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TO: **Income Maintenance Supervisors
Income Maintenance Lead Workers
Income Maintenance Staff
W-2 Agencies
Workforce Development Boards
Job Center Leads and Managers
Training Staff
Child Care Coordinators**

FROM: Janice Peters, Director
Bureau of Wisconsin Works
Division of Family Supports

DFS OPERATIONS MEMO					
No:	07-55 (Corrected)				
DATE:	09/14/2007				
FS	<input type="checkbox"/>	MA	<input type="checkbox"/>	SC	<input type="checkbox"/>
CTS	<input type="checkbox"/>	CC	<input type="checkbox"/>	W-2	<input checked="" type="checkbox"/>
FSET	<input type="checkbox"/>	EA	<input type="checkbox"/>	CF	<input type="checkbox"/>
JAL	<input type="checkbox"/>	JC	<input type="checkbox"/>	RAP	<input type="checkbox"/>
WIA	<input type="checkbox"/>	Other	EP		
PRIORITY: HIGH					

SUBJECT: W-2 Work Participation Documentation, Verification and Supervision Policy and Procedures

CROSS REFERENCE: [Operations Memo 07-38, Best Practices for Wisconsin Works \(W-2\) Participation;](#)
[Operations Memo 06-45 \(Section Dealing with Entering Non-Participation on CARES Screen WPNH\);](#)
[Administrator's Memo 06-15, Changes to the W-2 Program Resulting from TANF Reauthorization](#)

EFFECTIVE DATE: September 30, 2007

PURPOSE

This memo provides:

1. Instructions and case examples for implementing the work participation documentation, verification and supervision procedures required under the Federal Temporary Assistance for Needy Families (TANF) Regulations. These procedures apply to all CSJ and W-2 T participants. The procedures also apply to individuals in the CMC placement who are voluntarily participating in activities;
2. CARES procedural guidance for assigning activities and tracking non-participation and good cause; and
3. Information on up-coming worker training.

BACKGROUND

The Federal TANF Regulations require states to have established and implemented work verification procedures no later than September 30, 2007. The TANF Regulations are explicit in requiring that all hours of work participation be supervised, documented and verified. A state may face significant financial penalties if, through the federal audit process, it is found that the state's TANF program is not in compliance with these requirements.

Over the past 11 months, Wisconsin has been working with the Federal Administration for Children and Families (ACF) to obtain approval of Wisconsin's Work Verification Plan, which lays out in detail our process for ensuring that all work activities in the W-2 program will be supervised, documented and verified. On September 10, 2007, Wisconsin was notified by ACF that the plan has been approved, allowing the Department to move forward with the steps for implementation. There are many policies in the Work Verification Plan that are dictated by the TANF Regulations and the further instructions issued by ACF. However, where ACF allowed flexibility, the Department sought input from W-2 agencies to ensure that Wisconsin's documentation, verification and supervision procedures are as closely aligned to current W-2 agency practices as possible.

The requirements that follow pertain to all W-2 participants who are in a CSJ or W-2 T placement. The requirements also pertain to individuals in the CMC placement who are voluntarily participating in activities.

DOCUMENTATION, VERIFICATION AND SUPERVISION CRITERIA

As explained in Operations Memo 07-38, there are certain W-2 activities that may count toward the TANF work participation requirement. Of those activities that count towards TANF work participation, some W-2 activities may be counted as Core activities and some may be counted as Non-Core activities. There are also some W-2 activities that cannot be counted toward the TANF work participation requirement because they do not meet the Federal definition of *work participation*.

Attached you will find a chart containing specific policies related to documentation, verification and supervision broken out by W-2 activities. Below is general information on these three areas of the chart. For more specific information for each W-2 activity, refer to the chart itself. In addition, this chart should be used as a desk aid for agency workers. It will be critical for workers to refer to the chart when determining how to document and verify a W-2 participant's attendance at assigned activities including actual time spent at each activity.

It should be noted here that while the Department is requiring documentation, verification and supervision for all W-2 activities, the process of documenting W-2 activities that do not count toward the TANF work participation requirement is more discretionary than the documentation of W-2 activities that do count toward the TANF work participation requirement. These two categories of activities have been separately addressed on the chart.

