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**State of Wisconsin
Governor Jim Doyle**

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 Working Families
Division of Family and Economic Security

DFES OPERATIONS MEMO								
No: 09-62								
DATE: OCTOBER 13, 2009								
FS	<input type="checkbox"/>	MA	<input type="checkbox"/>	BC+	<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	<input type="checkbox"/>	*		
				EP	<input type="checkbox"/>			
PRIORITY: High								

SUBJECT: Hourly Participation Requirements for W-2 T and CSJ Placements

CROSS REFERENCE: [W-2 Manual, Section 7.4.1](#)
[W-2 Manual, Section 7.4.2.2](#)
[W-2 Manual, Section 8.3.2](#)
[W-2 Manual, Section 8.3.2.3](#)
[Operations Memo 07-38, Best Practices For Wisconsin Works \(W-2\) Participation](#)
[Operations Memo 08-50, TANF Final Rule](#)

EFFECTIVE DATE: October 30, 2009

PURPOSE

The purpose of this memo is to inform agencies of a change in W-2 policy concerning the hourly assignment of activities for W-2 T and CSJ participants.

BACKGROUND

The Wisconsin Biennial Budget for 2010-2011, 2009 Wisconsin Act 28, amended statutory language pertaining to the number of hours CSJ and W-2 T participants could be assigned to work training and education and training activities. Statutory language that limited work training activities to 28 hours (for W-2 T) or 30 hours (for CSJ) per week and education and training to 12 hours (for W-2 T) or 10 hours (for CSJ) per week was repealed. A new provision was added

to the statute that prohibits a W-2 agency from assigning more than 40 hours per week in combined activities to either a CSJ or W-2 T participant.

The statutory changes provide W-2 agencies with some additional flexibility in tailoring activities to the needs of each participant. This memo provides guidance to W-2 agencies on implementation of the new statutory provisions.

POLICY GUIDANCE

CSJ Policy

Current Policy

Under current policy, CSJ participants are generally expected to participate 40 hours per week. The FEP may require up to 30 hours per week of work training activities and up to 10 hours per week of education and training activities. Education and training hours may be aggregated to allow participants access to FEP approved education and training activities which require more than 10 hours per week.

New Policy

Effective October 30, 2009, the W-2 agency may assign up to 40 hours of activity which may include a combination of work training and education and training activities. The types of activities and number of hours that are assigned should be based on what will most quickly help the participant to overcome barriers and obtain the skills needed to find and maintain employment.

Workers should continue to refer to the [W-2 Manual, Section 7.4.1](#) for guidance on the types of activities that are appropriate for CSJ participants.

Pro-Rated CSJs

Current Policy

Under current policy, CSJ participants eligible for a prorated CSJ payment are expected to participate up to 40 hours per week in a combination of activities that include their unsubsidized job, work training activities and education and training activities. The W-2 agency is required to assign a specific number of work training hours and education and training hours per week based on the number of hours the participant is working in unsubsidized employment:

1/3 CSJ (Participant working in unsubsidized employment 20 to 29 hours per week) – assign up to 10 hours of work training and up to 10 hours of education and training;

1/2 CSJ (Participant working in unsubsidized employment 15 to 19 hours per week) – assign 11 to 15 hours of work training and up to 10 hours of education and training per week; and

2/3 CSJ (Participant working in unsubsidized employment 10 to 14 hours per week) – assign 16 to 20 hours of work training and up to 10 hours of education and training per week.

New Policy

Effective October 30, 2009, CSJ participants eligible for a prorated CSJ payment are expected to participate up to 40 hours per week in a combination of activities that include their unsubsidized job, work training activities and education and training activities based on the following guidance:

1/3 CSJ (Participant working in unsubsidized employment 20 to 29 hours per week) – assign up to 20 hours of activity which may include a combination of work training and education and training activities;

1/2 CSJ (Participant working in unsubsidized employment 15 to 19 hours per week) – assign up to 25 hours of activity which may include a combination of work training and education and training activities; and

2/3 CSJ (Participant working in unsubsidized employment 10 to 14 hours per week) – assign up to 30 hours of activity which may include a combination of work training and education and training activities.

W-2 T

Current Policy

Under current policy, based on the results of a formal assessment, which takes into consideration the limits of ability, the participant may be assigned up to 28 hours per week in W-2 T activities and up to 12 hours per week unless aggregated, in education and training .

New Policy

Effective October 30, 2009, based on the results of a formal assessment, which takes into consideration individual's abilities and limitations, the W-2 agency may assign up to 40 hours of activity which may include a combination of W-2 T activities (See [W-2 Manual, Section 7.4.2.2](#) for list of appropriate activities) and education and training activities. The types of activities and number of hours that are assigned should be based on what will most quickly help the participant to overcome barriers and obtain the skills needed to find and maintain employment.

Use of Education and Training Activities

Current Policy

Under current policy, W-2 agencies are able to aggregate education and training hours as described in the W-2 Manual, Section 8.3.2.2 on Aggregating Education and Training.

New Policy

Effective October 30, 2009, W-2 agencies are not limited in the number of education and training hours that may be assigned to CSJ and W-2 T participants. Therefore the Aggregating Education and Training policy no longer applies. Workers will have the ability to assign education and training activities based on the needs of the individual keeping in the mind the following:

1. The policies found in the [W-2 Manual, Section 8.3.2](#) that define what type of education and training activities may be assigned to a participant will not change as these are expressly defined in statute.
2. The policies found in the [W-2 Manual, Section 8.3.2.3](#) on Technical College Education are also expressly defined in statute and therefore will continue to apply.

Federal TANF Work Participation Requirements

W-2 agencies should use the new flexibility provided in these policy changes as an opportunity to tailor the assignment of activities to the needs of each participant while continuing to be cognizant of Federal TANF Work Participation Requirements. For most individuals, the Federal requirements offer relative flexibility in how work participation is met. Refer to Operations Memos [07-38](#) and [08-50](#) for a review of Federal TANF Work Participation Requirements.

CARES and Work Program Activities

No changes are needed in CARES to implement these policy changes. The attached document, *Definitions and Codes for Work Program Activities in CARES*, has been updated. Language in the document that identified the activity as countable towards the work training requirement or the education and training requirement has been removed.

REQUIRED AGENCY ACTION

Case Reviews

As part of the next Employability Plan review for each W-2 case, workers must review all activities assigned to the case to determine if the activities or the hours assigned for each activity should be adjusted based on the changes in policy.

ATTACHMENT

Definitions and Codes for Work Program Activities in CARES

CONTACTS

For Policy Related Questions: BWF Regional Office Staff

For CARES Processing Questions: W-2/CC Help Desk

*Program Categories – FS – FoodShare, MA – Medicaid, BC+ – BadgerCare Plus, 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.

DCF/DFES/BWF/HH