

LIVING INDEPENDENTLY THROUGH FINANCIAL EMPOWERMENT (LIFE)

PROGRAM AND POLICY GUIDE

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01 PROGRAM OVERVIEW

1.1 LIVING INDEPENDENTLY THROUGH FINANCIAL EMPOWERMENT PROGRAM OVERVIEW

The American Rescue Plan Act of 2021 established a new Pandemic Emergency Assistance Fund (PEAF) to assist needy families impacted by the Coronavirus Disease 2019 (COVID-19) pandemic. With this funding, The State of Wisconsin's Department of Children and Families created the Living Independently through Financial Empowerment (LIFE) program to assist families experiencing crises resulting from a domestic violence situation that has been compounded by the COVID-19 pandemic.

The LIFE program is designed to increase economic mobility for survivors of domestic violence by providing a financial safety net to ensure their basic needs can be partially met as they create independent, violence-free lives for themselves and their children.

The Wisconsin Works (W-2) agencies administer the LIFE program in their geographical areas. Contact and location information for each W-2 agency that administers the LIFE program is available on the W-2 Agency Locator website.

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1.2 APPLICATION PROCESS

Individuals apply for the LIFE program by working with a W-2 agency employee to complete a Request for Assistance (RFA) in the Wisconsin Work Programs (WWP) system during a meeting with a W-2 agency worker. The W-2 agency must provide an opportunity to complete an RFA to all persons who request the LIFE program. Individuals can request the LIFE program by contacting the W-2 agency directly, or by working with a local Domestic Violence (DV) advocacy agency, Tribe, or other organization who refers the individual to their local W-2 agency. The LIFE program is not available to applicants in ACCESS, the client-facing web portal.

The meeting with the W-2 agency worker can be completed:

- 1. In-person;
- 2. Over video call: or
- 3. Over a phone call.

Individuals who do not have an open W-2 case can apply at any W-2 agency. However, applicants who are currently open and enrolled in W-2 must work with the W-2 agency where they are already receiving W-2 services.

W-2 agencies must follow the Americans with Disabilities Act (ADA) and offer and provide reasonable accommodations to applicants who disclose a disability. Examples of reasonable accommodations may include reading materials aloud, providing materials in different formats, or going to the DV Advocacy Agency or other mutually agreeable location to complete the LIFE application in person. All W-2 agency workers must be familiar with current civil rights standards for service delivery and resources available to ensure the LIFE program is accessible

to all applicants. (See <u>W-2 Manual Appendix, W-2 Agency Civil Rights Obligations</u>) Examples of accommodations are listed in the W-2 Manual 1.3.3.

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1.3 Processing Requests for Assistance (RFAs)

When an individual contacts the W-2 agency requesting to apply for the LIFE program or the W-2 agency receives a referral from a local DV agency, Tribe, or other organization, the W-2 agency must:

- 1. Contact the individual within one working day to schedule a meeting to process the RFA; and
- 2. Meet with the individual to process the RFA within five working days.

Agencies must manually track any attempts to contact an individual prior to creating an RFA in WWP. Any documentation must be stored confidentially.

W-2 agencies are encouraged to contact applicants and process RFAs as quickly as possible. For example, processing the RFA at the time of first contact if the agency and the applicant are both available.

RFAs must be completed within 30 calendar days of the application date, which is the day an RFA is created and initially saved in WWP. Day one is the calendar day following the application date. Agencies have 30 calendar days to complete the RFA for cases where the applicant needs more time to obtain documents. However, agencies are encouraged to complete the RFA as quickly as possible to expedite assisting an applicant in crisis.

A completed LIFE RFA includes:

- 1. An eligibility determination. To determine eligibility, the W-2 agency must:
 - a. Have at least one meeting with the applicant (see 1.2);
 - b. Determine nonfinancial eligibility (see Chapter 2);
 - c. Determine financial eligibility (see Chapter 3); and
 - d. Request and complete all necessary information and verification (see Chapter 4).
- 2. An RFA signature (see 4.4):
- 3. Issuing a notice of eligibility (see 1.4); and
- 4. Providing appropriate referrals (see 1.5).

