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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
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BWF OPERATIONS MEMO

No: 17-16

DATE: 08/04/2017

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

SUBJECT: Wisconsin Works Time Limits – Policy Updates and Changes

CROSS REFERENCE: [W-2 Manual Chapters 1, 2, 6, & 7](#)
[Operations Memo 17-15: Modernization of CARES Mainframe Time Limits Screens](#)
[Operations Memo 17-17: Federal Months of Assistance for Wisconsin Works](#)

EFFECTIVE DATE: August 5, 2017

PURPOSE

The purpose of this Operations Memo is to communicate:

1. New policy related to Wisconsin Works (W-2) time limits;
2. Clarifications and changes to the W-2 time limit policies; and
3. Updates to the W-2 Agency Time Limit Extension Record form.

BACKGROUND

2015 Wisconsin Act 55 reduces the W-2 lifetime eligibility time limit from 60 to 48 months and conforms language surrounding availability of extensions to federal law. Implementation of the changes in 2015 Act 55 will correspond with the promulgation of the administrative rules and require significant modifications to current W-2 time limit policies and related practices. The overarching goal is to encourage rapid transition to employment that enables W-2 program participants to support their families and achieve independence from government assistance.

The Bureau of Working Families (BWF) has planned a phased approach to the W-2 48-month lifetime limit.

The first phase of implementation includes clarifications and updates to existing time limit policies outlined in this memo and the modernization of the CARES Work Program Subsystem time limit management screens. Please see [Operations Memo 17-17: Federal Months of Assistance for Wisconsin Works](#) for additional information on counting months toward the federal 60-month lifetime limit as well as [Operations Memo 17-15: Modernization of CARES Mainframe Time Limit Screens](#) for information on the new web-based application that agencies will use to manage participants' W-2 time limits.

TIME LIMIT POLICY

The W-2 Time Limits policy updates and policy clarifications implemented to support the first phase of the implementation are summarized below. The W-2 Manual sections are attached with all policy changes incorporated. Underlined text will be added, while text with strikeouts will be deleted.

- **Note:** When the concept of time limited cash assistance was introduced under Temporary Assistance for Needy Families (TANF), Wisconsin chose to refer to this as time limit “clocks” and this reference was incorporated into all policy and mainframe automation. While the concept of time limited cash assistance has not changed, BWF is no longer referring to W-2 and TANF months of eligibility as “clocks” and months used as “ticks.” With the updates to the time limits policies, BWF decided it was more accurate to refer to time limits in the W-2 Manual in terms of “months used” rather than “ticks,” as well as to identify the specific time limit referenced, as opposed to “clocks.” BWF updated references to time limits to specify the relevant placement or lifetime limit (e.g., Community Service Job [CSJ] time limit, federal 60-month time limit, or state 60-month time limit).

STATE 60-MONTH LIFETIME LIMIT

Current Policy

The W-2 policy manual details which months in the Aid to Families with Dependent Children (AFDC) JOBS program from October 1, 1996 to W-2 implementation count toward the state 60-month lifetime limit.

Manual Update

There is no change to current policy on AFDC months from October 1, 1996 to W-2 implementation in September 1997 that count toward the 60-month lifetime limit. The detail regarding the AFDC months has been moved to a new manual appendix. The [AFDC Appendix](#) highlights the primary differences between AFDC and W-2, including information on time limits.

See attached [updated W-2 Manual Section 2.10.2](#) and [W-2 Manual AFDC Appendix](#).

WISCONSIN WORKS GROUP LIMIT

Current Policy

The lifetime limit applies to the W-2 group.

Policy Clarification

The 60-month state lifetime limit applies to all adults in the W-2 Group. Any month during which any adult in the W-2 Group participates in a W-2 employment position counts toward the individual's 60-month state lifetime limit for both the parent in the placement and the non-placed parent. This includes second parents, stepparents, adult SSI/SSDI recipients, and nonmarital co-parents.

[See attached updated W-2 Manual Section 2.10.2.1.](#)

TANF RECEIVED IN ANOTHER STATE

Current Policy

When there is evidence that an applicant has received TANF cash assistance in another state, the Financial and Employment Planner (FEP) must enter the months and years that the TANF was received in the other state. There is no current policy requirement to record additional details on TANF months from other states on the time limits page.

