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State of Wisconsin
Governor Scott Walker



TO: **W-2 Agencies
Training Staff**

FROM: Margaret McMahon, Director
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BWF OPERATIONS MEMO

No: 15-06

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JAL	<input type="checkbox"/>	RAP	<input type="checkbox"/>	Other EP	<input type="checkbox"/> *

SUBJECT: Wisconsin Works (W-2) Agency Best Practices for Meeting the Federal Temporary Assistance for Needy Families (TANF) Work Participation Rate (WPR) Requirements

CROSS REFERENCE: Operations Memo 13-48, Attachment: "W-2 Contractor Payment Structure 2013 – 2016 Contracts"
[Operations Memo 07-55](#), W-2 Work Participation Documentation, Verification and Supervision Policy and Procedures

EFFECTIVE DATE: Immediately

PURPOSE

The purpose of this memo is to provide W-2 agencies with best practice strategies for:

1. Meeting the Federal TANF work participation requirements; and
2. Improving employment outcomes for W-2 participants.

The Department plans to release another memo in April 2015 that will detail the Web Intelligence (WebI) reports that agencies can access to track work participation.

BACKGROUND

Under Federal TANF regulations, states must meet a specified WPR in its TANF assistance program each federal fiscal year. The TANF WPR is the proportion of adult TANF recipients who must participate in work activities for a specified number of hours each week in relation to the overall number of families receiving TANF cash assistance.

- **Note:** Refer to Operations Memo 13-48, Attachment: “W-2 Contractor Payment Structure 2013 – 2016 Contracts”, pages 19 – 22, for an overview of the TANF work participation requirements for Community Service Jobs (CSJ) and W-2 Transitions (W-2 T) participants and for second parents in two parent households that are receiving federally funded child care.

States that do not meet the minimum WPR may be penalized. The first year in which a state fails to meet the all-families WPR can result in the state’s TANF block grant being reduced by up to 5 percent. For Wisconsin, the maximum first year penalty is approximately \$15.7 million. The maximum penalty increases by 2 percentage points for each subsequent year of noncompliance, though the total cannot exceed 21 percent of the state’s grant.

In addition to helping individuals overcome employment barriers and develop the skills needed to become employed by assigning activities, W-2 agencies must ensure that individuals are participating in appropriate work and training activities to the fullest extent possible to help Wisconsin meet the TANF WPR.

The following list is a summary of the best practice strategies that will help individuals prepare for employment while also meeting the TANF work participation requirement.

1. Complete a comprehensive vocational assessment on all W-2 applicants and participants;
2. Maximize use of Work Experience;
3. Increase use of Job Skills Training;
4. Carefully select CARES Activity Codes;
5. Assign a Sufficient Number of Hours of Federally Countable Activities;
6. Reduce nonparticipation;
7. Assign appropriate W-2 Activities for 18 and 19 Year Olds;
8. Increase participation among W-2 T participants; and
9. Process W-2 cases timely.

BEST PRACTICES STRATEGIES

1. Complete a Comprehensive Vocational Assessment on all W-2 Applicants and Participants
Vocational assessments help individuals explore their unique career interests, aptitudes and skills, and formulate immediate and long-term career goals. Upon completion of a vocational assessment, the participant and Financial and Employment Planner (FEP) should be able to identify employment opportunities in the local labor market that are a good match for the participant immediately or after completion of required training.

2. Maximize Use of Work Experience

When assigning Work Experience as the primary work training activity, assign at least 25 hours per week. This ensures that even with a small amount of non-participation, the participant is still able to meet the 20 hour Core work participation requirement.

When assigning work experience:

- a. The FEP must use vocational assessment results to place participants at work experience sites that are meaningful to the individual and are a good match with his or her skills, interests, and abilities; and
- b. W-2 agencies must have sufficient work experience sites to meet the needs of all their participants. To do so, agencies may:
 - Seek out non-profit organizations whose mission includes community service.

- Partner with businesses that receive State or Federal funding.
- Promote the Work Opportunity Tax Credit which offers a Federal income tax credit to employers as an incentive to hire people in several target groups including TANF Recipients.
- Research local labor market trends to identify high-growth industries that may be open to becoming a work site for potential future hires.