If the RFA is not completed within 30 calendar days, WWP auto-denies the RFA and the W-2 agency must send a manual <u>LIFE Notice of Eligibility form (5480)</u>. (See <u>1.4</u>)

EXAMPLE: If a LIFE RFA has an application date of October 24, the system auto-denies the RFA at close of business on November 23.

1.4 ISSUING NOTICES OF ELIGIBILITY

Once eligibility has been determined, the W-2 agency must issue a notice of decision regarding eligibility within five working days, including situations when applicants choose to withdraw their application. Day one is the first working day after the application date.

 For approved RFAs: WWP automatically generates and sends an Eligibility Notice of Approval at the close of business the day an individual is enrolled in the LIFE program*.

Notices are sent to the applicant's address from client registration in WWP, unless an alternate mailing address is added on the RFA. The alternate mailing address field in WWP can be updated at any time.

A Spanish version of the letter is sent when the home language is identified as Spanish on the **Client Registration** page.

- For denied or withdrawn RFAs: W-2 agency workers must send a manual notice using the <u>LIFE Notice of Eligibility form (5480)</u> within five working days of determining an individual is not eligible for the LIFE program (or the applicant chooses to withdraw). Each notice must include the following:
 - The W-2 agency contact information;
 - Date of eligibility determination;
 - · Denial reason; and
 - Any additional comments as necessary.

A <u>Spanish version</u> of *Form 5480* is available when the home language is identified as Spanish on the **Client Registration** page.

W-2 agency workers must discuss with the applicant the most appropriate and safest mailing address to use so the applicant can receive checks and notices.

*In the case of multiple enrollments, an automatic WWP-generated notice of eligibility is sent only on the FIRST enrollment. For subsequent enrollments, workers must verbally inform participants of the eligibility decision and when they can expect the next payment(s).

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1.5 REFERRALS TO OTHER RESOURCES

W-2 agencies must evaluate immediate and long-term safety and stability concerns and needs of the applicant and:

- 1. Provide information regarding local housing and emergency financial resources; and
- 2. Make appropriate referrals to assist the applicant in meeting immediate and long-term needs.

Potential referrals include but are not limited to:

- Wisconsin Emergency Rental Assistance Program (WERA);
- Wisconsin Home Energy Assistance Program (WHEAP);
- Internet and phone service assistance programs;
- Counseling;
- Securing family shelter funded through other assistance programs;
- Financial Education and Empowerment Resources;
- Wisconsin Shares Child Care Subsidy Program; and
- Other resources such as FoodShare, Medicaid/BadgerCare, W-2, Emergency Assistance (EA) and other local services.

See Chapter 7 for resources specific to DV.

02 NONFINANCIAL ELIGIBILTY

2.1 Nonfinancial Eligibility Overview

In order to meet nonfinancial eligibility for the LIFE program, the LIFE applicant must meet the following criteria as of the application date. For information on verifying nonfinancial eligibility, see Chapter 4.

- 1. Be 18 years of age or older;
- 2. Be a U.S. citizen or qualified non-citizen (see 2.2);
- 3. Be a parent* to one or more children under the age of 18 (see <u>2.4</u>) -OR- be currently pregnant;
- 4. Be experiencing domestic violence or the threat of domestic violence, or be fleeing a domestic violence situation (see 2.5); and
- 5. Be a resident of Wisconsin (unless the applicant is a migrant worker).

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2.2 U.S CITIZENSHIP OR QUALIFIED NON-CITIZEN STATUS

Every individual in a LIFE assistance group (see <u>2.4</u>) must either be a U.S. citizen or qualified non-citizen. See <u>W-2 Manual 2.4.2</u> for categories of qualified non-citizens.

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2.3 SOCIAL SECURITY NUMBERS

Every member of the LIFE assistance group (see <u>2.4</u>), including newborns, must provide a Social Security Number (SSN), or provide proof that any LIFE assistance group member without an SSN has applied for one, unless the individual is initially exempt.

