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2.10.1 Introduction to Time Limits

Time limits stress mutual responsibility: the W-2 program provides services designed to promote employment while participants are expected to prepare for and enter employment. The purpose of the time limits and case management practices encouraging immediate engagement is to ensure participants make progress as quickly as possible towards work in unsubsidized employment. W-2 eligibility has a state lifetime limit of 60 months. Participation in a W-2 subsidized employment position (TEMP, CSJ, and W-2 T) is limited to 24 months. ~~Time limits stress mutual responsibility: government provides services designed to promote employment while participants are expected to prepare for and enter employment in return. The goal of W-2 participation is to raise participants' employment rates and earnings and reduce reliance on government programs.~~

2.10.2 State 60-~~m~~Month Lifetime Limit

[2.10.2.1 W-2 Group Limit](#)

[2.10.2.2 Native American Exemptions](#)

[2.10.2.3 TANF Received in Another State](#)

[2.10.2.3.1 TANF Received in Another State and Time Limit Extensions](#)

The state 60-month state lifetime limit is the cumulative total of the number of months the individual or any adult member of the individual's *W-2 Group* has participated in, or has received benefits under, any of the following or any combination of the following:

1. A ~~TEMP, CSJ, or W-2 T~~ W-2 Employment Position at any time during a month, including TEMP, CSJ, or W-2 T, even if the payment was reduced to \$0.
2. Any TANF funded program in this state or any other state for which the participant received TANF cash assistance while in that program (see [2.10.2.3](#)). This includes Tribal TANF funds and some months in a CMC placement (see [2.10.8](#)).
3. The AFDC JOBS program from October 1, 1996, to W-2 implementation ~~that had been in September 1997. See the AFDC Appendix for specific guidelines.~~
 - ~~included in the SFU in an open AFDC assistance group (includes sanctioned adults);~~
 - ~~age 18 or older;~~
 - ~~coded with a JOBS registration code of mandatory (M), voluntary (V), or PFR Demonstration with a code of (P) or (R); and~~
 - ~~enrolled in JOBS under experimental or non-experimental PFP, WNW, Experimental or Control PFR.~~

2.10.2.1 W-2 Group Limit

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 towards 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 non-marital co-parents. Some of these parents are exempt from counting towards the 60-month federal lifetime limit. (See 2.10.9) In W-2 Groups with more than one adult member, the adult member with the greatest number of months accumulated counts toward the W-2 Group's state 60-month lifetime limit.

Individuals entering a W-2 Group raise the W-2 Group's cumulative number of months, if the new member has accumulated more months than the primary individual.

Individuals leaving a W-2 Group take with them the number of months accumulated prior to entering the W-2 Group as well as the number of months accumulated while a part of the W-2 Group.

Example 1: Mary is in a W-2 Group consisting of herself and her 4 year old daughter. She has accumulated 30 months towards her 60-month state lifetime limit. Because she is the only adult in the W-2 Group, the W-2 Group is credited with 30 months toward the 60-month state lifetime limit. John, Mary's estranged husband, joins the W-2 Group. John has accumulated 35 months toward his 60-month state lifetime limit prior to moving back in with Mary. Because John has the greater number of months accumulated towards the state lifetime limit, the W-2 Group is now credited with 35 months towards the state lifetime limit.

Example 2: After ten months, John moves out of the home and the W-2 Group once again consists of Mary and her daughter. John and Mary divorce. At the time John left the W-2 Group, he and Mary had ~~accumulated~~ used an additional 10 months (35 + 10) towards the 60-month state lifetime limit reaching a total of 45 months (35 + 10). Because Mary had 30 months accumulated toward the 60-month state lifetime limit when John moved in and she accumulated 10 more months during the time she and John lived together, the W-2 Group of Mary and her daughter is credited with 40 months towards the state lifetime limit. John has accumulated 45 months towards the state lifetime limit.

Dependent 18-year-olds are considered to be children in the W-2 Group and are not subject to time limits. Once a dependent 18-year-old turns 19 or graduates from school, the individual becomes an **Excluded Adult** and is no longer included in the W-2 Group. If the dependent 18-year-old has a ~~D~~ dependent C child and applies for services independent of his or her parents, she or he would then be eligible for W-2 with the dependent child as their own W-2 Group and subject to the 60-month state lifetime limit.

2.10.2.2 Native American Exemptions

Any adult in the W-2 Group is exempt from the 60-month state lifetime limit while living in a federally recognized American Indian reservation, an Alaskan Native village, or an Indian country occupied by an Indian tribe for a month, if during that month the following applied:

1. At least 1,000 individuals were living on the reservation or in the village or Indian country; and
2. At least 50 percent of the adults were unemployed.

2.10.2.3 TANF Received in Another State

~~TANF cash assistance is limited to 60 months in an individual's lifetime. This means that TANF assistance received by an adult in this state or any other state counts toward the 60-month time limit.~~ In Wisconsin, TANF months accumulated in other states also count towards the 60-month state lifetime limit.

When there is evidence that an applicant or participant has received TANF cash assistance in another state, the *FEP* must:

1. Determine the number of months TANF cash assistance was received in the other state by contacting the appropriate persons. The TANF verification contact directory contacts for TANF verification can be found at: <https://www.dhs.wisconsin.gov/em/public-assistance.pdf>. Only months of TANF cash assistance received after September 1, 1996 can be counted. If the contact cannot confirm that the assistance received in the other state was TANF, do not use the information. The months of TANF cash assistance received in the other state does not have to be verified in writing.
2. Enter the month and years that the TANF was received in the other state ~~on~~ in the Time Limit Tracking application as OTF-Benefits from Another State CARES screen AWO. In the details field, the FEP must indicate the date verified and any other relevant information.

Example: Annabelle moves to Wisconsin from Illinois and applies for W-2. When the FEP contacts Illinois, the case worker confirms that Annabelle received TANF benefits for 24 months in Illinois. If Annabelle is found eligible for W-2, Annabelle will start in W-2 with 24 months accumulated towards her Wisconsin 60-month state lifetime limit.

2.10.2.3.1 TANF Received in Another State and Time Limit Extensions

If an individual who has received more than 60 months of TANF assistance in another state is eligible for W-2, but has used 60 months on his or her lifetime limit, the *FEP* *must* determine time limit extension eligibility for a state lifetime limit extension based on the time limit extension criteria at application.