Documentation

For the purposes of implementing the new participation tracking procedures, *documentation* is the written record that substantiates or validates that work participation has occurred. The Documentation column in the attached chart describes the specific documentation requirements for all activities that count toward the work participation rate. This column describes the actual paperwork or forms that you will collect from the participant, worksite or other type of service provider that supports the participant's attendance at the activity. The chart specifically identifies the minimum information that must be captured on the documentation that will be used

to verify actual time spent on an activity. For those activities that do not count toward the TANF work participation requirement, agencies have discretion in the type of documentation it requires.

For documentation received by the agency that includes participation for any portion of an hour, the agency should round up and count it as a full hour of participation.

Forms

In the Documentation column, agencies are told specifically what minimum information must be captured on the paperwork. While the Department is not creating specific forms, agencies must revise existing local agency forms or create new forms that include this minimum information. Also, this section contains a list of acceptable methods of documentation for each W-2 activity. Whatever method of documentation your agency decides to use, it must contain the minimum information referenced immediately above it in that column on the chart.

Verification

The documentation described above serves as written *verification* that the hours of assigned activities were actually performed. The Verification column of the chart describes how and when agencies need to obtain and maintain the documentation for all W-2 activities, regardless of whether they count toward the work participation rate. While the method of documentation for activities that do not count toward the work participation rate is discretionary, agencies must have verification that all assigned W-2 activities were completed, or, if they were not completed, that nonparticipation was entered accordingly. All documentation verifying actual hours of participation must be obtained from the participant, worksite or other provider on a weekly or bi-weekly basis, as noted in the chart. The documentation discussed above must be maintained in the participant's paper case file or the Electronic Case File, except where a W-2 agency has a large number of participants engaged in the same activity at one location. In those circumstances, the documentation may be kept in a central location by the W-2 agency and must be made available upon request.

W-2 agencies are generally responsible for collecting verification for group activities when multiple participants are engaged in the same activity at one location. While it is the primary responsibility of the participant to return the paperwork to the agency verifying participation in activities that involve an individual activity log, if the agency can make arrangements to get the paperwork directly from the service provider, it should do so.

Verification items must be collected either weekly, twice per month or monthly based on the requirements laid out for each activity in the attached chart. When collecting verification items twice per month, the verification should cover participation from the 16th of the month through the end of the month and the first of the month through the 15th of the month to align with the W-2 participation period. Agencies should develop procedures for the collection of verification items that ensure that workers will have time to review the verification items and record any non-participation prior to W-2 pull-down.

Electronic Case File (ECF)

Verification must be maintained in a participant's file in the Electronic Case File system. Therefore, the following two new document types have been created:

1. Document Type *W-2 Attendance Tracking* – this document type is located in Sub-folder *Restricted File* and has a Document Code of *WAT*. The types of documents stored under this document type include all individual timesheets, group sign-in sheets, computer

printouts or other documentation verifying attendance at a W-2 activity, including education and training attendance documentation and facilitated job search activity tracking.

2. Document Type *W-2 Job Search Logs* – this document type is located in Sub-folder *W-2/FSET* and has a Document Code of *WJSL*. The types of documents stored under this document type include all self-directed job search logs and any documentation used to verify contact with employers, e.g., copies of business cards, employer letters, etc.

Note: In the event your agency does not yet have a scanner, this information must be contained in the participant's paper case file.

Supervision

For the purposes of implementing the new participation tracking procedures, a *supervisor* is an individual who monitors the participant's daily attendance and can attest to the validity of the participation documentation submitted by the participant or on behalf of the participant. The Federal TANF Regulations require that all activities that count towards federal work participation be supervised on a daily basis. However, daily supervision must occur for all W-2 activities, regardless of whether they count toward the work participation rate. The Supervision column of the chart describes the methods of daily supervision that must take place for each activity.

Most W-2 activities must have a supervisor on-site during the time the activity is scheduled. Examples of this include, but are not limited to: 1) work shop/training instructors; 2) Job Center Resource Room monitors; 3) work experience worksite managers; 4) W-2 case managers or other authorized W-2 staff person; and 5) medical treatment providers and qualified assessment agency staff such as physicians, nurses, receptionists, social workers, psychologists, etc.