3. Increase Use of Job Skills Training

Job Skills Training (JS) by itself or combined with Vocational Adult Basic Education (VA), Vocational English-as-a-Second Language (VE), or Vocational Literacy (VL) may count as a Core activity for up to 12 months in a participant's lifetime.

- **Note:** FRED Report #07 available in Webl, tracks participants' assignment to Job Skills Training and Technical College activities over their lifetime.

Education and training hours may be aggregated to allow W-2 T and CSJ participants access to short-term intensive job skills training programs that require more than 10 or 12 hours of participation per week. Agencies can apply this policy for education and training programs that a participant can complete within a one-year period with participation in up to 516 hours of education and training activity. (See W-2 Manual, Section [8.3.2.3](#))

- **Note:** Up to one hour of unsupervised study time (TT) for each hour of class time plus supervised study time required for job skills training is counted as assigned hours.

Job Skills Training is a highly effective method for moving individuals into jobs when the training is designed for the local labor market, with an emphasis on high growth, high demand occupations. In addition to matching participants with training slots available in quality training programs, the following are strategies that W-2 agencies may use to provide participants with access to training:

- a. Design training programs in response to an employer request to hire a specific number of trained individuals or for jobs currently in high-demand in the local labor market.
- b. Work with training providers such as Technical Colleges and Workforce Development Boards to customize an existing training program for groups of W-2 participants.
- c. Partner with employers, training providers and community organizations to design sector-based training for specific industries. This strategy addresses both the workforce needs of employers and the needs of workers for relevant training to advance into good jobs.
- d. Create linkages to high demand Pre-Apprentice and Apprentice programs.
- e. Connect participants with short-term training programs offered through Wisconsin Technical Colleges. Many of the certificate and technical diploma programs offered through the Technical College system may be completed in one or two semesters, including:
 - [Heating and Air Conditioning Service Technician Certificate](#) offered through Northcentral Technical College;
 - [Early Childhood Education Specialist Technical Diploma](#), offered through Milwaukee Area Technical College; and
 - [CNC Production Technician Certificate](#) offered through Gateway Technical College.

Check out the websites for Technical Colleges around the state to learn about how certificate and technical diploma programs can put participants' on a career path, including:

- [Blackhawk Technical College Career Clusters](#); and
- [Northcentral Technical College Career & Program Pathways](#)

4. Carefully Select CARES Activity Codes

If an activity fits the definition of both a federally countable work activity and a non-federally countable activity, always use the activity code for the federally countable activity. Under the definition for each activity in the W-2 Manual, there is a note explaining whether the activity counts towards Federal work participation, and if the activity counts as a Core or Non-Core activity. (See W-2 Manual, [Appendix – Activity Codes](#).)

Examples:

- Use the W-2 activity code Physical Rehabilitation (PR) when assigning personal care activities that are anticipated to last six months or less and are geared towards helping the individual recover from a medical condition so that she or he may enter the workforce. This is counted as a Core activity for a limited time. If this activity is assigned under the activity code Ongoing Medical/Personal Care (MP) it is not counted as Federal work participation.
- There are some activities that fit under the definitions for both Life Skills (LF) and Personal Development (PD). Assign Life Skills (LF) whenever possible, as this activity is counted as a Core activity for a limited time. Personal Development (PD) is not counted as Federal work participation.

5. Assign a Sufficient Number of Hours of Federally Countable Activities

About 39% of W-2 participants fail to meet the work participation requirements each month because they are not assigned to sufficient hours of federally countable work activities, or the activities that are assigned may only be counted for a limited time. W-2 agencies must assign participants to a sufficient number of hours to meet their federal work participation requirement, with the exception of those participants with medical restrictions. Two specific strategies for assigning sufficient hours include: a) Tracking time limits on Job Search and Job Readiness activities; and b) Combining Core and Non-Core activities.