When applying the time limit extension criteria, the *FEP* must use information obtained during the W-2 informal assessment. In addition, the *FEP* must attempt to contact the other state for more specific information about the applicant. If the *FEP* is unable to obtain additional information, the information gathered through the informal assessment must be used to determine time limit extension eligibility.

(See [2.10.6](#) for more information on time limit extensions.)

2.10.3 24-Month Employment Position Time Limits

[2.10.3.1 Restoring 24-Month Time Limits](#)

Participation in a **TEMP**, **CSJ**, or **W-2 T** employment position is limited to 24 cumulative months. Each placement-employment position has its own 24-month placement time limit and, therefore, a participant has 24 months in each of the placement types. ~~Even if~~ the individual's payment is reduced, even to \$0, the month in the placement still counts toward the 24-month placement time limit. There are also times when a participant is in a CMC placement and the month(s) counts toward a 24-month placement time limit. (See [2.10.8](#))

~~When a participant moves between employment positions during the calendar month, t~~ The 24-month placement time limit is determined by the employment position placement on the last business day of the month. If the W-2 placement on the last business day of the month is not a TEMP, CSJ, or W-2 T, the month-most recent employment position placement will determine the 24-month placement time limit. The month will still count toward the appropriate 24-month placement time limit if the individual participated even one day during that month in a TEMP, CSJ, or W-2 T.

Example 1: John is placed in a CSJ on January 1. On January 28, John is placed in a W-2 T placement and remains in the placement through the end of the month. ~~On January 31, when the CARES clock cycle runs, T~~ the month of January will count toward John's W-2 T 24-month placement time limit because that was John's last placement in the month that is subject to a 24-month placement time limit. January will not count toward John's CSJ 24-month placement time limit.

Example 2: ~~John-Rebecca~~ is placed in a CSJ placement on ~~January 4~~ April 1. On ~~January 28~~ April 4, Rebecca finds unsubsidized employment and is placed in a **CMF** placement and remains in that placement through the end of the month. ~~Because John was in a CSJ that same month, on January 31 when the CARES clock cycle runs, T~~ the month of January-April will count toward Rebecca's CSJ 24-month placement time limit because Rebecca participated at least one day in April in a placement that is subject to a 24-month placement time limit.

Example 3: ~~John-Lucy~~ is placed in a CSJ on ~~January 1~~ June 2. On ~~January 8~~ June 29, Lucy loses W-2 eligibility and her case closes. ~~Because John was in a CSJ that same month, on June 30 when the CARES clock cycle runs, T~~ the month of June will count toward Lucy's CSJ 24-month placement time limit because Lucy participated at least one day in June in a placement that is subject to a 24-month placement time limit.

2.10.3.1 Restoring 24-Month Time Limits

The 2009-2011 Biennial Budget (Wisconsin Act 28) eliminated the 24-month placement time limit for Trial Jobs, CSJ, and W-2 T, employment positions and, in some instances, CMC employment positions placements effective October 30, 2009.

The 2011-2013 Biennial Budget (Wisconsin Act 32) restored the 24-month placement time limit for Trial Jobs, CSJ, W-2 T, placements and, in some instances, CMC placements effective

January 1, 2012. The restored language is the same language that was eliminated under Wisconsin Act 28.

For a 26-month time period (November 2009 through December 2011), there were no 24-month placement time limits. However, while the 24-month placement time limit was eliminated during this time period, the Department of Children and Families continued to count months that participants accumulated in these W-2 employment positions for both federal and state time limits (as applicable) in CARES and displays this count on CARES screen AIWC in the Time Limit Tracking application under the category of NO24.

~~Beginning on January 1, 2012, CARES screen AIWC was updated to include only the months in a Trial Job, CSJ, and W-2 T which counted toward the 24 month time limit for that placement.~~

2.10.4 Time Limit Notifications to Participants

W-2 applicants and participants must be made aware that W-2 employment position payments are time-limited. FEPs must create a sense of urgency and finality surrounding time limits when communicating this message to participants. Conversations must promote full engagement to increase participants' employability and motivate the participant to develop skills that will allow them to enter the local labor market well before reaching the time limit.

FEPs can reinforce the necessity of meeting employment goals within the time limits of the W-2 program by ensuring frequent communication about time limit status. At a minimum, the FEP must go over the participant's time limit status at every eligibility review, employability plan review, and when assigning a at each new paid placement type. Time limit information is also included on Notices of Eligibility when eligibility reviews are completed.

2.10.5 Subtracting Months of Eligibility

The FEP must adjust the an individual's time limit by subtracting the entire months of participation in on CARES screen AIWC the Time Limit Tracking application in the following situations:

1. If a participant voluntarily returns a the full amount of a CSJ or W-2 T payment within 45 days 1 year of the payment issuance date. The refund can be made in cash, by personal check, money order, or by returning the issued payment. ~~No adjustment will be made.~~ If the voluntarily refunded payment is from a W-2 employment position participant who is sanctioned, see 2.10.9.1 for changing the Federal Indicator in the Time Limit Tracking application.
2. 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.
3. If a participant repays in full payments received from for a month due to an overpayment caused by agency error or inadvertent participant error. When the entire

overpayment is repaid, those months of eligibility must be restored. See 2.10.9 for In cases of IPV, sanctioned participation, or fraud, used months of eligibility must not be restored even if payments are fully repaid.

4. If a **TEMP** employer does not request a TEMP subsidy for a month of employment.

There are times when a month of participation will count towards an individual's 60-month state lifetime limit and 24-month placement time limit, but the FEP must adjust the federal indicator so the month does not count towards the federal lifetime limit. (See 2.10.9.1 for changing the Federal Indicator in the Time Limit Tracking application).

See [2.10.2.3](#) for adding months of eligibility when **TANF** is received from another state.

2.10.6 Time Limit Extensions

[2.10.6.1 24-Month Time Limit Extension Criteria](#)

[2.10.6.2 State 60-Month Time Limit Extension Criteria](#)

[2.10.6.3 Local Labor Market Conditions Criteria](#)

[2.10.6.4 Time Limit Extension Decision Process](#)

[2.10.6.4.1 Processing Initial Time Limit Extensions](#)

[2.10.6.4.2 Processing Subsequent Time Limit Extensions](#)

[2.10.6.4.3 Reaching 24-month and 60-month Time Limits Concurrently](#)

[2.10.6.5 Time Limit Extension Decisions and Assessment](#)

[2.10.6.5.1 CMD Placements](#)

[2.10.6.5.2 Case Management Practices and Time Limit Extension Approvals](#)

There ~~are~~ may be opportunities for time limit extensions of the 24-month placement time limits and 60-month state lifetime limits for **TEMP**, **CSJ**, **W-2 T**, and **CMC** participants. The **W-2** agencies must work intensively with **CSJ** and **W-2 T** participants prior to and during time limit extension periods to help the participant overcome barriers or challenges.

