

DEPARTMENT OF CHILDREN  
AND FAMILIES  
Secretary Eloise Anderson  
201 East Washington Avenue, Room G200  
P.O. Box 8916  
Madison, WI 53708-8916  
Telephone: 608-422-7000  
Fax: 608-266-6836  
www.dcf.wisconsin.gov



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

<b>BWF OPERATIONS MEMO</b>					
No:	17-11				
DATE:	04/25/2017				
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: *Supervision Requirement for Wisconsin Works Education and Training Activities***

**CROSS REFERENCE:** [Documentation, Verification, and Supervision Chart](#)  
[Q & A: Counting and Verifying Hours of Work Participation](#)

**EFFECTIVE DATE:** Immediately

### **PURPOSE**

The purpose of this Operations Memo is to provide revisions to the supervision criteria outlined in the [Documentation, Verification, and Supervision Chart](#) for Wisconsin Works (W-2) education and training activities. The revisions will assist agencies with meeting the federal Temporary Assistance for Needy Families (TANF) Work Participation Rate (WPR) supervision requirements.

### **BACKGROUND**

The Federal TANF Regulations require 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. W-2 agencies have informed the Bureau of Working Families (BWF) that it is difficult to obtain supervision signatures for certain W-2 activities, even though there is documentation that the participant completed the activity and the W-2 agency is able to verify progress in the activity with the participant. [Recent guidance](#) from the federal Administration for Children and Families allows for a broader definition of supervision than is currently outlined in policy. Therefore, BWF is revising the [Documentation, Verification, and Supervision Chart](#) to allow for modified supervision criteria when the participant is assigned activities that are listed under the definition of education and training activities.

The following list shows the federal category and relevant W-2 activities that are impacted by the changes in supervision criteria:

- Federal category *Education Directly Related to Employment*:
  - ✓ Adult Basic Education (BE);
  - ✓ English-as-a-Second-Language (EL); and
  - ✓ Literacy Skills (LS).
- Federal category *Satisfactory Attendance at Secondary School*:
  - ✓ General Educational Development (GE); and
  - ✓ High School Equivalency Diploma (HE).
- Federal category *Vocational Educational Training*:
  - ✓ Job Skills Training (JS);
  - ✓ Technical College Activities (TC);
  - ✓ Technical College Study Time (TT);
  - ✓ Vocational Adult Basic Education (VA);
  - ✓ Vocational English-as-a-Second-Language (VE); and
  - ✓ Vocational Literacy Skills (VL).

## ***SUPERVISION CRITERIA***

Current Supervision Criteria: An education and training instructor must supervise the activity. In the event that some of the work is home-based, participants should have assigned to them a liaison at the education/training center that will provide supervision. In the event of monitored study time, the study time would be monitored either by the instructor or other authorized staff person, e.g. W-2 agency staff, etc.

New Supervision Criteria: For classroom time, an education and training instructor must supervise the activity. For education and training programs completed through distance learning and for study time that is completed in a home-based or community-based setting, the Financial and Employment Planner (FEP) has three options to ensure that work is completed and that the supervision requirement is met.

- Option 1:** An instructor or other authorized staff person, e.g. W-2 agency staff, resource room monitors, library staff, etc., who is monitoring the activity may sign supporting documentation as the supervisor of the activity.
- Option 2:** An educational liaison may discuss progress with the participant and sign supporting documentation as the supervisor.
- Option 3:** A FEP who is in ongoing contact with the participant and has adequate evidence that the participant is making satisfactory progress may sign supporting documentation as the supervisor. The documentation must support that:
- a. The FEP and participant are in regular communication by phone, in person, or electronically in order to discuss attendance, along with such issues as progress, needs for supportive services, and career planning; **and**
  - b. The participant is making satisfactory progress in the educational activity.

If the FEP is providing supervision for an educational activity, and the participant fails to demonstrate satisfactory progress at the end of the instructional period (e.g. quarter, semester, final test), the participant will need to complete education and training activities in the presence of a supervisor, e.g. instructor, educational liaison, W-2 agency staff member.

This policy only applies to the W-2 activities listed under the three federal categories described previously. Participants engaged in a distance learning/online education program must track the date of the online activity, the education/training provider, the start time and end time of the activity, the daily actual hours, and the activities completed during that time (e.g. classroom time, quizzes or tests, studying, etc.) through either an electronic printout that provides the information or through individual activity logs.

**Example:** Jeannie is preparing to take her GED exam. Jeannie's FEP assigns her 10 hours per week of GE to prepare for the test. Jeannie completes individual activity logs for the time she is in the classroom, which her instructor signs. She also completes activity logs for the time she studies at the library, including the date she studied, her start time and end time, the total amount of hours she was at the library, and what she completed while she was there. Jeannie's FEP discusses with Jeannie how she used her study time and the progress she made during that time, and signs as the supervisor. Finally, the FEP adds the documentation to the ECF.

### **CARES/CARES WORKER WEB (CWW)**

There are no changes to CARES or CWW.

### **AGENCY ACTION**

W-2 agencies must ensure that FEPs are aware of these policy updates. The [Documentation, Verification, and Supervision Chart](#) has been updated to reflect this policy change. Training has been evaluated and updated to be consistent with this change. To view current trainings available on documentation, verification, and supervision requirements, visit the [PTT Learning Center](#).

**ATTACHMENT**     [Documentation, Verification, and Supervision Chart](#)

### **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/ERR