See <u>W-2 Manual 2.7.1</u> for more information.

As part of the clearance process in WWP, the applicant's name, date of birth, and SSN are submitted through a data exchange with the Social Security Administration in an overnight batch process. If an SSN record returns with information that does not match, the BWF Work Programs Help Desk contacts the W-2 agency. W-2 agencies must review the discrepancy and work with the applicant to resolve the inaccurate information within three working days.

If the participant provides updated information regarding the mismatch, the W-2 agency worker must correct the appropriate fields in the Personal Information section of the **Client Registration** page, save the page, and leave the participant enrolled.

^{*} Custodial parent or non-custodial parent

If the W-2 agency is unable to get in contact with the applicant or the applicant is unable to provide new information, the W-2 agency must manually disenroll the applicant prior to close of business on the third working day following the enrollment date. See <u>4.7</u> for more information on disenrollment. The individual can re-apply at any time.

EXAMPLE: An applicant meets with a W-2 agency worker to complete the LIFE RFA on Monday, September 27. The RFA is completed and the applicant is enrolled the same day. During the overnight SSN verification process, the applicant's SSN returns as having a discrepancy. Tuesday morning, September 28, the BWF Work Programs Help Desk contacts the W-2 agency to inform them of the discrepancy. The W-2 agency has until close of business on Thursday, September 30, to resolve the discrepancy or disenroll.

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2.4 LIFE Assistance Group

The LIFE assistance group consists of the applicant and their dependent children. For pregnant applicants without dependent children, the assistance group is the applicant.

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2.5 DV SITUATION

LIFE program applicants must identify as being in a situation where they are experiencing or have a threat of domestic violence in the form of verbal, emotional, physical, or sexual violence, stalking, and/or controlling behaviors and have left or intend to leave the situation.

There is no verification required of this eligibility requirement. The applicant attests via the RFA signature that all the information provided is true and accurate to the best of their knowledge.

03 FINANCIAL ELIGIBILITY

3.1 FINANCIAL ELIGIBILITY OVERVIEW

As of the application date, the applicant is financially eligible if they meet one of the following requirements:

- 1. The applicant is either currently receiving or has received in the past 12 months one or more public benefits (see 3.2); or
- 2. Has income at or below 200% of the Federal Poverty Level (see 3.3).

There is no asset test for the LIFE program.

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3.2 RECEIPT OF PUBLIC BENEFITS

An applicant is considered financially eligible for the LIFE program if they are either currently receiving or have received in the past 12 months one or more of the following public benefits:

- 1. Supplemental Nutrition Assistance Program/Foodshare;
- 2. Temporary Assistance for Needy Families/W-2;
- 3. Child Care Subsidy Program;
- 4. Low Income Home Energy Assistance Program/WHEAP;
- 5. BadgerCare Plus or Medicaid;
- 6. EA;
- 7. Supplemental Security Income;
- 8. Women, Infant and Children Program;
- 9. Free and Reduced Lunch;
- 10. Head Start;
- 11. Public Housing Subsidy or Housing Choice Voucher (Section 8);
- 12. Job Access Loan; or
- 13. Transitional Jobs or Transform Milwaukee Jobs.

If an applicant has not received any of the benefits listed above, then the W-2 agency worker must apply the gross income test described in 3.3.

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3.3 INCOME

If the applicant meets the criteria described in 3.2, an income test is not required.

To determine countable income for the 200% FPL income test, the W-2 agency worker must choose one of the following two income test periods, depending on the situation of the applicant:

- Prospective income, making the best estimate to determine what monthly income will be received by the participant over the next 2 months (see <u>W-2 Manual 3.2.3</u> for more information on how to estimate income); or
- 2. Actual earned and unearned income received in the 30 calendar days prior to and including the application date.