For information on time limit extensions for CMC participants, see [2.10.8.1](#).

For the purposes of this section:

"Reasonable unsubsidized employment opportunity" means a job the participant could get that pays at least minimum wage, and conforms to all applicable federal and state laws.

Making "all appropriate efforts to find unsubsidized employment" means that the participant has participated in all assigned activities.

2.10.6.1 24-Month Time Limit Extension Criteria

All time limit extension decisions must be made on a case-by-case basis. In determining whether to extend the 24-month placement time limit, the W-2 agency must determine whether the participant meets the appropriate 24-month time limit extension criteria.

TEMP Participants: A TEMP participant may be granted a 24-month time limit extension if he or she:

- Has made all appropriate efforts to find unsubsidized employment; and
- Has been unable to do so because the local labor market conditions preclude a reasonable unsubsidized employment opportunity for that participant.

NOTE: Since subsidized employment positions in TEMP specifically target high quality, high wage opportunities, the likelihood of extending a TEMP placement should be extremely rare.

CSJ Participants: A ~~TEMP~~ or CSJ participant ~~must~~ may be granted a 24-month time limit extension if he or she:

- Has made all appropriate efforts to find unsubsidized employment; and
- Has been unable to do so because the local labor market conditions preclude a reasonable unsubsidized employment opportunity for that participant and, for ~~CSJ participants, the same reason,~~ there are no TEMP opportunities available ~~in the specified labor market.~~

See [2.10.6.3](#) for documentation required to approve a 24-month placement time limit extension for local labor market conditions.

W-2 T Participants: A W-2 T participant ~~must~~ may be granted a 24-month time limit extension if he or she:

- Has made all appropriate efforts to find unsubsidized employment; and
- Significant barriers prevent advancement to a higher W-2 employment position or unsubsidized employment.

To be considered for a 24-month placement time limit extension, the W-2 T participant must have completed a valid formal assessment. (See [5.5](#) for more information on valid formal assessments.)

2.10.6.2 State 60-Month Time Limit Extension Criteria

All time limit extension decisions must be made on a case-by-case basis. In determining whether to extend the 60-month state lifetime limit, the W-2 agency must determine whether the participant meets at least one of the following 60-month state lifetime limit extension criteria:

1. The participant has made all appropriate efforts to find unsubsidized employment and has been unable to do so because the local labor market conditions preclude a reasonable unsubsidized employment opportunity for that participant.
2. The participant is unable to work because of: A **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.
Examples include: physical, mental health, and cognitive limitations, learning disabilities, domestic abuse, and substance abuse.
3. The participant is unable to work because of A **a** need to remain at home to care for a member of the W-2 Group whose incapacity is so severe that without in-home care provided by the W-2 participant, the incapacitated W-2 Group member's health and well-being would be significantly affected.
4. The participant has significant limitations to employment such as ~~any of the following~~ low achievement ability, learning disability, or emotional problems of such severity that they prevent the individual from obtaining or retaining unsubsidized employment, but are not sufficient to meet SSDI or SSI requirements.
5. The participant has significant limitations to employment such as F 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.

See [2.10.6.3](#) for documentation required to approve a 60-month state lifetime limit extension for criteria 1. A valid formal assessment must have been completed to approve a 60-month state lifetime limit extension for criteria 2, 3, and 4 above. In order to approve a 60-month state lifetime limit extension for criteria 5, the agency must have valid documentation.

Valid documentation for criteria 5 must reflect current circumstances. This includes:

- Court, medical, criminal, child protective services, social services, psychological, school social worker, school guidance counselor or law enforcement records regarding legal problems, family crisis, homelessness, children's school or medical activities, or domestic abuse or physical or emotional harm to the parent or child;
- Voluntary disclosure or identification by the BST that the applicant/participant or group member has been a victim of domestic abuse or is at further risk of domestic abuse;
- Written and signed statements from others with knowledge of the circumstances on which the family problems hardship claim is based, including, but not limited to, statements from public or private social services agencies providing services to the W-2 group, school counselors, domestic violence or homeless shelter service providers, attorneys, etc.;
- Written statement by the applicant/participant; or
- Any other supporting or corroborative documentation, including formal assessments (See [5.5](#) for more information on valid formal assessments).

If the individual does not have ~~formal assessment information regarding barriers or limitations as described above and a verified barrier, limitation, or family problem as required above~~ or is not participating in all assigned activities, the FEP may deny a 60-month state lifetime limit extension. (See 5.5.1 for more information on valid formal assessments.)

2.10.6.3 Local Labor Market Conditions Criteria

A W-2 agency may provide a 24-month placement time limit extension or a 60-month state lifetime limit extension on a case-by-case basis if that agency determines that a participant's appropriate efforts to find unsubsidized employment have been unsuccessful because local labor market conditions preclude such employment for that participant.

Local Labor Market Time Limit Extension Approvals

In order to approve a time limit extension based on local labor market conditions, the agency must demonstrate or document any one of the following circumstances:

- As supported by specific examples, the inability of other W-2 participants with similar skills, or engaged in job searches in similar geographic and occupational areas, to find unsubsidized jobs;
- As supported by specific examples, the loss, due to employer closures or cutbacks, of sites on which the agency has historically relied to place W-2 participants in unsubsidized employment;
- As supported by published labor market data or by specific examples of closures or cutbacks, a local downturn or continuing unavailability of jobs in the labor market sectors matching participant skills; or
- As supported by published labor market data or by specific examples of closures or cutbacks, a local downturn or continuing unavailability of jobs in the labor market within reasonable participant travel time (no more than 60 minutes travel time one-way, using available transportation, from the participant's home to the employer, including travel time related to any necessary child care).

This documentation may include case histories of other comparable participants (with any personally identifiable information removed), press coverage regarding the local job market or local business conditions, agency correspondence with historical or potential placement sites, current labor market data obtained from public or private sources, or products of current locally relevant labor market studies or research.

If the agency approves an extension based on local labor market conditions, FEPs should conduct assessments, including career assessments, with the participant and create an EP with assigned activities that focuses on training to build skills demanded by the local labor market.