Activities that cannot be reasonably supervised face-to-face, such as self-directed job search and self-directed physical rehabilitation, must be monitored through weekly contact with a W-2 case manager who will review the documentation and discuss participant's progress in the activity. For participants completing self-directed employment search, the W-2 agency must also conduct random follow-up on a minimum of 25% of participant's weekly contacts. See the chart for more information on these self-directed activities.

As noted under the Documentation section above, a Supervisor's Signature is required for all activities. While the signature may exist in an electronic format, it must be from the person who directly supervised the activity and the signature must be contained in the documentation submitted to the agency. It is primarily the W-2 participant's responsibility to get the signature of the person supervising the W-2 activity. While it is not anticipated that obtaining a supervisor's signature for most W-2 activities will be a problem, it is understood that it may not be possible in limited situations, for example at some medical appointments.

If the participant is unable to get a signature from a qualified medical provider or the staff of a qualified medical provider, the W-2 agency must assist the participant by attempting to verify the information contained in the individual activity log. If the agency is able to verify participation through a phone contact to the provider but cannot obtain the provider's signature, the agency should make a note of the phone contact on the individual activity log and file it with other participation verification in ECF. If, in its attempt to help verify actual participation, the agency determines that there is no clear evidence that the participant engaged in the activity, the hours must be entered as non-participation. Good cause for non-participation should be documented when appropriate.

CARES GUIDANCE

W-2 agencies will be responsible for ensuring that information captured through the participation documentation and verification process is accurately recorded in CARES.

Assigning Activities in the Employability Plan

Through meetings held with various W-2 agencies in 2006, the Department learned that some agencies give participants the flexibility to alter the dates and times of their work participation schedule each week to accommodate the needs of the family, local bus schedules, etc. To the extent possible, agencies must begin assigning work activities on the participant's Employability Plan (EP) for specific days of the week and for a specific number of hours on each day that the activity is assigned. This information should be recorded in the Remarks section for each activity on WPAS or provided to the participant in a separate written work schedule. If the participant is given a separate work schedule with details regarding each activity, the worker must indicate this in the Remarks section on WPAS and the work schedule must be scanned into ECF. The activity information entered on WPCS/WPCH must be accurate (i.e., begin date, weekly scheduled hours, daily scheduled hours, actual end date) and align with both the participant's EP on WPAS and the participation documentation received for the work activity.

There may be times, when the participants work schedule fluctuates due to the need to make up work hours missed earlier in the week. No action is necessary in CARES on the part of the worker when the participant makes up the missed hours unless the nonparticipation hours have already been recorded. See the Recording Non-Participation section for more information.

Recording Non-Participation

If the participant misses hours of participation for a day, and does not make up those missed hours at some point during the week in which they were assigned, all remaining missed hours must be recorded on WPNH. Workers must continue to record non-participation for one day at a time as described in Operations Memo 06-45. The non-participation hours should be entered for the same date the missed activity was assigned on the participant's EP.

When the weekly non-participation hours (including good cause hours) recorded on WPNH are subtracted from the weekly scheduled hours recorded on WPCS/WPCH, the resulting number should be equal to weekly actual hours found in the participation documentation received for the work activity.

Case Example:

Sarah is placed in a CSJ. Although she has her high school diploma, she has a very sporadic job history and has not worked in the five years since her son Daniel was born.

On Sarah's Employability Plan, she is assigned to the following schedule:

Monday: Work Experience: 6 Hours
 Tuesday: Work Experience: 6 Hours
 Wednesday: Employment Search (Self-Directed): 6 Hours
 Thursday: Work Experience: 6 Hours
 Friday: Work Experience: 6 Hours
 Total Scheduled Hours: 30

For each work activity, the following hours are assigned to Sarah on WPCS:

Work Experience: Weekly Scheduled Hours = 24; Daily Scheduled Hours = 6
 Employment Search: Weekly Scheduled Hours = 6; Daily Scheduled Hours = 6

Example 1:

One Friday afternoon, Sarah contacts her worker to tell her that she has family visiting from out of town the following Monday and will miss her assigned work experience that day. Her FEP

informs her that visiting with family is not good cause for non-participation, however, if Sarah is able to arrange to make the hours up later in the week with her work site supervisor, there will

be no loss of W-2 benefits. Sarah contacts her work site supervisor and is able to arrange to make-up the 6 hours of missed work experience during the remainder of the week. When the documentation is received by the W-2 agency, it is verified that Sarah has completed all 24 hours of assigned work experience for that week and all 6 hours of employment search.