Use W-2 policy for the following:

- Income Availability (see <u>W-2 Manual 3.2.4</u>);
- Qualified Alien Deeming (see <u>W-2 Manual 3.2.8.1</u>);
- Farm & Self-Employment Income (see W-2 Manual 3.2.8.2);
- Child Support Income (see <u>W-2 Manual 3.2.8.3</u>);
- Supplemental Security Income and Caretaker Supplement Income (see <u>W-2 Manual 3.2.8.4</u>); and
- Census Employment and Other Temporary Employment Income (see <u>W-2 Manual</u> 3.2.8.5).

04 CASE PROCESSING

4.1 GENERAL VERIFICATION GUIDELINES

As part of determining eligibility, W-2 agencies must verify certain eligibility criteria. (See 4.2)

For applicants already known to CARES Worker Web (CWW), the W-2 agency worker must attempt to verify available eligibility information via CWW and the Electronic Case File (ECF). If valid verification documentation already exists in one of these systems, do not request additional verification. The W-2 agency worker must view either the document in ECF or the data exchange verification in CWW and enter RFA Notes in WWP documenting the item that was viewed and the eligibility criterion the item was used to verify.

For eligibility items that cannot be verified via CWW or ECF, the W-2 agency worker must make a photocopy of the verification documentation, mark with the date the document was obtained along with the initials of the staff person who obtained the document, store in accordance with the guidance provided in <u>4.6</u>, and enter RFA Notes in WWP documenting the verification item. See <u>W-2 Manual 4.3.2</u> for additional guidance on vital records.

RFA Notes in WWP must include an explanation of factors leading to any eligibility determination that cannot be understood using paper documentation. If a W-2 agency worker obtains verification via a conversation with the applicant or a third party, the W-2 agency worker must enter RFA Notes in WWP describing the evidence and how he or she obtained the information.

The W-2 agency must assist the applicant in obtaining required verification if:

- 1. The applicant has made a reasonable effort and cannot obtain required verification;
- 2. The applicant does not have the power to obtain required verification;
- 3. The applicant requires assistance to obtain required verification; or
- 4. Extenuating circumstances exist that prevent the applicant from obtaining the required verification.

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4.2 VERIFICATION OF ELIGIBILITY CRITERIA

As part of determining eligibility, the W-2 agency must verify the following items:

- 1. Identity;
- 2. Parental status (when questionable) *;
- 3. Pregnancy (when applicable) *;
- 4. Birth Date:
- 5. SSN;
- 6. U.S. Citizenship or Qualifying Non-Citizen Status;
- 7. Wisconsin Residency *; and
- 8. Public benefit receipt*; or Income Level *.

*Can be verified using best available information

See <u>W-2 Manual 4.1.4</u> for information about the frequency of verification and <u>W-2 Manual 4.1.2</u> for suggested sources of verification.

Due to the applicant's crisis situation, it may be difficult or impossible to obtain needed verification. Therefore, W-2 agency workers can use the best available information as reported by the applicant for verifying eligibility requirements noted with an asterisk above in lieu of more conventional documentation, when necessary. Workers should first attempt to obtain verification from applicants using the sources of verification listed in W-2 Manual 4.1.2. If the item can be verified in a way that is readily available to the applicant, such as a bank statement from an application on an applicant's smart phone, workers must use the appropriate verification. Best available information in some cases may be the applicant verbally attesting that the information is true and accurate to the best of their knowledge.

W-2 agency workers must enter RFA Notes in WWP if the best available information policy has been utilized for an eligibility criterion.

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4.3 Using Data Exchanges to Verify Eligibility

Information forthcoming.

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4.4 RFA SIGNATURE

A valid RFA signature is required for an RFA to be considered complete. (See 1.3)

RFA signatures from the applicant can be obtained one of three ways:

- 1. **Written signature**: The applicant physically signs the printed RFA summary page.
- 2. **Electronic signature**: The applicant electronically signs the RFA summary page via an electronic signature software.
- 3. **Telephonic signature**: The applicant telephonically signs the RFA summary page during a recorded call using the <u>Telephonic Signature Script for LIFE</u>.