- **Note:** Refer to Operations Memo 13-48, Attachment: "W-2 Contractor Payment Structure 2013 – 2016 Contracts", pages 19 – 22, for an overview of the TANF work participation requirements and an explanation of Core and Non-Core activities.

a. Tracking Time Limits on Job Search and Job Readiness Activities

W-2 activities that fall under the Federal category, Job Search and Job Readiness, may count toward the 20 hour per week Core requirement for no more than 240 hours for a single parent of a child under age six and 360 hours for all other work-eligible individuals. Hours may be counted for no more than 4 consecutive weeks. The timeframe for these limits is the preceding 12 months. These activities include:

- Disability and Learning Assessment (AD)
- AODA Counseling (CA)
- Career Planning & Counseling (CE)
- Occupational Testing (OC)
- Mental Health Counseling (CM)
- Career Advancement Services (CR)
- Job Retention Services (JR)
- Employment Search (ES)
- Job Readiness/Motivation (MO)
- Mental Health Assessment (AM)
- AODA Assessment (AA)
- Physical Rehabilitation (PR)
- Life Skills (LF)
- Physicians Assessment (AL)
- Mentor/Coach (MN)

W-2 agencies can help ensure that Job Search and Job Readiness activities maximize participants' opportunities to become employed while also taking into consideration the Federal work activity time limits by:

- 1) Assigning full-time Job Search and Job Readiness activities only when an individual is placed in CMJ and is not included in the Federal WPR. Once an individual is placed in a CSJ or W-2 T, adjust activities so that Job Search and Job Readiness activities are combined with other appropriate Federally countable work activities.
- 2) Adjusting the activities when the participant reaches the 240/360 hour time limit, so that participation requirements are met through assignment to other Core activities.

➤ **Note:** FReD Report #06A available in Webl, tracks participants' assignment to Job Search and Job Readiness activities over the last 12 months.

b. *Combining Core and Non-Core Activities*

The following are examples of how FEPs can combine Core and Non-Core activities to help meet the TANF work participation requirement.

- 1) Work Experience: 25 hours + Job Search and Job Readiness activities: 5 hours + Basic Education (i.e., ABE, ESL or Literacy) or General Educational Development (GED): 5 to 10 hours = 35 to 40 hours per week.
- 2) Job Skills Training: 25 hours + Job Search and Job Readiness activities: 10 hours = 35 hours per week.
- 3) Job Skills Training: 15 hours + Work Experience: 10 hours + Job Search and Job Readiness Activities: 10 hours = 35 hours per week.
- 4) For CSJ and W-2 T participants who are working part-time, combine unsubsidized employment hours with other Core activities to bring them up to a minimum of 25 hours per week. Core activities may include Work Experience, Job Skills Training, and Job Search and Job Readiness activities. Assign additional activities such as Basic Education, as appropriate.

Example: Sarah works 15 hours per week in unsubsidized employment. The FEP places her in a 1/2 Pro-rated CSJ because she lacks the skills needed to allow her to be competitive for a full-time unsubsidized job. In addition to working part-time, her FEP assigns her to 20 hours per week of Job Skills Training and 5 hours of Employment Search. Her combined total hours of participation per week are 40 hours of Core activities.

6. Reduce Non-Participation

Some participants have barriers that cause habitual non-participation or they lack the motivation to fully engage in the activities assigned to them. W-2 agencies must consider strategies that will help reduce non-participation. Examples include:

- a. Match work experience sites and job skills training to the interests, skills and employment goals of each participant. Individuals who are engaged in work activities that are meaningful to them are more likely to participate.

- b. Create or identify work sites that are flexible in meeting the needs of the participants. Examples: 1) Worksites that allow a participant to make up hours of non-participation on an alternative day; 2) Worksites that allow a participant to leave for part of a workday to attend to family issues and return to complete his/her participation later in the day.
- c. Schedule activities to minimize the amount of daily travel and limit the number of daily activities. For example:

Monday: Work Experience: 6 Hours + Adult Basic Education: 2 Hours

Tuesday: Work Experience: 6 Hours

Wednesday: Employment Search: 5 Hours + Adult Basic Education: 2 Hours

Thursday: Work Experience: 7 Hours

Friday: Work Experience: 6 Hours

7. Assign Appropriate W-2 Activities for 18 and 19 Year Olds

Teen parents, ages 18 and 19 and who have not completed high school, may meet their work participation requirement either through the combination of Core and Non-Core activities or through participation in activities that meet the federal definition of Satisfactory School Attendance. These activities include General Educational Development (GED), High School Equivalency Diploma (HSED), and Regular School. For Satisfactory School Attendance, there is not a specific assignment of hours required. Participants must demonstrate that they are making progress towards completion of their diplomas. (See W-2 Manual, [Section 8.3.2.1, Education Activities for 18 and 19-year old CSJ Participants.](#))

FEPs must carefully explain to 18 and 19 year olds the option to meet their W-2 participation requirement through activities that prepare them for a GED, HSED, or through attendance at a high school program. Appropriate coding of these activities in CARES are General Educational Development (GE), High School Equivalency Diploma (HE), or Regular School (RS). If an 18 or 19 year old is attending Adult Basic Education activities with a goal of obtaining a GED or HSED, the FEP must assign either GED (GE) or HSED (HS).

