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State of Wisconsin
Governor Scott Walker



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

FROM: Margaret McMahon, Director
Bureau of Working Families
Division of Family and Economic Security
Department of Children and Families

BWF OPERATIONS MEMO

No: 16-08 (Amended)

DATE: 6/13/2016 6/27/2016

W-2	<input checked="" type="checkbox"/>	EA	<input type="checkbox"/>	CF	<input type="checkbox"/>
JAL	<input type="checkbox"/>	RAP	<input type="checkbox"/>	Other EP	<input type="checkbox"/> *

**SUBJECT: Modernizing CARES Work Programs Subsystem – CMF and CMU
Placement Policies and Systems Changes**

CROSS REFERENCE: Administrator's Memo [16-02](#)
W-2 Manual, Sections [2.9.2.4](#), [3.1](#), [4.6.1](#), [4.6.2](#), [6.1](#), [6.2.1](#), [6.2.2](#),
[7.2.2](#), [7.2.3](#), [7.2.4.8](#), [7.2.5](#), [11.4.2](#), [17.2.2](#)
Operations Memos [12-65](#), [13-09](#)
Wis. Stat. ss. [49.1475](#), [49.145\(2\)](#)

EFFECTIVE DATE: Immediately

PURPOSE

The purpose of this memo is to:

1. Provide an overview of the Case Management Follow-up (CMF) and Case Management Underemployed (CMU) placement, review, and transfer policy and systems changes that the Bureau of Working Families (BWF) has made in an effort to modernize the CARES Work Programs (WP) subsystem;
2. Remind W-2 agencies of the actions they must take in preparation for the June 25, 2016 systems changes.

BACKGROUND

As outlined in Administrator's Memo [16-02](#), the Department of Children and Families (DCF's) goal is to modernize the CARES WP subsystem from a mainframe system to a web-based application. One project in this effort focuses on moving case-based CARES WP screen information and system functions to CARES Worker Web (CWW). This is one memo in a series

of memos describing the changes to CWW, any related policy changes, and reminding W-2 agencies of the actions that they must take in order to prepare for the changes. Because these changes are related to the CMF placement, understanding these changes is important to ensuring that agencies are able to receive performance outcome payments for assisting participants in obtaining unsubsidized employment.

This particular memo focuses on policy and automation enhancements to align CMF placements with eligibility requirements in state statute. Also, this automation project allowed BWF to address inefficiencies and provide clarifications with regard to CMF and CMU placement, review, and transfer policies.

POLICY AND CWW CHANGES

- **Note:** The following policy changes are tracked in the attached document. Policy that has been removed is struck through and policy that has been added is underlined.

CHANGES TO CMF ELIGIBILITY REQUIREMENTS

Current Policy

A W-2 participant that obtains employment while participating in W-2 and transitions to a CMF placement is allowed to receive case management services regardless of whether he or she meets W-2 financial and nonfinancial eligibility requirements.

However, Wis. Stat. s. 49.1475 allows a W-2 agency to provide case management services to participants that obtained unsubsidized employment regardless of income and asset levels, and pursuant to Wis. Stat. s. 49.145(2), all W-2 participants must meet nonfinancial eligibility requirements.

Policy Change:

CMF placement policy now aligns with state statute, which requires that participants in CMF placements must meet all nonfinancial eligibility requirements in order to remain open in the CMF placement and receive ongoing case management services.

W-2 agencies may continue to disregard income and assets when determining CMF eligibility. (See attached sections 2.9.2.4, 3.1, 7.2.3, 7.2.3.2, 7.2.3.4, 7.2.4.8, and 17.2.2)

CWW Change:

If a CMF participant does not meet W-2 nonfinancial eligibility requirements and the Financial and Employment Planner (FEP) has not ended the W-2 episode which will end the placement, CWW will auto-end-date the CMF placement and the W-2 episode.

CWW CHANGE TO SUPPORT CMF 12-MONTH POLICY CLARIFICATIONCurrent Policy:

W-2 agencies are required to provide case management services to participants in CMF placements for at least 12 months. While CMF participants rarely receive services beyond 12 months, CARES currently allows CMF placements to remain open beyond 12 months.

Policy Change:

No change. However, in an effort to promote data integrity, CARES will end W-2 placements after 12 months of case management services.