Written and electronic signatures must be stored in accordance with the guidance provided in <u>4.6</u>. For telephonic signatures, the Telephonic Signature Interaction ID must be documented in RFA Notes.

An applicant must not be enrolled in WWP until a valid signature has been obtained.

4.5 Working with Confidential Information

Information concerning applicants must not be disclosed for any reason except when it is necessary for the administration of the program or, under certain circumstances, unless requested by law enforcement officers. (See <u>W-2 Manual 4.2.3</u>) If the information requested is not directly related to program administration, it must not be provided.

All LIFE RFAs and associated documentation are considered confidential and must be stored in accordance with guidance provided in 4.6.

PINs are automatically marked as confidential in WWP at the point an RFA is created. Additionally, only the assigned W-2 agency worker and their supervisor have access to an applicant's RFA in WWP.

W-2 agency workers may not disclose LIFE program details in PIN comments in WWP or case comments in CWW. All RFA information must be noted in the LIFE RFA Notes.

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4.6 LIFE PROGRAM DOCUMENTATION

W-2 agencies must use the WWP system to process all RFAs for the LIFE program. The RFA is completed during an interactive meeting with the applicant. (See $\underline{1.2}$)

Agencies can access WWP through the following web address: https://wwp.wisconsin.gov/login

W-2 agency workers must record RFA information in RFA Notes.

All application materials are considered confidential and must be stored as a paper file under lock and key. Due to confidentiality, ECF cannot be used to store LIFE application materials.

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4.7 PROGRAM DISENROLLMENT

A participant receives three monthly payments unless the W-2 agency worker manually disenrolls the participant from the LIFE program. WWP automatically disenrolls following the third payment.

A W-2 agency worker may need to manually disenroll for the following reasons:

- There was an SSN discrepancy that could not be resolved in three working days (see 2.3);
- 2. The participant requested to be disenrolled;
- 3. The participant is deceased;
- 4. The participant is incarcerated; or
- 5. A check was undeliverable (or not picked up at the W-2 agency if using the agency as a mailing address) and the W-2 agency was not able to contact the participant for 30 calendar days.

If a W-2 agency needs to disenroll an applicant for any reason, they must send notification to the individual using a manual form, *LIFE Notice of Payments Ending (5394)* within five working days of disenrolling the participant. Day one is the working day following the disenrollment.

Each notice must include the following:

- The W-2 agency contact information;
- Date of eligibility determination;
- Disenrollment reason; and
- Any additional comments necessary.

To populate the field in the letter for the last payment issued, view the Payment Request Date from the **LIFE Payments** page in WWP. If the case is being closed due to an invalid SSN prior to any payments issued, populate "No Payments Issued" in the field.

A <u>Spanish version</u> of *Form 5394* is available when the home language is identified as Spanish on the **Client Registration** page.

Following a manual disenrollment, an individual can re-apply and be re-enrolled if they have not received all three payments and still meet all eligibility requirements.

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4.8 PARTICIPANT RELOCATION

If a participant is enrolled only in the LIFE program and they relocate to another service area, no transfer or disenrollment is necessary and should only occur in extenuating circumstances.

If a participant needs to transfer agencies within Milwaukee County, the LIFE RFA is assigned at transfer to the default W-2 agency worker identified by the new Milwaukee agency. The worker can reassign as needed within their agency. If a participant needs to transfer agencies in or out of Milwaukee County or between Balance of State agencies, the outgoing agency must disenroll for the applicant to re-apply at the new agency.

If a participant is enrolled only in the LIFE program and they later apply for W-2 at a different agency, the LIFE RFA is automatically disenrolled with the outgoing agency and re-enrolled with the new agency. The LIFE RFA is assigned to the new Financial and Employment Planner (FEP) on the W-2 case. The new FEP can reassign as needed within their agency.