New Policy

There is no change to the policy requiring that the FEP enter the months and years the TANF assistance was received. In the details field on the Time Limit Tracking application Edit Month screen, the FEP must indicate the date verified and any other relevant information to ensure the time limits pages contain a complete record of the participant's time limits history and months used.

[See attached updated W-2 Manual Section 2.10.2.3.](#)

24-MONTH EMPLOYMENT POSITION TIME LIMIT

Current Policy

Even if the individual's W-2 payment is reduced, the month counts toward the 24-month time limit.

Policy Clarification

If the individual's payment is reduced, even to \$0, the month in the placement still counts toward the 24-month placement time limit.

[See attached updated W-2 Manual Section 2.10.3.](#)

MOVING BETWEEN W-2 EMPLOYMENT POSITIONS

Current Policy

When a participant moves between employment positions during the calendar month, the 24-month time limit is determined by the employment position placement on the last day of the month. If the W-2 placement on the last day of the month is not a Trial Employment Match Program (TEMP), CSJ, or Wisconsin Works Transition (W-2 T), the month will still count toward the appropriate 24-month time limit if the individual participated even one day during that month in a TEMP, CSJ or W-2 T.

Policy Clarification

The 24-month placement time limit type is determined by the W-2 placement on the last business day of the month. If that placement is not a TEMP, CSJ, or W-2 T, the month will still count toward the appropriate 24-month placement time limit if the individual participated even one day during that month in any employment position.

[See attached updated W-2 Manual Section 2.10.3.](#)

TIME LIMIT NOTIFICATIONS TO PARTICIPANTS

Current Policy

W-2 applicants and participants must be made aware that W-2 employment position payments are time-limited. At a minimum, the FEP must go over the participant's time limit status at every review and at each new placement.

Policy Clarification

FEPs must create a sense of urgency and finality surrounding time limits by ensuring frequent communication about time limits with each participant. Conversations must promote full engagement in work activities and motivate the participant to develop skills that will allow them to enter the local labor market as quickly as possible. At a minimum, the FEP must go over the participant's time limit status at every eligibility review, Employability Plan (EP) review, and when assigning each new paid placement type.

[See attached updated W-2 Manual Section 2.10.4.](#)

SUBTRACTING MONTHS OF ELIGIBILITY

Current Policy

The FEP must adjust the individual's time limit by subtracting a month if a participant voluntarily returns a CSJ or W-2 T payment within 15 days of the payment issuance date. There is no policy for subtracting months of eligibility when a W-2 payment is returned to the agency due to an undeliverable address.

Policy Change

The FEP must adjust the individual's time limit by subtracting the entire month of participation if a participant voluntarily returns the full amount of CSJ or W-2 T payment within one year of the payment issuance date.

New Policy

The FEP must adjust the individual's time limit by subtracting the entire month of participation if a W-2 payment is returned to the agency due to an undeliverable address and the participant does not pick up the check within 30 days.

[See attached updated W-2 Manual Section 2.10.5.](#)

60-MONTH TIME LIMIT EXTENSION CRITERIA

Current Policy

A W-2 agency may extend the 60-month lifetime limit if the W-2 agency determines that the participant is unable to work due to a personal disability or incapacitation.

Policy Clarification

A W-2 agency may extend the 60-month state lifetime limit if the W-2 agency determines that the participant is unable to work due to a personal disability or incapacitation which prevents the person from temporarily or permanently obtaining or maintaining full-time unsubsidized employment or advancing to a higher W-2 employment position.

[See attached updated W-2 Manual Section 2.10.6.2.](#)

VERIFICATION OF A FAMILY PROBLEM

Current Policy

A valid formal assessment must have been completed for determining whether the participant has family problems that affect one of the members of the W-2 Group including legal problems, family crises, homelessness, domestic abuse, or children's school or medical activities.

Policy Change

A valid formal assessment is no longer required for the agency to determine that the participant meets the 60-month time limit extension criteria for family problems. In order to approve a 60-month state lifetime limit extension for presence of family problems, the agency must have valid documentation. The W-2 agency may accept a valid formal assessment or alternative documentation of family problems if the information is valid and reflects current circumstances.

[See attached updated W-2 Manual Section 2.10.6.2.](#)

LOCAL LABOR MARKET CONDITIONS CRITERIA

Current Policy

In order to deny a time limit extension based on local labor market conditions, the W-2 agency must demonstrate or document three types of information relating to the participant's ability to obtain employment.

