2 Policy Mailbox at DCFw2PolicyQuestions@wisconsin.gov or the Help Desk at BWFworkprogramsHD@wisconsin.gov as appropriate. For contract questions, please contact Linda Richardson at Linda1.Richardson@wisconsin.gov. Your regional staff are also available for questions.

Thank you all for all your hard work serving the children and families of Wisconsin.

Jes Moss

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COVID-19 UPDATES

COVID-19 continues to impact many families throughout Wisconsin, including those served by the Department of Children and Families through our programs. These impacts come in the form of illness, missed work caused by illness and economic disruptions, lack of childcare due to center closures, K-12 school and early learning closures, and reduced activity opportunities due to worksite closures. During this uncertain and challenging time, we view the COVID-19 pandemic as an event outside of the control of our participants and therefore access to our programs is critical to the COVID-19 emergency response. For that reason, BWF is making temporary adjustments listed below to encourage social distancing and mitigate the spread of the virus while supporting those we serve. Agencies must inform staff of adjustments and alter case management procedures accordingly.

| CATEGORY | TOPIC | W-2 AND RELATED PROGRAMS ADJUSTMENT | PROGRAMS | | | ANNOUNCEMENT DATE | EXPIRATION DATE |
|---|-------------------------------|---|----------|-----|-----|----------------------|--------------------|
| | | | W-2 | JAL | RCA | | |
| Policy Adjustments without automation changes | Application & Case Processing | <p>Requesting Verification from Applicants and Participants</p> <p>Due to COVID-19 and many businesses and external entities closing or operating under reduced capacity, individuals may be unable to furnish needed verification documents and W-2 agency staff may not have the ability to assist. While BWF is not yet making changes to current verification requirements, this is a reminder that there is significant flexibility currently in policy to accommodate challenges likely to be experienced during the public health emergency. FEPs are encouraged to exercise this discretion to ensure individuals can access our program and resources without unnecessary delay.</p> <p>As a reminder, applicant and participants have seven working days to provide needed verification. The verification due date may be extended up to 30 days if extenuating circumstances exist and the agency is required to assist individuals unable to produce verification. If the agency is unable to assist, the agency must use the available information to process the case. The FEP must not deny an application or close a case based on the information that could not be obtained.</p> <p>BWF, along with its partners in the Division of Early Care and Education and Department of Health Services, is exploring</p> | X | X | X | 3/23/2020 | |

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| | | additional verification changes. Future changes will be communicated in a similar manner. | | | | | |
| Policy Adjustments without automation changes | Application & Case Processing | <p>Suspension of In-Person Signature and Meeting Requirements</p> <p>Existing policy requires in-person signatures and meetings at application and various points throughout ongoing case management.</p> <p>BWF is suspending the requirement for in-person signatures and meetings. W-2 agencies may conduct all appointments, typically held in-person, by telephone as necessary to reduce risk of COVID-19 exposure. W-2 agencies are to use the Contact Center Anywhere (CCA) software currently in use for CMF, CMF+, and CMU W-2 Eligibility Reviews to collect all required signatures from W-2 applicants and participants.</p> <p>CWW will provide an option for collecting a telephonic signature for eligibility reviews for all placement types. It will not provide the option for collecting a telephonic signature for any other type of meeting, however. Therefore, for telephonic signatures for anything other than an eligibility review, FEPs will have to read whatever document is being telephonically signed, e.g., W-2 application, W-2 Participation Agreement, Employability Plan, etc., in order to record the agreement being made between the FEP and the participant, the FEP will need to read the language that is in the telephonic signature display in CCA. CCA will then provide the FEP with the interaction id number that the FEP should record in case comments.</p> <p>Information on how to navigate the CCA software is available on the Partner Training Team (PTT) Learning Center in the Contact Center Anywhere Reference Guide for W-2 desk aid. Additional information on use of CCA can be found in Operations Memo 18-09: Telephonic Signatures for CMF, CMF+, and CMU W-2 Eligibility Reviews. Information on requesting CCA is included in this</p> | X | X | X | 3/23/2020 | |