Local Labor Market Time Limit Extension Denials

~~In order to deny a time limit extension based on local labor market conditions, the agency must demonstrate or document all three of the following types of information:~~

1. ~~Detail on the skills and aptitudes the participant has to offer the local labor market, and detail on the occupations in which the agency believes the participant can get a job.~~
2. ~~Documentation of at least two specific job opportunities compatible with the participant's skills, aptitudes, and personal circumstances, for which the participant has refused or failed to apply.~~
3. ~~Descriptions of the participant's means of access to the identified job opportunities, showing that each opportunity is no more than 60 minutes travel time one-way, using available transportation, from the participant's home to the employer (including travel time related to any necessary child care).~~

2.10.6.4 Time Limit Extension Decision Process

W-2 agencies have decision-making authority for all time limit extension approvals and denials.

2.10.6.4.1 Processing Initial Time Limit Extensions

A discussion between the FEP and the participant regarding a time limit extension must take place no later than the 18th month of the 24-month placement time limit and the 54th month of the 60-month state lifetime limit. If a person enters W-2 with more than 18 months on a 24-month time limit or 54 months on the 60-month state lifetime limit, the discussion must take place at application. When determining eligibility for an initial time limit extension, the FEP must complete the [W-2 Agency Time Limit Extension Record \(11661\)](#), [W-2 Agency Time Limit Extension Approval Record \(XXXXX\)](#) or [Denial Record \(XXXXXX\)](#) form that corresponds with the decision. One copy of the form must be scanned into ECF and one copy given to the participant. In addition, the FEP must enter the time limit extension decision on in CARES screen AIWE the Time Limit Tracking application no later than the end of the 20th month for the 24-month placement time limit and the end of the 56th month for the 60-month state lifetime limit, unless the application is received after the 20th month or 56th month respectively. A time limit extension may be granted for up to 6 months from the first last day of following the participant's 24th month and 42-6 months from the last first day of following the participant's 60th month.

For those participants who have been denied or who have declined a time limit extension, the FEP must continue to work with the participant in the period of time before his or her W-2 case closes ~~closely monitor the case in the final months~~ to determine if circumstances have changed that would result in the need for a time limit extension.

2.10.6.4.2 Processing Subsequent Time Limit Extensions

After an initial 24-month placement time limit or 60-month state lifetime limit extension approval is granted, the W-2 agency can determine that a subsequent time limit extension period is necessary. There is no limit to the number of subsequent time limit extensions a participant may receive. A discussion regarding subsequent extensions must occur no later than the third month of the extension. When determining eligibility for a subsequent time limit extension, the FEP must complete the [W-2 Agency Time Limit Extension Record \(11661\)](#), [W-2 Agency Time Limit Extension Approval Record \(XXXXX\)](#) or [W-2 Agency Time Limit Extension Denial Record \(XXXXXX\)](#) form that corresponds with the decision. One copy of the form must be scanned into

ECF and one copy given to the participant. The subsequent time limit extension decision must also be entered on ~~CARES screen AWE~~ in the Time Limit Tracking application no later than the month prior to the current time limit extension end month.

If the agency approves a subsequent extension, activity assignment should reflect assessment results, local labor market information, and anticipated time to work readiness or referral to other programs.

2.10.6.4.3 Reaching 24-month and 60-month Time Limits Concurrently

If a participant is going to reach his or her 24th month in a TEMP, CSJ, or W-2 T, or the end of a 24-month placement time limit extension, 6 months prior to reaching the 60-month lifetime limit, the FEP must determine eligibility for a 60-month state lifetime limit extension rather than a 24-month placement time limit extension. The FEP must then enter the 60-month state lifetime limit extension information into ~~CARES-~~ the Time Limit Tracking application prior to the end of the participant's 24th month or the end of a 24-month placement time limit extension.

Example: Mary will reach her 24th month in a CSJ ~~when the CARES clock cycle runs on July 29.~~ Upon reviewing the participant's time limit history in preparation for the time limit discussion with the participant, the FEP sees that the participant will reach her 60th month on her state lifetime limit on October 31. Because the participant will reach 60 months 3 months after reaching her 24th month, the FEP determines eligibility for a 60-month state lifetime limit extension and enters the 60-month state lifetime limit extension approval by July 29. This extends both the 24-month placement time limit as well as the 60-month state lifetime limit. Any subsequent time limit extensions will be made to the 60-month state lifetime limit.

2.10.6.5 Time Limit Extension Decisions and Assessment

[2.10.6.5.1 CMD Placements](#)

[2.10.6.5.2 Case Management Practices and Time Limit Extension Approvals](#)

The FEP must offer the BST if an initial 24-month placement time limit or 60-month state lifetime limit extension is going to be denied and the BST has not been completed or declined within 12 calendar months prior to the participant's 24th or 60th month. The FEP cannot deny a time limit extension until the BST is offered to the participant using the [W-2 Barrier Screening Tool Agreement Form \(DCF-F-DWSP13578\)](#). A check of CARES screen WPRU will assist the FEP in determining the last date the BST was completed, declined, or updated.

If the BST results indicate the need for a formal assessment, a time limit extension cannot be denied until the formal assessment is complete. (See [5.4.1](#))

Example: Jonna moved to Wisconsin with 46 months on her TANF clock from Illinois. She was placed in W-2 T in March 2011. The BST was administered during the application process in March 2011. Jonna left W-2 in May 2011. She returned to W-2 in December 2011 but the W-2 agency was not required to offer the BST because her case had not been closed for a period of one year or more. Jonna will reach her 60th month in October 2012. In Jonna's 54th month,

which is April 2012, the FEP must have a discussion with Jonna regarding the opportunities for a time limit extension. At that time, the FEP sees that Jonna has not had the BST offered in over 12 months (since March 2011) when she first became eligible for W-2. If the FEP is considering denying a time limit extension for Jonna, the FEP must again offer the BST.

2.10.6.5.1 CMD Placements (Formerly 2.10.6.6)

When a participant is denied a time limit extension or the participant declines a time limit extension for either the 24 month placement time limit or 60 month state lifetime limit, the FEP must offer the CMD placement. The CMD placement is a case management placement for individuals who have reached their time limit and are no longer eligible for a paid placement.

The goals of the CMD placement are to:

- Help connect the individual to employment;
- Connect the individual and family to services in the community; and
- Reassess on a monthly basis whether the individual should receive a time limit extension.

To be eligible for the CMD placement, the participant must meet W-2 financial and nonfinancial eligibility criteria, with the exception of exceeding the 24-month placement time limit or 60-month state lifetime limit.