Policy Change

There is no longer policy providing criteria for denying a time limit extension based on local labor market conditions.

- **Note:** There is no change to the local labor market time limit extension *approvals* policy. In order to approve a time limit extension based on local labor market conditions, the agency must demonstrate or document current local job market conditions preventing the participant from finding employment.

[See attached updated W-2 Manual Section 2.10.6.3.](#)

LENGTH OF TIME LIMIT EXTENSIONS

Current Policy

A time limit extension may be granted for up to 6 months from the last day of the participant's 24th month and 12 months from the last day of the participant's 60th month.

Policy Change

A time limit extension may be granted for 6 months either from the last day of the participant's 24th month time limit or from the last day of the participant's state lifetime 60th month time limit.

[See attached updated W-2 Manual Section 2.10.6.4.1.](#)

TIMING THE PROCESSING OF SUBSEQUENT TIME LIMIT EXTENSIONS

Current Policy

There is no policy on when the discussion between the FEP and the participant regarding a subsequent time limit extension must take place.

New Policy

A discussion regarding subsequent extensions must occur no later than the third month of the extension.

[See attached updated W-2 Manual Section 2.10.6.4.2.](#)

CASE MANAGEMENT OF PARTICIPANTS IN AN APPROVED TIME LIMIT EXTENSION

Current Policy

There is no policy providing guidelines and best practices for case management specific to individuals who have been approved for a time limit extension.

New Policy

New policy has been added to provide guidelines for case management for individuals who have been approved for a time limit extension including frequent review of the EP, the need for accommodations, and the Supportive Service Plan.

[See attached W-2 Manual Section 2.10.6.5.2 \(New Section\).](#)

CUSTODIAL PARENT OF AN INFANT (CMC) TIME LIMIT

Current Policy

The W-2 Manual provides when a CMC participant's months in a CMC placement count toward both the 24-month and 60-month time limits. There is no policy providing when a CMC participant's months in a CMC placement count toward the federal lifetime limit.

Policy Clarification

The CMC policy has been rewritten to clarify when CMC placement months count toward the state 60-month lifetime limit and 24-month placement time limit.

- **Note:** There is no change to the CMC participant time limit extension policy language.

New Policy

CMC placement months count toward the 60-month federal lifetime limit only when there is a W-2 T or CSJ placement immediately preceding the CMC placement. Please see [Operations Memo 17-17: Federal Months of Assistance for Wisconsin Works](#) for additional policy details about counting federal months for the CMC placement.

[See attached updated W-2 Manual Section 2.10.8.](#)

FEDERAL 60-MONTH TIME LIMIT

Current Policy

The W-2 Manual does not specify all instances when months count toward the federal lifetime limit.

New Policy

Section 2.10.9 is created to provide specific instruction on counting federal time limit months and to capture all federal time limit policy in a single W-2 manual section. Please see [Operations Memo 17-17: Federal Months of Assistance for Wisconsin Works](#) for additional policy details about counting federal months and specific instruction for non-placed parents, participants in the CMC placement, and common scenarios related to benefit issuance.

[See attached W-2 Manual Section 2.10.9 \(New Section\).](#)

CASE MANAGEMENT POLICY AND TIME LIMITS

The updates to W-2 case management policies emphasize the importance of planning for a reduced state time limit and encouraging rapid exit to employment. The W-2 Time Limit Case Management policy updates and policy clarifications are summarized below. The W-2 manual sections are attached with all policy changes incorporated. Underlined text will be added, while text with strikeouts will be deleted.

PRIMARY FUNCTIONS OF THE RESOURCE SPECIALIST

Current Policy

The Resource Specialist will gather information about potential barriers to engagement in employment.

New Policy

The Resource Specialist will gather information about potential barriers to engagement in work activities as well as employment to promote a sense of urgency with respect to full engagement in activities.

[See attached updated W-2 Manual Section 1.2.2](#)

RESPONSIBILITIES OF THE FEP

Current Policy

The FEP performs functions related to eligibility determination, assessment, employability planning, service referral, and ongoing case management.