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| | | <p>Operations Memo. BWF will also be setting up CCA access for supervisors to oversee work remotely. Information is forthcoming.</p> <p>Update 3/31/20: For refugees and other ORR-eligible populations applying for W-2 or RCA, FEPs may accept Authorized Representative forms from resettlement agency staff without applicant/participant signatures. FEPs may then work with those authorized representatives from resettlement agencies to complete any necessary forms by the adjusted means outlined in other areas of this document.</p> | | | | | |
| Policy Adjustments with automation changes | Nonfinancial Eligibility | <p>JAL Eligibility</p> <p>If a customer applies for a JAL but is then laid off due to COVID-19 at some point during the JAL application process with no known time to return to work, would they remain eligible for a JAL?</p> <p>The agency needs to verify that the applicant is currently employed, regardless of the number of hours, including up to a full lay off. The applicant still needs to demonstrate their ability to repay the loan to be eligible. The agency is reminded that applicants are able to renegotiate their repayment terms to extend out to 24 months instead of 12 months.</p> | | X | | 3/25/2020 | |
| Policy Adjustments without automation changes | Assessment | <p>Career and Educational Assessment 30-day Timeframe</p> <p>Currently, when completion of a standardized educational needs assessment tool is necessary to determine or confirm the applicant or participant’s current educational levels, the tool must be scheduled and documented in CARES within 30 days of placement. Career assessment must be offered to all applicants and assigned as an activity on the initial EP. If an applicant is new to W-2 or is re-applying and does not have a career assessment documented, a career assessment must be scheduled within 30 days of application and completed within 30 days of placement.</p> | X | | X | 3/25/20 | |

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| | | <p>BWF is suspending the 30-day timeframe for scheduling and documenting career assessments and standardized educational needs assessment tools in CARES to support social distancing efforts and reduce risk of COVID-19 exposure.</p> <p>This timeframe suspension includes the RCA requirement to work with recipients to manually develop individual Employability Plans.</p> | | | | | |
| Policy Adjustments without automation changes | Assessment | <p>Formal Assessment 30-day Requirement</p> <p>Currently, participants offered or referred for formal assessment must have a formal assessment activity scheduled and documented in CARES within 30 calendar days of the referral date. 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. During the COVID-19 public health emergency, challenges and delays in scheduling and completing formal assessments are anticipated.</p> <p>BWF is suspending the required 30-day timeframe for scheduling and documenting formal assessments to accommodate anticipated delays in scheduling and completing formal assessments due to COVID-19. Because formal assessments are necessary to ensure full participation and reasonable accommodations, the formal assessment is to be scheduled and completed as soon as it is safe to do so and the appropriate qualified assessor is accepting appointments.</p> | X | | | 3/25/20 | |
| Policy Adjustments with automation changes | Activity Assignment | <p>New Social Distancing Activity Code</p> <p>A new Activity Code has been created to report hours previously assigned to activities affected by the COVID-19 outbreak and community sequester. Use CX – Social Distancing Activities for individuals who are unable to participate in activities that entail face-to-face contact or group activity due to the COVID-19</p> | X | | X | 3/23/2020 | |

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| | | <p>Pandemic. The activity code will be available in CARES on Tuesday, March 24, 2020.</p> <p>Agencies must evaluate activity assignments, determine which activities cannot be done in compliance with COVID-19 Social Distancing requirements, close out those activities using component Completion Code B - Unsuccessfully Completed/Interrupted, and report the aggregate hours using the CX Activity Code. The social distancing activity can be closed using component Completion Code A - Successfully Completed, when a new EP is created after the public health emergency is over.</p> <p>Agencies are encouraged to continue activities that could be done from home, for example: CD – Caring for Disabled Child CE – Career Planning & Counseling CF – Caring for Other Family Member LF – Life Skills MO – Job Readiness/Motivation MP – Ongoing Medical/Personal Care PA – Parenting Skills PD – Personal Development PR – Physical Rehabilitation</p> <p>The following forms are required for CD, CF, MP, and PR. These forms will be considered valid through the duration of the public health emergency.</p> <ol style="list-style-type: none"> 1. Need to Care for Disabled Family Member DCF-F-DWSP10786 2. Medical Examination & Capacity DCF-F-DWSP2012 3. Mental Health Report DCF-F-126 | | | | | |
| Policy Adjustments without | Activity Assignment | Suggestions for Assigning W-2 Activities | X | | X | 3/27/2020 | |