Services provided to a CMD participant will depend largely upon the reason for the time limit extension denial or the reason the participant declined a time limit extension and the placement the individual was in at the time of the denial or the time the participant declined a time limit extension. Participants who were denied a time limit extension due to nonparticipation would likely be reassessed to determine assigned to activities activity assignments that best match the participant's needs and encourage increased participation similar to what was assigned while in the W-2 employment position placement.

FEPs must meet with CMD participants weekly. Every 30 days, the FEP must review the CMD placement. The placement review must be held in a face-to-face meeting with the participant, either at the W-2 agency or some other agreed upon location. At this meeting, the FEP must reassess the case. If the individual has consistently participated, the FEP must reassess whether barriers to employment exist. The FEP must also reconsider whether the individual is appropriate for a time limit extension.

The FEP must thoroughly document on CARES screen CMCC the details of the weekly meetings and the reassessment process as well as the reason(s) the participant is going to remain in the CMD placement, if that is the FEP's decision.

2.10.6.5.2 Case Management Practices and Time Limit Extension Approvals (New Section)

When a participant is approved for a 24-month placement time limit or 60-month state lifetime limit extension, the FEP must continue to review the participant's goals as part of ongoing case management and reinforce the necessity of meeting employment goals within the time limits of the W-2 program. This includes:

- Reviewing the EP with the participant frequently to ensure activities are meaningful to the participant's goals and the participant is making progress in assigned activities;
- Reviewing relevant labor market data to confirm that employment goals are in line with the job opportunities available in the local labor market;
- Continuing to conduct informal assessment to determine whether potential barriers to employment exist and referring to formal assessment as appropriate (see 5.2.1);
- Reviewing whether the participant needs accommodations and has the tools and resources needed to complete activities (see 1.3.3); and
- Reviewing the Supportive Service Plan to ensure the participant has access to other benefits and services that will support them as they work towards their employment goals and also provide a plan for addressing needs following program exit.

2.10.7 Reapplying for W-2 Services after Reaching the Time Limit

The W-2 agency must process a W-2 application for anyone that requests W-2 services. This includes individuals who have previously reached their 24-month placement time limit or 60-month state lifetime limit. ~~More specifically, it includes:~~

- ~~1. Individuals who voluntarily declined a time limit extension but later decide they want W-2 services.~~
- ~~2. Individuals who previously did not qualify for a time limit extension who left the W-2 program but choose to return at a later time. They may choose to return for many reasons, including but not limited to:
 - ~~○ A change in physical or mental health;~~
 - ~~○ Unable to find employment;~~
 - ~~○ Agrees to cooperate with program requirements; or~~
 - ~~○ Has barriers that were never identified or were not addressed during prior W-2 participation.~~~~

If the applicant meets W-2 financial and nonfinancial eligibility criteria and needs as determined by the informal assessment but has reached the 24-month placement time limit or 60-month state lifetime limit, the FEP must determine eligibility for a time limit extension based on the time

limit extension criteria at reapplication. When applying the time limit extension criteria, the FEP must consider the applicant's prior W-2 participation and current circumstances. If the FEP determines that the applicant does not meet the time limit extension criteria and plans to deny a time limit extension, the FEP must ensure that during previous W-2 participation the individual was properly screened and assessed. Also, the FEP must make sure that accommodations and services necessary to address the participant's barriers were provided.

For all applicants who have reached either a 24-month placement time limit or 60-month state lifetime limit, the FEP must offer the BST during the application process. (See [5.4.1.1](#)) If the BST cannot be completed during the 12 day application process and the applicant is otherwise eligible through informal assessment, the FEP must determine the best placement type to assign the applicant must be placed and offered a time limit extension to that allows for the processing of the BST, as well as any necessary formal assessments needed to support the time limit extension decision. ~~In these circumstances, W-2 agencies should consider a shorter time limit extension than the 6 month maximum time limit extension.~~

2.10.8 CMC Time Limits **(Complete Revision)**

[2.10.8.1 CMC Participant Time Limit Extensions](#)

The CMC placement is for eligible parents with newborns. (See [7.4.5](#)) Whether an individual's time in a CMC placement counts against a 24-month placement time limit or the 60-month state lifetime limit is determined by when the individual was first determined eligible for AFDC or a TEMP, CSJ, or W-2 T placement. The 60-month federal lifetime limit is determined by whether the payment received while in the CMC placement is considered ongoing cash assistance.

60-Month Federal Lifetime Limit:

CMC placement months count toward the 60-month federal lifetime limit ONLY when the payment is considered ongoing cash assistance. The CMC payment is considered ongoing cash assistance when there is a W-2 T or CSJ placement immediately preceding the CMC placement.

CMC placement months do NOT count toward the federal lifetime limit when:

- There is a gap after any previous W-2 paid employment position placement (CSJ or W-2 T) or there is no previous W-2 T or CSJ placement.
- The individual moves to the CMC placement directly from a W-2 case management, TEMP, or ARP placement.

Example 1: Lanye was in a W-2 T placement for nine months and had a baby. She is moved directly into the CMC placement. Because she moved directly from a W-2 T placement to a CMC placement, the CMC months will count against the 60-month federal lifetime limit. Since Lanye had the baby less than 10 months after she was first determined eligible for the W-2 T placement, the CMC months will not count towards her 60-month state lifetime limit.

Example 2: Renee has never received W-2 or AFDC in the past. Renee applied for W-2 and was placed in an ARP placement. When Renee had her baby, she moved to a CMC placement. Because Renee has never been determined eligible for AFDC or a TEMP, CSJ, or W-2 T placement, the CMC months will not count toward the 60-month federal lifetime limit.

60-Month State Lifetime Limit:

CMC placement months count toward the 60-month state lifetime limit ONLY if the child is born more than 10 months (304 days) after the date the individual is first determined eligible for AFDC or a TEMP, CSJ, or W-2 T placement. The 304 day period must be counted from the first employment position placement begin date.

CMC placement months do NOT count toward the 60-month state lifetime limit when:

- The CMC participant's child is born less than 10 months from the date the individual was first determined eligible for AFDC or a TEMP, CSJ, or W-2 T placement;
- Eligibility was determined prior to October 1, 1996; or
- The birth was the result of sexual assault or incest and the incest or sexual assault has been reported to a physician and law enforcement authorities.

Example 1: Rochelle has been in a W-2 T placement for the past 24 months and had a baby. She is moved directly into the CMC placement. Because it has been more than 10 months since she was first found eligible for the W-2 T placement, the CMC months will count against the 60-month state lifetime limit.