No changes are needed in CARES.

Example 2:

The following week, Sarah does not submit any documentation to verify that her assigned employment search was completed. When the worker follow-ups with Sarah at their weekly case management meeting, she admits that she has not been in contact with the employers she was given for job leads that week. No good cause reason is provided. The worker receives documentation verifying that Sarah participated in all other hours of assigned work activity for that week.

Sarah's worker must enter 6 hours of non-participation for Employment Search on WPNH. Total actual hours of participation for that week is 24 hours.

Example 3:

Sarah's worksite supervisor contacts the W-2 agency to inform them that Sarah will be unable to complete work experience next week on Thursday and Friday because the worksite is closed down both days for remodeling. The worker receives documentation verifying that Sarah participated in all other hours of assigned work activity for that week.

Sarah's worker must enter 6 hours of non-participation for work experience for Thursday and 6 hours of non-participation for Friday on WPNH. Good Cause must be recorded for all hours of non-participation. Total actual hours of participation for that week is 18 hours.

There may be situations in which missed hours of an activity are recorded on WPNH and, after that entry has been made, the FEP receives documentation that shows that the participant did, in fact, participate. There are two specific ways to remedy situations in which non-participation has been recorded, but documentation is then received that verifies that a participant actually participated. The remedy FEPs must choose depends upon when the documentation verifying participation is received.

- 1) Delete the Non-participation Record: The FEP must use this first remedy if the documentation verifying participation is received **prior** to the W-2 Pulldown (W2P) date. If this is the case, the FEP can delete the non-participation record by accessing CARES screen WPNP. The FEP must place an "x" next to the non-participation record that needs to be deleted, press <PF14> to go to screen WPMA, choose the line(s) to be deleted, enter "AE" in the DEL CD field and press <PF17>. The FEP can then return to CARES screen WPNP and confirm that the record has been deleted by seeing if the "Y" indicator is in the DEL field next to the incorrect nonparticipation record. FEPs should not record good cause in this situation as this may negatively impact our TANF work participation rate.
- 2) Enter the "PA" Good Cause Reason for the Non-participation Entry: The FEP must use this second remedy if the documentation verifying participation is received **after** the W-2 Pulldown (W2P) date. If documentation verifying participation is received after W2P for a time period in which non-participation has already been recorded, the deletion line on WPMA is protected and the non-participation record cannot be deleted. Because this can

have a negative impact on our TANF work participation rate, a new good cause reason has been created for use solely in this situation. The FEP must use the "PA" [FIX NONPARTICIPATION AFTER W-2 PULLDOWN (W2P)] good cause reason code if the documentation verifying participation is received **after** the W-2 Pulldown (W2P) date. This is the only time that this new reason code can be used. As has always been the case, even before the new "PA" good cause reason was created, when a FEP adds good cause hours on WPMA after W2P, CARES will generate an edit message that informs the worker to issue a supplement payment. This message will include the amount to be issued based on the good cause hours entered multiplied by \$5.15.

Assigning Activities on WPCS/WPCH

It is critical that workers record the work activity phases accurately on WPCS/WPCH. In order to accurately represent the date in which a participant begins a new activity, caseworkers must follow instructions found in the *Wisconsin CARES Guide, Section 2 – Work Programs, Chapter 06, Version 3 – Posting Statuses and Components* for posting the S-Scheduled and A-Actual Phases for each activity on WPCS/WPCH. Instructions require the caseworker to:

- ✓ Report the Scheduled Phase of an activity when the W-2 participant is scheduled to participate in the activity, and the exact start date is known.
- ✓ Report the Actual Phase of an activity only after the activity has been verified to have actually begun. The BEGIN DATE on WPCS is the actual start date of the activity. Activities have started even if the participant fails to show up. The caseworker should update from the Scheduled to the Actual phase to process non-participation on WPNH if the participant misses the first day of the activity.

Adjusting Hours of Participation

When an assigned W-2 activity is scheduled to occur less often than weekly, the worker must record both a Begin Date and Actual End Date on WPCS for the week in which the activity occurred. This process will need to be repeated each time the activity occurs.