CWW Change:

If a participant wants to receive case management services beyond 12 months, FEPs must determine financial and nonfinancial eligibility and, if eligible, change the placement type to CMU. This change is effective June 25, 2016.

The ending of CMF placements at 12 months will occur gradually in an effort to minimize any impacts on performance outcome payments. Between June 25, 2016 and December 31, 2016, the following will occur:

1. On June 25, 2016, for cases in which W-2 eligibility is closed, but the CMF placement is open, the system will keep these placements open through December 31, 2016, unless otherwise ended by the agency. This is to support agencies in submitting POP claims through the end of 2016.
2. On June 25, 2016, for cases in which eligibility and the CMF placement are open, the system will keep these placements open only as long as the cases continue to meet nonfinancial eligibility requirements.
3. As of June 25, 2016, the system will end the W-2 episode for any CMF placement that is open for more than 12 months, thus ending the placement.

ALLOWANCES FOR CMF AND CMU OVER-THE-PHONE ELIGIBILITY REVIEWSCurrent Policy:

There are some allowances for FEPs to conduct Employability Plan (EP) meetings by phone for participants in CMF or CMU placements. Allowances for each placement and meeting type are as follows:

CMF Placements:

- *Ongoing EP review meetings* – When a W-2 participant transitions from a paid placement to a CMF placement, the FEP may conduct a meeting to develop the CMF EP by phone if the participant's work schedule makes it difficult to meet face-to-face. FEPs may also conduct ongoing EP review meetings with participants in CMF placements by phone. (W-2 Manual, Sections 6.1 and 6.2.2)
- *Eligibility reviews* – Policy does not make an explicit allowance for over-the-phone CMF placement eligibility reviews. (W-2 Manual, Section 7.2.3.4)

CMU Placements:

- *Initial EP* – When making a CMU placement, FEPs must conduct the meeting to develop the initial EP in person. (W-2 Manual, Section 6.1)
- *Ongoing EP review meetings* – FEPs may conduct ongoing EP review meetings with participants in CMU placements by phone if the participant's work schedule makes it difficult to meet face-to-face. (W-2 Manual, Section 6.2.2)
- *Eligibility reviews* – Policy does not make an explicit allowance for over-the-phone CMU placement eligibility reviews. (W-2 Manual, Sections 7.2.2 and 7.2.3.4)

Policy Change:

In an effort to make it easier to serve working parents, BWF is expanding allowances for over-the-phone EP and eligibility review meetings for CMF and CMU placements. Expanded allowances for each placement and meeting type are as follows:

CMF Placements:

- *Ongoing EP review* – No change.
- *Eligibility reviews* – Updates to W-2 policy allow FEPs to conduct CMF placement eligibility reviews by phone. (See attached section 7.2.3.4)

CMU Placements:

- *Initial EP* – No change.
- *Ongoing EP review meetings* – No change. Note: W-2 Manual section 7.2.2 now also reiterates this allowance. (See attached section 7.2.2)
- *Eligibility reviews* – Updates to W-2 policy allow FEPs to conduct CMU placement eligibility reviews by phone. (See attached sections 7.2.2 and 7.2.3.4)

Eligibility and EP reviews for both placement types must continue to occur at least every six months.

CWW Change:

CWW supports these policy updates with a new interview type, *CMF/CMU Phone Review*, on the Application/Review Interview Details page, as illustrated in the screenshot below.

The screenshot shows a web application window titled "Application / Review Interview Details". The window contains a table with the following data:

Request / Review Date	Program	Mode	Interview Type	Last Updated
03/03/2016	WW - W-2	Review	C - CMF/CMU Phone Review	

Below the table, there are two date input fields: "From Date" and "To Date", both with a calendar icon. A "Go" button is located to the right of the "To Date" field. At the bottom of the form, there is an "Add Case Comment" button on the left, and "Cancel", "Previous", and "Next" buttons on the right.

MODIFIED EMPLOYMENT VERIFICATION REQUIREMENTS FOR CMF PLACEMENTS:Current Policy:

FEPs must first verify employment, actual work start date, wages, and expected number of hours worked prior to making a CMF placement if a W-2 applicant obtains unsubsidized employment during Up-front Job Search. FEPs must also verify the same information prior to changing a participant's placement from TEMP, CSJ, W-2T, or CMC to CMF when the participant obtains unsubsidized employment.