Example 2: Julie, a former W-2 participant, has a child, applies for W-2, and is found eligible for CMC. She was first determined eligible for a CSJ in March 2008. Therefore, the months in CMC will count against the 60-month state lifetime limit because her baby was born more than 10 months after she was determined eligible for a CSJ.

24-Month Placement Time Limit:

CMC placement months count toward a 24-month placement time limit ONLY if the child is born more than 10 months (304 days) after the date the individual is first determined eligible for AFDC or a TEMP, CSJ, or W-2 T placement AND the participant moved directly into a CMC from a TEMP, W-2 T, or CSJ placement. The 304 day period must be counted from the first employment position placement begin date.

Months will count against the 24-month placement time limit of the employment position placement from which he or she moved. The participant will be in a CMC placement, but the 24-month placement time limit months used will reflect their previous employment position.

Example 1: Matilda has been in a CSJ placement for the past 24 months and had a baby. She is moved directly from the CSJ placement to the CMC placement. Because she moved directly

from a paid employment position placement to a CMC placement, the CMC months will count against the CSJ 24-month placement time limit.

Example 2: Latashia was in a CSJ placement from April 2013 to December 2015, when she left the W-2 program. She applies for W-2 in March 2017 and is placed directly in a CMC placement. Because she did not move from a TEMP, W-2 T, or CSJ placement to the CMC placement, the CMC months will not count against a 24-month placement time limit.

2.10.8.1 CMC Participant Time Limit Extensions

CMC participants are automatically eligible for 24-month and 60-month time limit extensions. The FEP must enter a time limit extension covering the time until the child turns 8 weeks of age. The FEP must then review the CMC case prior to the end of the 8 week CMC time period to determine if the CMC participant wants and is eligible for continued W-2 services. If the person wants cash assistance or other W-2 services beyond when the child turns 8 weeks of age, the FEP would have to follow normal eligibility determination policies, including time limit extension eligibility, if necessary.

2.10.9 Federal 60-Month Lifetime Limit (New Section)

[2.10.9.1 Changing the Federal Indicator](#)

Per federal law, states cannot provide federal [TANF](#) cash assistance to most families for more than 60 months. Wisconsin has established a 60-month lifetime limit, but there are differences in how state lifetime limit months and federal months of assistance are counted. Months that count towards the 60-month state lifetime limit do not always count toward the 60-month federal lifetime limit. It is also possible for a month to count toward the federal lifetime limit, but not the state lifetime limit because of the requirements for months in a CMC placement (See [2.10.8](#)).

Only months of assistance that are paid for with Federal TANF funds (in whole or in part) count toward the federal lifetime limit (See [19.2.3](#)). A month counts towards the 60-month federal lifetime limit if:

1. The individual receives an actual payment of \$1 or more through participation in a [CSJ](#) or [W-2 T](#) placement (See [2.10.2.1](#));
 - Months where the full payment was sanctioned to \$0 prior to W-2 pulldown do not count towards the 60-month federal lifetime limit.
 - Months where a delayed payment is received count towards the month for which there was participation.
2. The individual receives a [CMC](#) payment and a W-2 T or CSJ placement immediately preceded the CMC placement. (See [2.10.8](#))

- Months do not count toward the 60-month federal lifetime limit if the individual has never before received [AFDC](#) or TANF or did not move directly from a W-2 paid employment position (W-2 T or CSJ).
3. The individual receives transportation assistance while in an unpaid, case management only placement and certain conditions are met. (See [19.2.3](#))
 4. The individual received TANF cash assistance in any other state. (See [2.10.2.3.1](#))
 5. The individual is the other parent in the [W-2 Group](#) and is married to the placed parent who receives an actual CSJ or W-2 T payment of \$1 or more.
- Months do not count toward the 60-month federal lifetime limit if the individual is a non-marital co-parent and is not the placed parent during a month.

The individual is exempt from having months count towards the federal lifetime limit if:

1. The individual is a qualified non-citizen or the placed parent in the W-2 Group is a qualified non-citizen. (See [2.4.2](#)) W-2 payments made to qualified non-citizens are paid through state funds, not federal TANF funds, therefore those months do not count towards the federal lifetime limit.
2. The individual is living/lived on a federally recognized American Indian reservation, an Alaskan Native village, or an Indian country occupied by an Indian tribe during a month where at least 50% of the adults were not employed.

Example 1: Judy and Joan are married and have adopted a child, Beth. Judy is participating in a CSJ placement. For every month that Judy receives a payment for her CSJ participation, Joan uses an 'other parent' month that counts toward both the federal and state 60-month lifetime limits.

Example 2: Melissa and Keith are living together and have a child, Lenny. Melissa is in a W-2 T placement. For each month that Melissa receives a payment for her W-2 T participation, Keith will use an 'other parent' month that only counts toward the state 60-month lifetime limit. Because Keith is not married to Melissa, his 'other parent' months do not count towards his federal 60-month lifetime limit.

Example 3: Ahmed and Julienne are married and have a child, Omar. Ahmed is a qualified non-citizen and is participating in a CSJ placement. Julienne is a U.S. citizen. For each month Ahmed participates in a CSJ placement, Julienne uses an 'other parent' month which only counts toward the state 60-month lifetime limit. Because Ahmed is a qualified non-citizen and his CSJ payment is paid through state funds and not TANF funds, these months do not count towards Ahmed or Julienne's federal time limits. If Julienne became the placed parent, those months would count towards her federal time limit, but they would not count towards Ahmed's time limit because he is a qualified non-citizen.

Example 4: Hilda applies for [W-2](#) on May 22. Her FEP places her in a W-2 T starting May 25. Hilda will receive a delayed payment in June for her May participation. In the Time Limit Tracking application, Hilda will use a W-2 T month for May and the month used will count

toward both the state and federal 60-month lifetime limits based on her participation from May 25 to May 31.

2.10.9.1 Changing the Federal Indicator

The number of months for which an individual receives a TANF payment must equal the number of federal months used. When there is a discrepancy between payments received and federal lifetime months, the FEP (or the FEP's supervisor) must adjust the individual's 60-month federal time limit by changing the Federal Indicator for the month of participation in the Time Limit Tracking application. In the **Edit Month** dialogue box within the Time Limit Tracking application, the Federal Indicator should be changed from "Yes" to "No" in the following situations:

1. A W-2 employment position participant voluntarily returns in full a payment which was sanctioned due to nonparticipation.
2. A participant repays in full an overpayment for W-2 payments he or she should not have received due to [IPV](#), sanctioned participation that was not entered timely by the W-2 agency, or fraud.
3. A system error in the Time Limit Tracking application causes an individual who meets the exemptions listed above to incorrectly use a month of their 60-month federal lifetime limit.