If a participant is co-enrolled in W-2 and the LIFE program, W-2 agencies must follow established procedures as described in W-2 Manual 4.6 for the W-2 case when relocating and reapplying or transferring. For the LIFE RFA:

- For relocations in or out of Milwaukee County or between Balance of State W-2 agencies, when the participant reapplies with the new agency, the LIFE RFA is automatically disenrolled with the outgoing agency and re-enrolled with the new agency. The LIFE RFA is assigned to the new FEP on the W-2 case. The new FEP can reassign as needed within their agency.
- 2. For relocations within Milwaukee County, when the transfer occurs the LIFE RFA is assigned to the default W-2 agency worker identified by the new Milwaukee agency. The worker can reassign as needed within their agency.

05 PAYMENTS

5.1 PAYMENT AMOUNT

Eligible applicants receive a total of \$3,500 paid over three consecutive months:

Month 1: \$1,500 Month 2: \$1,000 Month 3: \$1,000

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5.2 PAYMENT PROCESSING

Payments to participants are automated and sent via the State of Wisconsin's STAR system. The address from client registration or alternate mailing address provided in the RFA is used to mail the check. These fields can be updated at any time.

W-2 agency workers must discuss with the applicant the most appropriate and safest mailing address to use so the applicant can receive checks and notices.

If the safest option is for the applicant to pick their check up from the W-2 agency or other agency office, the alternate mailing address must be updated. W-2 agency workers should also discuss with the applicant to ensure they have a safe plan for cashing the check and advise applicants of alternatives such as prepaid debit cards.

WWP delays sending the initial payment information to the Department of Administration (DOA) by three working days to allow for the SSN verification process to occur. (See <u>2.3</u>) At the close of business on the third working day following the enrollment date, WWP sends the payment information to DOA for processing through STAR, which takes two working days. The initial payment is mailed to participants five working days following the enrollment date for approved applications. Subsequent checks are mailed about the same time each month for up to an additional two months.

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5.3 LOST, STOLEN, OR DESTROYED CHECKS

If a check cannot be delivered, it is returned to the Department of Children and Families (DCF), who will then return it to the W-2 agency to follow-up with the participant.

For lost, stolen, or destroyed checks, agencies should use the Affidavit of Lost, Destroyed, or Stolen Checks or Benefits form (DCF-F-82-E) and send the Affidavit to the BWF Work Programs Help Desk. On the affidavit, indicate the check is for the LIFE program next to the Wisconsin Works (W-2) Payment checkbox. Agencies must keep a copy of the original affidavit for its records.

By submitting this form, the DCF Bureau of Finance (BOF) requests a stop payment on the check. If BOF is notified the check has not been cashed, they will issue a replacement check. W-2 agency workers must enter all information regarding the request and replacement check in RFA Notes.

If BOF is notified the check has been cashed, the W-2 agency will receive a copy of the cashed check. The participant examines the copy of the cashed check. If the participant claims they did not endorse or receive payment from the check, they must:

- Complete the <u>Affidavit Forged Endorsement</u> form (DOA-2789) and the <u>Handwriting Specimens</u> form (DOA-2790) in the presence of a witness; and
- 2. Sign and date the back of the photocopied check.

Agency staff must write the applicant's PIN in the upper left hand corner of forms DOA-2789 and DOA-2790 and make a copy of the individual's driver's license, State of Wisconsin Photo ID, or any other item containing the individual's signature.

The agency must send the following original documents to the Bureau of Finance:

Department of Children and Families Bureau of Finance, Accounts Payable P.O. Box 8916 Madison, WI 53708-8916

- 1. Two copies of the Handwriting Specimens form (2790);
- 2. Three copies of the Affidavit Forged Endorsement form (2789) (Give a fourth copy to the participant);
- 3. The signed and dated photocopy of the check; and
- 4. A photocopy of a signed driver's license, photo identification card, or other document with the participant's signature.

With these documents, the bank will initiate a forgery investigation. BOF will replace the check if the bank determines that the participant did not cash the original check. W-2 agency workers must document the results of the forgery investigation and replacement check (when applicable) in RFA Notes.