8. Increase Participation Among W-2 T Participants

W-2 T participants are less likely to meet the TANF work participation requirements than CSJ participants. W-2 agencies must tailor strategies for increasing participation to the needs of the individual, including:

- a. Use motivational techniques during the W-2 application phase. Through the assessment process and completion of the Barrier Screening Tool, individuals are given the opportunity to provide information about medical conditions and other employment barriers. However, rather than explaining formal assessment and the Medical Capacity Form as a means to determine how many hours a participant is able to work, the FEP should emphasize to W-2 T participants that formal assessments determine what accommodations can be implemented and the supportive services that help them engage in assigned activities.
- b. Develop or sub-contract with Supported Employment work sites. Supported Employment enables individuals with severe disabilities (i.e. psychiatric, cognitive and learning disabilities, traumatic brain injury) to perform paid competitive work in a setting where they are able to interact with non-disabled persons to the fullest extent possible. Supported Employment provides assistance such as job coaches, transportation, assistive technology, specialized job training, and individually tailored supervision.

- c. Develop worksites onsite at the W-2 agency for individuals with more severe employment barriers and provide transportation when public transit or a personal vehicle is not an option.
 - d. Seek alternative work experience activities, such as:
 - Reading to individuals at Senior Citizen Centers or Long Term Care Facilities;
 - Volunteering at organizations such as St. Vincent De Paul, Head Start, and Salvation Army.
 - e. Assign the activity, Caring for Disabled Child (CD), or Caring for Other Family Member (CF), for any hours that a participant is needed in the home to care for a disabled family member. When either of these activity codes is assigned, the participant is not counted in the WPR.
 - f. Consult with disability professionals, organizations, and websites to identify worksite and training accommodation solutions for individuals with more challenging needs, including:
 - 1) Division of Vocational Rehabilitation (DVR)
Contact your local DVR program to discuss areas of coordination such as cross-training and technical assistance. Make referrals to DVR for W-2 participants who may benefit from vocational rehabilitation services. The [Technical Assistance Guide](#) is a reference guide that provides both W-2 and DVR agency staff with practical strategies for improving communication, coordination and provision of services across the two programs.

DVR is required to implement a waitlist when there are not enough resources to serve everyone who is eligible for DVR services. Contact your local DVR office for more information about the current waitlist.
 - 2) Job Accommodation Network Website
This website provides a range of resources, including accommodations that have been determined effective for specific types of medical conditions. The disability-specific accommodation information can be accessed from the link: [A-Z OF DISABILITIES AND ACCOMMODATIONS](#).
9. Process W-2 Cases Timely
CARES case processing must be done timely to ensure that W-2 participation is accurately counted in the WPR.
- a. Run W-2 eligibility with dates in CWW to add a newborn to a W-2 case effective the month the child is born.
 - b. Process W-2 Extensions and W-2 Reviews timely to prevent improper case closures.
 - c. Record non-participation on CARES screen WPNH timely to ensure that Preliminary FReD and WPR reports in Webl provide accurate work participation data.

AGENCY ACTION

Review W-2 participants that are not meeting the TANF work participation requirement to determine what combination of services and strategies will be most effective at increasing participation in work, training and education activities.

Agencies can use the following WebI reports to identify individuals to target for this review:

- CARES-RP740 TANF: W-2 TANF Activities Detail Report
- WPR Report 03: Individual Participation Detail by Contract Agency

CONTACTS

For W-2 Policy Questions in the Balance of State: Bureau of Regional Operations, W-2 Regional Coordinators

For W-2 Policy Questions in Milwaukee: Milwaukee Operations Section Regional Administrators

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

DCF/DFES/BWF/HH