By changing the Federal Indicator, the month will still count towards an individual's state and placement limit as necessary, but will not count towards the federal 60-month lifetime limit. For information on subtracting entire months of eligibility, see [2.10.5](#).

1.2.2 Resource Specialist

All [W-2](#) agencies must have a staff person who performs the role of a [RS](#). That staff person may perform other functions within the agency as well. The role of the RS is to understand the applicant's needs and assist applicants in determining which programs or services are likely to support their efforts to find and maintain employment.

In fulfilling this role, the RS will perform these primary functions:

1. Understand the applicant's situation and perform the initial review of need for employment-related services. ~~This will include~~ The RS will:
 - a. ~~Asking~~ the applicant what brought them into the office today.
 - b. ~~Asking~~ the applicant what they need to find and/or keep a job.
 - c. ~~Gathering~~ information through the [CARES](#) Work Program Assessment Driver Flow about the applicant's recent job search efforts, employment skills, work history, education, and potential barriers to employment or participation in work activities.
 - d. ~~Determining~~ Determine how the household composition and circumstances affect the applicant's ability to work or participate in work activities.
 - e. ~~Identifying~~ whether the applicant is in a crisis situation (e.g., homeless, victim of domestic violence, no food in the house, etc.) and the potential need for an Emergency Payment. (See [19.1](#)) ~~Giving~~ Give the applicant a copy of the [Domestic Violence Brochure \(2614\)](#). (See [1.4.6](#))
 - f. ~~Identifying~~ the need for any necessary accommodations to help the applicant complete the application process.
 - g. ~~Assessing~~ current child support case status and ~~informing~~ the applicant of the child support pass through policy for individuals in a paid W-2 placement. (See [15.1.1](#))
2. Inform each applicant about the services available and assist the applicant in determining what programs and services are likely to support the efforts at employment. The RS will: ~~including:~~
 - a. ~~Explaining~~ the services that are available through the W-2 program including employment position placements, individualized case management services, and supportive services. The RS must tell the applicant about the W-2 eligibility criteria and that eligible parents must be willing to participate in exchange for W-2 ~~benefits~~ payments. The RS must also explain the W-2 24-month placement and 60-month state lifetime limits (See [2.10](#)).
 - b. ~~Explaining~~ the Job Center Partner programs/other workforce development programs such as [DVR](#), [UI](#), [FSET](#), [WIOA](#), and other employment programs and resources available through the Job Center of Wisconsin and within the community.
 - c. ~~Explaining~~ the supportive service programs such as [FS](#), Wisconsin Medicaid and BadgerCare Plus, Wisconsin Shares Child Care Subsidy Program, [EA](#), the [WIC](#) benefit, [WHEAP](#), and local housing assistance programs.

- d. Explaining community resources including those required through the [CSN](#).
- e. Explaining the services available through the local [CAP](#) agency.

The RS must refer the applicant to any programs in which the applicant has indicated an interest.

No change to remainder of 1.2.2

1.2.3 Financial and Employment Planner (FEP)

State statute requires that each [W-2](#) agency have at least one [FEP](#).

The FEP must provide individualized case management services and supportive services for participants in W-2 employment positions. Although a FEP may have other staff assistance, the FEP is the primary case manager and has the ultimate responsibility for the case, including correct eligibility determination for W-2. The FEP must also coordinate with other agencies to facilitate needed services such as treatment, education, training, [educational assessment](#), [career assessment](#), [vocational evaluation/assessment](#), and other formal assessments.

The FEP must meet with the applicant within five working days after the date the W-2 agency receives a signed Application Registration form. (See [1.4.2.1](#)) The FEP has up to seven working days after this first meeting to make a placement determination. The FEP uses the information gathered to determine eligibility and placement.

The main functions of the FEP are:

- Eligibility determination;
- Assessment;
- Employability planning;
- Service referral; and
- Ongoing case management.

Responsibilities that are part of these functions include:

1. Determining eligibility for W-2 and [JALs](#), including verifying information necessary to process the W-2 application, scanning verification timely into [ECF](#), ensuring that all data is entered into [CWW](#), and [CARES](#), and the [Time Limit Tracking application](#) accurately and timely, and ensuring that correct payments are issued in a timely manner.
2. Providing information on basic money management, personal work habits, and life skills needed to succeed in the working world.

3. Completing an informal assessment (see [5.2.1](#)), assessing for both strengths and barriers, including reviewing and updating information gathered by the [RS](#) using the CARES Work Program Assessment Driver Flow.
4. Using the [BST](#), educational needs assessment, and other information provided by the participant to determine whether a formal assessment by a qualified assessing agency is needed. (See [5.5.2](#)) Considering barriers to employment in determining the level of employability, making placement decisions, and referrals to other services. Providing accommodations and modifications as needed to support full engagement in work activities or employment. (See [1.3.1](#))
5. ~~When appropriate, A~~ Assigning reasonable job search activities prior to and after the determination of W-2 eligibility.
6. Determining placement in a W-2 employment position and the need for an Emergency Payment. (See [19.1](#))
7. Working with participants to develop a W-2 [EP](#) based on participants' goals and assessment results, including an [educational needs assessments](#), and [career assessments](#). Designing a plan to move the participant to unsubsidized employment as quickly as possible and within the time limits of the W-2 program. Documenting requirements for assigned W-2 activities and incorporating Learnfare activity requirements as necessary. (See [Chapter 6](#))
8. Ensuring that applicants and participants have the necessary supportive services, accommodations, auxiliary aids and communication assistance required to participate to the fullest extent possible upon program entry.
9. Assessing participants' progress in their assigned activities and determining whether participants are developing the hard and soft skills they need to obtain and retain unsubsidized employment as quickly as possible after application. Working with the participants to update the EP as needed based on the assessment progress and number of months of eligibility remaining.
10. Identifying noncompliance, determining good cause, applying payment reductions, and recording participant progress in CARES.
11. Interpreting and explaining policies governing eligibility, including explaining the responsibilities and requirements outlined in the [Participation Agreement \(PA\)](#) and securing the applicant's signature on the PA prior to beginning a W-2 employment position. These policies include, but are not limited to: a) explaining that failure to cooperate during the application phase may result in ineligibility; b) providing information on the Fact Finding Process; and c) emphasizing that W-2 is a time-limited program (see [2.10](#)) and ed) explaining the W-2 agency's discrimination complaint process. (See [1.4.6](#))
12. Referring applicants who supply questionable information for front-end verification. (See [13.2.3](#))
13. Referring participants suspected of fraudulent activity for fraud investigation. (See [13.3.2](#))
14. When necessary, referring applicants and participants to other community services such as food pantries, domestic abuse services, homeless shelters, literacy councils, child welfare agencies, [DVR](#), and [AODA](#)/mental health services.