06 DISPUTE RESOLUTION

6.1 Introduction

There are two levels of review under the LIFE program Dispute Resolution process: 1) a Fact Finding Review; and 2) a Departmental Review.

The purpose of the Fact Finding Review is to resolve disputes for applicants who disagree with a W-2 agency's decision. A Departmental Review may be requested if an individual disagrees with a Fact Finding Review decision.

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6.2 FACT FINDING REVIEW

All applicants and recipients have the right to request a Fact Finding Review. The Fact Finding Review is completed by the W-2 agency's Fact Finder. It is the first level of the dispute resolution process an applicant or recipient can petition if the individual believes one of the following occurred:

- The agency did not act timely upon the LIFE RFA;
- The LIFE RFA was denied; or
- The LIFE payments were cancelled.

An applicant or recipient who requests a Fact Finding Review should be encouraged to submit a request in writing. A W-2 agency must also accept phone requests for Fact Finding Reviews and must document the phone request in RFA Notes. If an applicant or recipient requests a Fact Finding Review for a complaint not related to any of the above reasons, the W-2 agency must provide the petitioner with a denial in writing indicating the reason the request has been denied.

The Fact Finding Review request must be made within 45 days of the mailing date of the notice. If the 45th day falls on a weekend or holiday, the calculated date will be the next working day. If the request is received within the 45-day timeframe, the W-2 agency must schedule a Fact Finding Review. Fact Finding Reviews are not available if the agency action being contested occurred more than 45 days prior to the Review request. If the request for a Fact Finding Review is received beyond the 45-day timeframe, the W-2 agency must provide the petitioner with a denial in writing indicating the reason the request has been denied.

See <u>W-2 Manual 12.2.4 through 12.2.13</u> for information on the Fact Finding Review process and requirements. In addition to the items listed in <u>W-2 Manual 12.2.7</u>, W-2 agencies must ensure the LIFE RFA case record is complete and all necessary documents are present, as well as be prepared with LIFE Program and Policy Guide citations.

If the Fact Finding Review decision overturns the agency's denial or improper disenrollment due to an error, the agency must reprocess a new RFA to issue the applicant payment.

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6.3 DEPARTMENTAL REVIEW

If an individual disagrees with the final Fact Finding Review decision, they may appeal the decision by requesting a Departmental Review. The Department of Administration, Division of Hearings and Appeals (DHA) will complete the Departmental Review. This Review is a limited review of the record and the decision of the Fact Finder.

The request for a Departmental Review of a LIFE program decision must be received by DHA within 14 calendar days after the date on which the certified copy of the W-2 Fact Finding Review decision is mailed (the same date as the Fact Finding decision).

DHA must date stamp requests for a Departmental Review. DHA will promptly notify the W-2 agency of receipt of a request for a Departmental Review. The W-2 agency must submit the Fact Finding Review file to DHA within five working days after receipt of the request. DHA will fully review the W-2 agency's Fact Finding Review decision by completing a desk review.

If after reviewing the Fact Finding Review file, DHA determines that the file is inadequate, DHA may do any of the following:

- Remand the file to the W-2 agency to provide additional information;
- Hold a teleconference interview with the Petitioner and W-2 agency representative; or
- Request written supplementation from the Petitioner or W-2 representative.

DHA may grant a postponement of a telephone conference if the petitioner is not available due to a good cause reason. DHA may grant an extension of the decision. DHA must complete its Review within 10 working days of the receipt of the Fact Finding Review file, unless DHA determines the file is inadequate.

The Department must deny a request or must refuse to grant relief if the applicant or participant withdraws the request for a Departmental Review in writing.

See W-2 Manual 12.3.2 through 12.3.4 for information on the Departmental Review process.

07 TRAINING

7.1 Working with Domestic Violence Survivors

Working with traumatized clients is difficult and challenging. The experience can be retraumatizing for the client and for the caseworker. Traditional case management strategies may be insufficient for complex and critical conversations about domestic violence. It is for this reason integrating principles of trauma-informed care may help mitigate the impacts of trauma-related issues.