Policy Change:

In an effort to simplify a participant's transition to a CMF placement after obtaining unsubsidized employment, and to avoid related overpayments, FEPs may now change a W-2 participant's placement from a paid placement to CMF prior to receiving written employment verification if the participant provides a verbal statement that he or she has started employment. The start date of the CMF placement must be the participant's first day worked. Additionally, FEPs may place applicants assigned to Up-front Job Search that obtain unsubsidized employment in CMF prior to receiving written employment verification. (See attached sections 2.9.2.4 and 7.2.3.1)

CWW Change:

No automation changes associated with this policy change.

CHANGES TO RELOCATION AND TRANSFER POLICIES FOR CMF PLACEMENTSCurrent Policy:

W-2 participants who relocate into or out of Milwaukee County or between the Balance of State (BOS) agencies must reapply at the W-2 agency serving the address to which they have relocated, with the exception of CMF participants. W-2 agencies must give CMF participants the option to remain with the current W-2 agency serving the contract area from which they are relocating. For those CMF participants who relocate from one contract area in Milwaukee to another contract area in Milwaukee, they have the option to remain with the W-2 agency that they are currently working with to receive ongoing services or transfer to the W-2 agency that serves the contract area to which they have relocated. (W-2 Manual, Section 4.6.1)

Policy Change:

CMF placements may not remain open at the current W-2 agency when the participant relocates into or out of Milwaukee County or between BOS W-2 agencies. When a participant informs the W-2 agency of his or her relocation, the FEP must close the CMF placement and end the W-2 episode. If the participant is interested in continuing case management services he or she will need to apply at the new W-2 agency and meet eligibility requirements for a CMU placement. If the participant loses his or her employment, he or she may re-apply for W-2 and might be eligible for services at the W-2 agency in the contract area where the participant has relocated. (See attached sections 4.6.1)

There is no change to policy when a participant in a CMF placement relocates from one contract area to another in Milwaukee County. The participant may remain with the W-2 agency they are currently working with as long as they remain in Milwaukee County. Refer to W-2 Manual, Sections 4.6.1 and 4.6.2 and DCF Operations Memos [12-65](#) and [13-09](#) for information about transfer policies and CARES and CWW processing for other placement types.

CWW Change:

Updates to CWW now treat CMF placements like all other placement types if the participant relocates into or out of Milwaukee County or between BOS agencies. The system will no longer allow FEPs to complete CMF transfers without first ending the placement and the W-2 episode. Per the change to W-2 Manual section 4.6.1 outlined above, if the participant is interested in continuing case management services he or she will need to apply at the new W-2 agency and meet eligibility requirements for a CMU placement.

CARES

These policy and systems changes will be effective beginning June 25, 2016, when BWF will move the case-based eligibility functionality from the CARES mainframe to CWW, including functionality related to changes identified in this memo.

ACTION NEEDED

As discussed at the W-2 Contractors' meetings, in preparation for the CARES functionality changes effective June 25, 2016, and the related policy changes identified in this memo, W-2 agencies must ensure that all CMF participants have had eligibility reviews within the last six months. Between now and June 25, if a CMF case closes during the review due to being over income or assets, the agency may override the closure. During that same time, W-2 agencies must not override CMF cases that fail to meet nonfinancial eligibility requirements. FEPs must close these cases and should follow current case closure procedures. ([W-2 Manual 7.2.5](#) and [11.4.2](#))

TRAINING

The Partner Training Section is currently scheduling in-person classroom trainings June 13-17 and June 20-24, 2016. At that time, training materials and desk aids related to the systems changes detailed above will be available. For more information, please contact your Agency Training Liaison.

ATTACHMENTS

[W-2 Manual 2.9.2.4 Employment During Up-front Job Search](#)

[W-2 Manual 3.1 General Financial Eligibility](#)

[W-2 Manual 4.6.1 Relocation into or out of Milwaukee County or Between Balance of State W-2 Agencies](#)

[W-2 Manual 7.2.2 Case Management Underemployed](#)

[W-2 Manual 7.2.3 Case Management Follow-up, with the addition of 7.2.3.4 CMF Eligibility Requirements](#)

[W-2 Manual 7.2.4.8 Ending CMJ Placements](#)

[W-2 Manual 7.2.5 Denying or Terminating an Unsubsidized Employment Case Management Placement](#)

[W-2 Manual 17.2.2 Eligibility Determination Process](#)

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/JC