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| automation changes | | For more suggestions for assigning W-2 activities, please see the March 27, 2020 – COVID-19 Suggestions for W-2 Activity Assignment email from the BWF Work Programs Help Desk. | | | | | |
| Policy Adjustments without automation changes | Activity Assignment | <p>Documentation/Verification/Supervision</p> <p>Documentation, Verification, and Supervision of activities that count toward the Work Participation Rate remains a requirement to ensure the integrity of our federal reporting data. However, the suspension of face-to-face interactions applies here as well. W-2 agencies must explore online and telephonic options for documenting, verifying, and supervising activities.</p> <p>Because BWF recognizes that communication with participants and external providers is going to be difficult during COVID-19, the W-2 agencies also may use new the new good cause code if unable to make necessary contact or experiencing any other difficulties verifying participation. See above for more information on the CX good cause reason code.</p> | X | | X | 3/31/20 | |
| Policy Adjustments without automation changes | Employability Planning | <p>Employability Plan Review</p> <p>The previously announced policy adjustment suspending the requirement for in-person signatures and meetings applies to the EP review and supervision of activities. See above for additional information.</p> <p>Under existing policy, the FEP must first discuss all potential EP change(s) with the participant. Because of the ability to conduct the EP review via telephone during the public health emergency, consultation with the participant continues to be an expectation for EP updates. Current policy also allows the EP to be written for no more than 6 duration, and FEPs are encouraged to utilize this</p> | X | | X | 3/31/20 | |

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| | | flexibility during the public health emergency, particularly if the FEP observes potential barriers to phone or internet access. | | | | | |
| Policy Adjustments without automation changes | Time Limits | <p>State 60-Month Time Limit Extension Criteria</p> <p>Current state 60-month lifetime limit extension criteria accommodate many challenges that applicants and participants may have experienced prior to the COVID-19 pandemic; however, it is important to highlight that W-2 agencies may interpret the “family problems” extension criterion to include the unique challenges that applicants and participants may be experiencing during the COVID-19 pandemic. Examples of family problems that may be prevalent during the public health emergency include the need to remain at home to provide childcare due to school/day care closures or adhere to social distancing practices. The “family problems” extension reason may also be used in situations where an individual is unable to obtain a valid formal assessment for criteria 2, 3, and 4 due to the COVID-19 outbreak and community sequester.</p> <p>In making extension approval vs. denial decisions, W-2 agencies are encouraged to review and interpret time limit extension requests favorably for the applicant or participant due to the impact of the COVID-19 pandemic on low-income parents and their families.</p> | X | | | 3/25/20 | |
| Policy Adjustments with automation changes | Eligibility Reviews | <p>Three-month Extension for Eligibility Reviews</p> <p>W-2 agencies are required to conduct a W-2 eligibility review at least every six (6) months. The due dates for W-2 eligibility reviews originally scheduled for months March through August have been extended for a period of 3 months.</p> <p>March Eligibility Reviews: As noted above, March eligibility review due dates were extended to June 30, 2020. However, when the date was changed in CWW, there were some cases that were already in “Pending” status. BWF is asking that the W-2 agencies</p> | X | | | 3/23/2020 | |