Example:

Dora attends mental health counseling (CM) on the second and fourth Wednesday of each month. In September her appointments are scheduled for September 5th and 19th. Dora's worker must record these two appointments separately on WPCS. On or after September 5th, the worker must record a Begin Date and Actual End Date of September 5th. On or after September 19th, the worker must record a Begin Date and Actual End Date of September 19th.

If a worker determines that the hours that an activity is assigned on WPCS should be either increased or decreased, the worker must record an Actual End Date for the activity and re-enter the activity with a new Begin Date and the new weekly and daily scheduled hours to reflect the change in the number of assigned hours.

Example:

As part of her W-2 participation requirement, Nora has been participating in 10 hours per week of English as a Second Language (EL) classes. Nora and her worker decide to reduce the

number of assigned hours to 5 per week effective October 1st. Nora's worker records an Actual End Date of September 30th on WPCS for the activity. On October 1st, her worker re-enters the EL activity with a begin date of October 1st and records the new number of weekly and daily scheduled hours.

Assigning Assessment, Treatment and Counseling Activities

When assessment activities, treatment or counseling are assigned, it may be necessary to initially estimate the **scheduled** hours on WPCS and return to screen to adjust the **scheduled** hours once the participant has completed the activity and the documentation is received.

Assigning Self-Directed Job Search

Self-directed job search, assigned under the W-2 activity Employment Search (ES) includes activities that are performed without face to face daily supervision. This may include looking for suitable job opportunities, contacting potential employers, applying for jobs, completing job interviews and completing follow-up contact with employers. The participant must keep track of self-directed job search using an individual activity log developed by the agency. The case manager must have a minimum of weekly contact (phone or face-to-face) with participant to discuss various job leads and progress made on employment contacts and sign the individual activity log.

The agency must provide detailed instructions to the participant on completion of the individual activity log to ensure actual participation time is documented. In the past, when assigning self-directed job search on WPCS/WPCH, some agencies used a formula approach, such as having one job contact equal to one or two hours of participation. While this approach may be used for assigning the activity on WPCS/WPCH, when the individual activity log is returned to the agency as verification, the agency may need to adjust the actual hours on WPCS/WPCH to make it consistent with the amount of time it actually took the participant to follow-through on their assigned activity.

Another approach agencies may want to consider to eliminate the need to adjust the actual hours on WPCS/WPCH is to require the participant to consistently complete the same number of actual hours of employment search each week. For example, if the participant is assigned 5 hours of self-directed job search and is able to complete the agreed upon contacts with the employers in 4 hours, the participant could be instructed to complete an additional hour of employment research on the internet, local newspaper, etc. to fulfill the 5 hours of assigned activity.

How Does Travel Time to Work Activities Affect Work Participation?

Workers must use the following guidance to determine when travel time should be included as part of the assignment of hours on WPCS/WPCH and the EP.

1. When two or more activities are assigned for the same day, the travel time (if any) between the two activities may be counted toward hours of participation. Travel time to the first activity and the time spent returning home after the last activity cannot be counted towards hours of participation.
2. When Employment Search (ES) is assigned, the travel time between interviews may be counted toward hours of participation. Travel time to the first job interview and the time spent returning home after the last one cannot be counted.

W-2 agencies should develop individual activity log templates for participants to use for tracking participation, when appropriate. Instructions should be provided to the participant on how to track actual hours of participation. These instructions should also be explained during employability plan meetings.

TRAINING

Training on this topic will be provided by DFS/BW-2 Partner Training Services. Details regarding training will be made available via the Learning Center, Training Times and will also be communicated to local Agency Training Liaisons.

CONTACTS

For Policy Related Questions: BW-2 Regional Office Staff

For CARES Processing Questions: W-2/CC Call Service Center

ATTACHMENT

Chart: Wisconsin Works Documentation, Verification and Supervision Criteria

Program Categories – FS – FoodShare, MA – Medicaid, SC – Senior Care, CTS – Caretaker Supplement, CC – Child Care, W-2 – Wisconsin Works, FSET – FoodShare Employment and Training, CF – Children First, EA – Emergency Assistance, JAL – Job Access Loan, JC - Job Center Programs, RAP – Refugee Assistance Program, WIA – Workforce Investment Act, Other EP – Other Employment Programs.

DWD/DFS/BW-2/HH