15. Assuring that final eligibility information for W-2 is transmitted to the child support agency, and assuring that participants cooperate with their child support agency. During eligibility reviews, the FEP must also review with the participant his or her child support assignment.
16. Explaining Learnfare, assessing Learnfare status for dependent children in a W-2 Group, and providing or arranging for Learnfare case management. Ensuring enrollment and attendance for dependent child(ren) subject to Learnfare requirements ~~is promoted, verified, monitored, and appropriately entered in CARES.~~ (See [Chapter 16](#))
17. Providing follow-up case management services for ~~at least~~ 12 months to participants who progress from a W-2 employment position to an unsubsidized position to encourage and support job retention and advancement. At local agency discretion, the participant may continue to receive the follow-up case management services of the FEP beyond the ~~mandatory~~ 12-month follow-up period ~~as necessary~~. (See [7.2.3](#))
18. Maintaining an effective working relationship with the Job Center partners and other agencies that provide workforce development programs.
19. Explaining the W-2 lifetime limit and placement time limit policies (see [2.10](#)).
Positioning participants to achieve the best outcomes possible within the time limits of the program by providing early access to barrier remediation and employment supports. Stressing time limits as a firm deadline and promoting rapid exit to employment. Communicating the importance of full engagement in activities and careful transition planning to promote independence.
20. Ensuring participants with long-term barriers to work that cannot be addressed within the lifetime limit are referred to alternative programming for services that will meet their individual needs.

No change to remainder of 1.2.3

6.1 Employability Plan Overview

No change prior to third paragraph of 6.1

The EP must be developed using the information gathered through the assessment process. (See [5.1.1](#) and [5.1.2](#)) The worker uses information from the assessment process to build the plan around the applicant's or participant's:

- Strengths, interests and aptitudes, and needs;
- Prior education and work history;
- Strategies to overcome barriers to employment identified through informal and formal assessment; and
- Assignment of work and training activities to achieve the employment goal; and
- Length of time remaining in the W-2 program (See [6.1.1](#)).

No change to remainder of 6.1

6.1.1 Parts of the Employability Plan

The [EP](#) consists of three parts:

Part 1: Program Employment Goals and Related Goals

Program Employment Goals

This section of the EP identifies shorter term employment goals that can be achieved through participation in the [W-2](#) program. The [FEP](#) and the applicant or participant must jointly develop the employment goals. The Primary and Secondary Employment Goals should be based on:

1. The applicant's or participant's strengths, skills, work styles, interests, and needs. Consideration should be given to the individuals' prior work experience, prior education and training, and assessments (e.g., [educational needs assessments](#), [career assessments](#), [vocational evaluation/assessments](#), or other formal assessments).
2. What can realistically be achieved through participation in the W-2 program. Consideration must be given to all types of activities that may enable the applicant or participant to achieve ~~his/her~~ the goal including, but not limited to, job search/job readiness activities, work experience, educational activities, job skills training and technical college participation. ([See W-2 Manual Appendix - Activity Codes](#))
3. Industry and employment opportunities in the local labor market. The FEP must review relevant labor market data to determine if employment goals are in line with the local labor market. [Wisconsin's WORKnet](#) and the Job Centers of Wisconsin are ~~is an excellent~~ resources for labor market information. [Skill Explorer](#) may be used to align participants' skills, interests, and needs with occupations.

4. Length of time remaining in the W-2 program. Immediate engagement in meaningful activities positions participants to achieve the best outcomes possible within the time limits of the W-2 program. If the applicant or participant is nearing a time limit, types of activities must reflect an increased focus on transitioning from the W-2 program.

No changes to remainder of Part 1

Part 2: Personal Goals

The applicant's or participant's personal goals are ~~outside the scope of the program~~ additional steps that are not required for W-2 program participation. They are goals set by the individual that will strengthen ~~his/her~~ the family and empower the individual to achieve ~~his/her~~ their employment goals. Examples of personal goals include:

- Addressing child and family relationship problems;
- ~~Obtaining financial counseling;~~
- Involvement in support groups;
- Moving to a safer neighborhood;
- Weight-loss and exercise regimens; and
- Purchasing a home.

Part 3: Program Activity Plan

The applicant's or participant's program activity plan portion of the EP includes the specific program activities the individual will undertake to achieve the primary employment goal. The full list of activities that may be assigned under W-2 are found in the [W-2 Manual Appendix - Activity Codes](#).

The activity portion of the EP, recorded on [CARES](#) screen WPAS, must include the following detail for each assigned activity:

1. The activity to be completed. The activity must be described in some detail on the EP to ensure that the applicant or participant fully understands what the activity involves.
2. Planned begin and end date.
3. The number of hours per week, the specific days of the week and the specific number of hours on each day that the activity is assigned. The EP in CARES has limited space to record this information. A separate work schedule may be developed to capture the detail and given to the applicant or participant as part of the EP.
4. Provider of service.
5. Address of the site where the activity is located.
6. Supportive services required to complete the activity.
7. The travel time to and from the activity.
- ~~8.~~ Any additional remarks to assist the applicant or participant.

6.2.2 Employability Plan Review

An EP review must be scheduled to occur before the date the EP is set to expire. This will ensure a review is scheduled at least once every 6 months. EP reviews may occur more frequently as needed, particularly if the participant is nearing a time limit.

No change to remainder of 6.2.2

7.6.1 W-2 Supportive Service Plan

The W-2 agency must offer assistance in developing a Supportive Service Plan with:

1. Applicants who withdraw their W-2 applications prior to W-2 placement. In this circumstance, the Supportive Service Plan would generally be developed between the Resource Specialist and the applicant.
2. Participants who are approved or denied a time limit extension.
23. Participants who are placed in a case management placement, including: CMF, CMU, CMD, CMJ, CMN, CMM, CMP, and TSP.

No change to remainder of 7.6.1