According to the Substance Abuse and Mental Health Services Administration (SAMHSA), the need to address trauma is increasingly viewed as an important component of service delivery—not just in the delivery of behavioral health services, but in the delivery of other support systems such as child welfare, criminal justice, education, and public benefits programs. To assist W-2 agencies in improving their capacity to better address the trauma-related issues of their clients, the Division of Family and Economic Security urges agencies to seek training and resources to increase understanding of the pervasiveness of trauma—especially in relation to domestic violence—and to its connections to client behavior and well-being.

Section Last Updated: 11/17/21 Policy Effective Date: 11/17/21

7.2 Training Opportunities to Increase Awareness of Domestic Violence and Trauma

The Division of Family and Economic Security is partnering with Sojourner Family Peace Center in Milwaukee to provide customized training on "Trauma-Informed Conversations with Survivors." The 2.5-hour training will take place in a live, virtual setting in November 2021 and will be recorded. The Division urges W-2 agencies to participate in the training opportunity and/or access the recorded session once it is made available.

Section Last Updated: 11/17/21 Policy Effective Date: 11/17/21

7.3 ADDITIONAL RESOURCES TO INCREASE AWARENESS OF DOMESTIC VIOLENCE AND TO ASSIST SURVIVORS

The <u>Appendix</u> of this Program and Policy Guide contains several additional resources to increase caseworkers' understanding of domestic violence and resources to assist survivors. The Division encourages W-2 agencies to explore these resources and become familiar with the financial literacy and empowerment resources for survivors.

APPENDIX - DOMESTIC VIOLENCE RESOURCES

General Domestic Violence Resources for Survivors, Advocates, and the Public

- Break the Silence Against Domestic Violence www.breakthesilencedv.org
- End Domestic Abuse WI https://www.endabusewi.org
- Joyful Heart Foundation
 https://www.joyfulheartfoundation.org/about-us/our-story/
- National Center on Domestic and Sexual Violence http://www.ncdsv.org/
- National Coalition Against Domestic Violence https://ncadv.org/
- National Network to End Domestic Violence (NNEDV) https://nnedv.org/about-us/what-we-do/
- National Resource Center on Domestic Violence <u>https://www.nrcdv.org/</u>
- SAMHSA's Concept of Trauma and Guidance for a Trauma-Informed Approach https://store.samhsa.gov/sites/default/files/d7/priv/sma14-4884.pdf
- Steps to End Domestic Violence https://www.stepsvt.org/home
- Sojourner Family Peace Center Milwaukee https://www.familypeacecenter.org/

Working with Domestic Violence Survivors

 Working with Survivors of Domestic Violence: A Training Resource Guide https://www.bc.edu/content/dam/files/centers/humanrights/pdf/DV_Training_Resource_Guide.pdf

<u>Financial Literacy and Empowerment Resources for Survivors</u>

- Allstate's Financial Literacy Program: Provides financial literacy and support services to survivors and gives grants to shelters which offer one-year financial literacy programs. https://allstatefoundation.org/what-we-do/end-domestic-violence/
- National Endowment for Financial Education: A national organization sharing skills to increase financial literacy.

https://www.nefe.org/

Savvy Ladies: A female-founded nonprofit providing financial education to women, and a 1:1
personal financial hotline offering private, safe guidance on money issues.
https://www.savvyladies.org/

Webinars on the Intersection of TANF and Domestic Violence

- "Intimate Partner Violence in the Time of COVID-19: TANF's Vital Role in Prevention" https://www.youtube.com/watch?v=bhptqWE6Dk8
- "The Difference Between Surviving and Not Surviving" https://www.youtube.com/watch?v=JSScBW1NDE8
- "The Intersection of Domestic & Sexual Violence and Homelessness" https://www.youtube.com/watch?v=AKjttMZ4DAI
- "The Courage to Leave" <u>https://www.youtube.com/watch?v=i0hij-L5c-A</u>