Policy Clarification

In order to reflect the renewed sense of urgency surrounding case management practices necessary to ensure individuals obtain employment as quickly as possible and within the time limit of the program, FEP responsibilities include updates specific to time limits. FEPs must emphasize the importance of full engagement immediately upon program entry and stress that program activity planning must take into account the time the participant has remaining in the W-2 program. FEPs must also engage in key discussions about time limit policies with participants and communicate placement and program time limits as firm deadlines.

[See attached updated W-2 Manual Section 1.2.3](#)

PROGRAM EMPLOYMENT GOALS

Current Policy

The Primary and Secondary Employment Goals identified as part of the EP should be based on the applicant's or participant's strengths, skills, work styles, interests, and needs; what can realistically be achieved through participation in the W-2 program; and industry and employment opportunities in the local labor market.

New Policy

The Primary and Secondary Employment Goals must also be based on the length of time remaining in the W-2 program to ensure the identification of realistic goals. This will help participants in employment positions to successfully exit as quickly as possible and prior to reaching the time limit.

[See attached updated W-2 Manual Sections 6.1 and 6.1.1](#)

FREQUENCY OF THE EP REVIEW

Current Policy

The EP must be reviewed at least once every six months and may occur more frequently as needed.

New Policy

More frequent EP reviews are particularly encouraged when a participant is nearing a time limit.

[See attached updated W-2 Manual Section 6.2.2.](#)

W-2 SUPPORTIVE SERVICE PLAN POLICY

Current Policy

The W-2 agency must offer assistance in developing a Supportive Service Plan with applicants who withdraw their W-2 applications prior to W-2 placement and participants in a case management placement.

New Policy

The W-2 agency must also offer assistance in developing a Supportive Service Plan with participants approved for a time limit extension to ensure a more comprehensive transition plan for participants, especially those in need of alternative sources of support.

[See attached updated W-2 Manual Section 7.6.1.](#)

NEW FORMS

The W-2 Agency Time Limit Extension Record (11661) form is obsolete and replaced with two new forms, one specific to documenting an extension approval, and the other specific to documenting an extension denial:

- [W-2 Agency Time Limit Extension Approval Record \(DCF-F-5214\)](#); and
- [W-2 Agency Time Limit Extension Denial Record \(DCF-F-5215\)](#).

Updates to the current forms reflect the time limit policy changes described above and remove information and text relevant to the CARES mainframe. The Participant Acknowledgements section of the [W-2 Agency Time Limit Extension Approval Record \(DCF-F-5214\)](#) is new and intended to reinforce critical messaging surrounding the finality of time limits and communicate that program extensions are not automatic.

W-2 TIME LIMIT TRACKING APPLICATION

BWF is modernizing the work program mainframe functionalities to a new web-based system, Wisconsin Work Programs (WWP). The Time Limit Tracking application is introduced in [Operations Memo 17-15: Modernization of CARES Mainframe Time Limits Screens](#). The new Time Limit Tracking application replaces the CARES mainframe time limit screens with web-based pages for agencies to use to manage participants' time limits and extensions.

TRAINING

The Partner Training Team (PTT) developed training on the time limits policy changes and clarifications as well as how to use the new time limits pages. PTT created a webcast recording to describe the W-2 Time Limit Tracking Policy and Automation.

The following resources will be added to the [PTT Learning Center](#) by the effective date of this memo:

- W-2 Time Limits Policy and Automation Webcast;
- Entering an Extension Desk Aid;
- Extension Details Desk Aid; and
- Editing a Month Desk Aid.

AGENCY ACTION

W-2 agencies must discuss the policy changes and new forms with staff and update any relevant local agency procedures.

ATTACHMENTS

[W-2 Agency Time Limit Extension Approval Record \(DCF-F-5214\)](#)

[W-2 Agency Time Limit Extension Denial Record \(DCF-F-5215\)](#)

[W-2 Manual, Section 2.10 Time Limits](#)

[W-2 Manual, Section 1.2.2 Resource Specialist](#)

[W-2 Manual, Section 1.2.3 Financial and Employment Planner \(FEP\)](#)

[W-2 Manual, Section 6.1 Employability Plan Overview](#)

[W-2 Manual, Section 6.1.1 Parts of the Employability Plan](#)

[W-2 Manual, Section 6.2.2 Employability Plan Review](#)

[W-2 Manual, Section 7.6.1 W-2 Supportive Service Plan](#)

[W-2 Manual Appendix – AFDC Appendix](#)

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/LMW