| | | <p>review these cases to ensure that they are not incorrectly closed for failing to provide verification related to a review, since reviews have been extended. A list of pending cases by agency has been attached to this email.</p> <p>April Eligibility Reviews: BWF is issuing a one-time letter the week of March 23, 2020, notifying 778 W-2 participants who have received a 45-day notice that they had eligibility reviews in April that their review date has been extended three months. BWF will work with Wisconsin’s Department of Health Services determine future communications for May and June.</p> <p>Update 3/25/2020: The W-2 eligibility due review dates for April through August were changed in CWW and ACCESS. The following language was added to case comments for the relevant cases:</p> <table border="1"> <thead> <tr> <th>From Date</th> <th>To Date</th> <th>Case Comment</th> </tr> </thead> <tbody> <tr> <td>4/30/20</td> <td>7/31/20</td> <td>3/23/20 - W-2 eligibility review period ending 4/30/20 systematically extended by 3 months due to COVID-19 emergency.</td> </tr> <tr> <td>5/31/20</td> <td>8/31/20</td> <td>3/23/20 - W-2 eligibility review period ending 5/31/20 systematically extended by 3 months due to COVID-19 emergency.</td> </tr> <tr> <td>6/30/20</td> <td>9/30/20</td> <td>3/23/20 - W-2 eligibility review period ending 6/30/20 systematically extended by 3 months due to COVID-19 emergency.</td> </tr> <tr> <td>7/31/20</td> <td>10/31/20</td> <td>3/23/20 - W-2 eligibility review period ending 7/31/20 systematically extended by 3 months due to COVID-19 emergency.</td> </tr> <tr> <td>8/31/20</td> <td>11/30/20</td> <td>3/23/20 - W-2 eligibility review period ending 8/31/20 systematically extended by 3 months due to COVID-19 emergency.</td> </tr> </tbody> </table> | From Date | To Date | Case Comment | 4/30/20 | 7/31/20 | 3/23/20 - W-2 eligibility review period ending 4/30/20 systematically extended by 3 months due to COVID-19 emergency. | 5/31/20 | 8/31/20 | 3/23/20 - W-2 eligibility review period ending 5/31/20 systematically extended by 3 months due to COVID-19 emergency. | 6/30/20 | 9/30/20 | 3/23/20 - W-2 eligibility review period ending 6/30/20 systematically extended by 3 months due to COVID-19 emergency. | 7/31/20 | 10/31/20 | 3/23/20 - W-2 eligibility review period ending 7/31/20 systematically extended by 3 months due to COVID-19 emergency. | 8/31/20 | 11/30/20 | 3/23/20 - W-2 eligibility review period ending 8/31/20 systematically extended by 3 months due to COVID-19 emergency. | | | | | |
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| 8/31/20 | 11/30/20 | 3/23/20 - W-2 eligibility review period ending 8/31/20 systematically extended by 3 months due to COVID-19 emergency. | | | | | | | | | | | | | | | | | | | | | | | |
| Policy Adjustments without | Payments | Updating Agency Addresses for W-2 and RCA Payment Checks | X | X | X | 3/25/2020 | | | | | | | | | | | | | | | | | | | |

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| automation changes | | <p>Below is guidance on updating agency addresses for W-2 payment checks when offices have closed to both the public and staff.</p> <p><u>Returned checks:</u> The agency director (or whomever is listed as authorized at the post office) should create a forwarding address or a hold for pick-up at USPS and have returned checks temporarily sent to an alternative location. Agencies will then need to develop a plan for distribution of checks to participants, e.g., have limited hours to distribute checks.</p> <p><u>Checks mailed from the Department of Children and Families mailroom, e.g., JAL checks, auxiliaries over \$1000, etc.:</u> If an agency does not have access to its primary location, it must provide an alternative agency address for the mailroom to use. To make a permanent or long-term change to their primary address, agencies must notify the DHSCARESCallCenter@dhs.wisconsin.gov, which will update the address in CWW. Once updated the new address will appear as the return address on W-2 checks. Until that change takes effect, agencies must take action as noted above for checks that are in transit to a closed location.</p> | | | | | |
| Policy Adjustments with automation changes | Sanctions | <p>New Good Cause Reason Code</p> <p>A Good Cause Reason Code: CX has been created for W-2 activities that cannot be completed due to the COVID-19 outbreak and community sequester. Individuals who are unable to participate in assigned activities due to the public health emergency must be provided Good Cause for non-participation. The CX reason code is now available in CARES.</p> | X | | X | 3/23/2020 | |
| Policy Adjustments without automation changes | Sanctions | <p>Rectifying 20% Payment Reduction Policy</p> <p>Individuals who have received a 20% payment reduction notice have 7 working days to provide written verification of good cause,</p> | X | | | 3/23/2020 | |

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| | | <p>if necessary. Under existing policy, the verification due date cannot be extended from 7 working days to 30 days.</p> <p>Due to COVID-19, FEPs should extend the due date on written verification for good cause to 30 days or more for participants who have received a 20% reduction letter.</p> <p>Due to the COVID-19 Pandemic, it is highly likely that participants will not be able to obtain written verification of good cause within the 7 working day timeframe and attempts to do so could put them at risk of contracting or further spreading the virus.</p> | | | | | |
| Policy Adjustments without automation changes | Case Closure | <p>Case Closure for Loss of Contact</p> <p>Under existing policy, FEPs are required to close a case for noncooperation if they have not been able to contact a participant for 30 days or more after repeated attempts.</p> <p>Due to COVID-19, FEPs may keep cases open even if they have been unable to contact the participant for 30 days or more.</p> <p>Due to the COVID-19 Pandemic, it is very possible that participants may be in quarantine or in the hospital for long periods of time, and therefore unable to have any in-person contact with the FEP at the agency, a worksite, or even their own home. Additionally, if participants lose their jobs due to COVID-19 related closures and are unable to pay a phone or internet bill as a result, there would be no way to contact them.</p> | X | | | 3/23/2020 | |
| Policy Adjustments without automation changes | Learnfare | <p>Adjustment of School Enrollment and Attendance Requirements</p> <p>W-2 policy requires children in W-2 Groups to be enrolled in and attending school. Due to the COVID-19 pandemic, schools in Wisconsin are closed. Learnfare school enrollment and attendance requirements are adjusted as follows:</p> | X | | | 3/25/2020 | |

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| | | <p>For new applicants: W-2 agencies should not subject new W-2 applicants to Learnfare requirements. Children would be exempt from the school enrollment and attendance requirement due to circumstances beyond their control that make them unable to be enrolled in and attend school. Use Learnfare Status Code WEX – Excused from School on the School Enrollment page in CWW.</p> <p>For current W-2 participants with children subject to Learnfare Case Management requirements: Children who are currently mandatory for Learnfare Case Management will remain mandatory until the next review.</p> <p>W-2 agencies must evaluate Learnfare Case Management activity assignments, determine which activities cannot be done in compliance with COVID-19 Social Distancing requirements, close out those activities using component Completion Code B - Unsuccessfully Completed/Interrupted, and report the aggregate hours using the CX Social Distancing Activity Code. See further instructions on Activity Assignment above.</p> <p>Individuals who were unable to participate in assigned Learnfare Case Management activities due to COVID must be provided Good Cause for nonparticipation using the Good Cause Reason Code CX.</p> | | | | | |
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| CATEGORY | TOPIC | EMERGENCY ASSISTANCE ADJUSTMENT | ANNOUNCEMENT DATE | EXPIRATION DATE |
|---|-------------------------------|--|-------------------|-----------------|
| Policy Adjustments without automation changes | Application & Case Processing | <p>Suspension of In-Person Signature and Meeting Requirements</p> <p>Under existing policy, the EA application form must be completed and signed in the presence of a W-2 agency staff person, and the worker must have at least one face-to-face contact with the EA applicant to go through the application and assurances on the application prior to determining eligibility.</p> | 3/23/20 | |

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| | | Due to COVID-19, W-2 agencies may conduct all appointments, typically held in-person, by telephone as necessary to reduce risk of COVID-19 exposure. W-2 agencies are to use the Contact Center Anywhere (CCA) software currently in use for CMF, CMF+, and CMU W-2 Eligibility Reviews to collect all required signatures from EA applicants. See similar guidance above. | | |
| Policy Adjustments without automation changes | Application & Case Processing | <p>Emergency Assistance Applications Fillable Form Now Available</p> <p>Due to COVID-19 and the reduction of in-person applications, part one of the Emergency Assistance application (Form 2010) has been formatted to a fillable Microsoft Word document. There are no policy updates associated with this change.</p> <p>The Spanish version of Form 2010 has also been formatted to a fillable Microsoft Word document.</p> | 3/27/20 | |
| Policy Adjustments without automation changes | Financial Eligibility | <p>Prospective Income Determination</p> <p>Under existing policy, the combined total earned and unearned income of the EA Group must be at or below 115% of the Federal Poverty Level (FPL) in the 30 days prior to and including the EA Application date.</p> <p>Due to COVID-19, when determining the combined total earned and unearned income of the EA Group to be at or below 115% of the FPL, workers may use either:</p> <ol style="list-style-type: none"> 1. The prior 30 days prior to and including the EA Application date; or 2. Prospective budgeting using a best estimate of what income will be received in the next 30 days. | 3/23/20 | |