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State of Wisconsin  
Governor Tony Evers



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>	
<b>No:</b>	<b>19-10</b>
<b>DATE:</b>	<b>03/26/2019</b>
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<b>W-2</b> <input checked="" type="checkbox"/>	<b>EA</b> <input type="checkbox"/> <b>CF</b> <input type="checkbox"/> <b>JAL</b> <input type="checkbox"/>
<b>RAP</b> <input type="checkbox"/>	<b>TMJ</b> <input type="checkbox"/> <b>TJ</b> <input type="checkbox"/> <b>Other EP</b> <input type="checkbox"/>

SUBJECT: ***Work Programs Automatic Disenrollment - Policy Updates and Changes to CARES and WWP***

**CROSS REFERENCE:** W-2 Manual Sections [2.8.1](#) and [10.2.4](#)  
[Operations Memo 17-23](#)  
[Operations Memo 18-19](#)

**EFFECTIVE DATE:** March 31, 2019

**PURPOSE**

The purpose of this memo is to:

1. Describe policy updates to clarify that Wisconsin Works (W-2) participant placements end when the participant is no longer eligible for W-2;
2. Announce changes to CARES Mainframe and Wisconsin Work Programs (WWP) to automatically disenroll individuals from Work Programs (WP) and end activities when eligibility for W-2 and the W-2 placement automatically end in CARES Worker Web (CWW); and
3. Clarify the Performance Outcome Payments (POP) process because of these changes to CARES.

## **BACKGROUND**

Currently, when a W-2 case closes due to the participant becoming ineligible for W-2, CARES automatically ends the W-2 placement with the date of the last day of the last calendar month that eligibility is open (if the Financial and Employment Planner (FEP) has not ended the placement prior to that date). However, CARES Mainframe permits the WP Subsystem and activities to remain open during the month following the month in which eligibility ends to allow FEPs to enter any nonparticipation.

Allowing WP to remain open past eligibility closure does not align with policy requirements and results in inaccurate data captured in Webl reports that use WP data. Automatically disenrolling individuals from WP ensures that the eligibility end date and the WP end date align and better captures data to reflect participant periods of ineligibility.

## **POLICY UPDATES**

The W-2 policy clarifications are summarized below. Relevant policy manual sections are attached to this memo and will be incorporated into the W-2 Manual upon implementation. Policy that was removed is struck through and policy that was added or moved is underlined. New sections will be clearly denoted.

### CURRENT POLICY

W-2 Manual Section 10.2.4 states that the W-2 agency may terminate a W-2 employment position anytime following a change in circumstance as is reasonable for both the W-2 employer and the W-2 participant. This implies that enrollment in Work Programs occurs independently of W-2 eligibility and gives FEPs discretion to keep a placement open once a participant is ineligible.

### POLICY CLARIFICATION

In accordance with W-2 Manual Section [2.8.1](#) that instructs W-2 agencies to respond to reports of changes affecting eligibility in a timely manner, when a participant reports a change that makes him or her ineligible for W-2, the FEP must act on that information by ending the W-2 placement. Examples in W-2 Policy Manual Section 10.2.4 have been updated to reflect this clarification.

[See attached updated W-2 Manual Section 10.2.4.](#)

## **CARES and WWP CHANGES**

Effective March 31, 2019, CARES and WWP will automatically disenroll an individual from WP at the end of the month if eligibility ends during the month and the FEP has not manually disenrolled the individual. Activities will automatically end on the last day of the last calendar month that eligibility is open in CWW if the FEP has not already manually disenrolled the participant from WP and ended activities prior to this date. FEPs will now be able to enter nonparticipation after the placement ends and the individual is disenrolled from WP, but no other information can be entered once the W-2 placement has ended. These changes will help to ensure timely disenrollment of individuals from WP.

**EXAMPLE 1:** On April 10, Mary reported that she moved to Illinois. She is no longer eligible for W-2 services. Mary's eligibility ends in the system on April 30, 2019. The FEP had failed to end the W-2 placement by April 30, 2019, so CWW automatically closes the W-2 placement with an April 30, 2019 end date. The system will also automatically disenroll Mary from WP and end activities with an April 30, 2019 date. Mary moves back to Wisconsin and re-applies for W-2 on May 15, 2019. This is a new W-2 request and the system will send a new WP referral, ensuring W-2 eligibility and WP dates remain the same.

## **REPORTS**

These CARES Mainframe and WWP changes will result in Webl reports based on WP data that accurately reflect the Work Programs disenrollment date as being no later than the eligibility end date.

## **PERFORMANCE OUTCOME PAYMENTS (POP)**

### PERFORMANCE OUTCOME PAYMENT (POP) CLAIMS PROCESS CLARIFICATION

The W-2 Contractor Payment Structure requires that activities must be open and in Actual phase of a W-2 activity as of one day prior to the Primary Employment Begin Date (PEBD) for agencies to initiate a POP claim. (See Operations Memos [17-23](#) and [18-19](#)) Previously, CARES Mainframe allowed activities to remain open after a participant's eligibility ended to allow the FEP to enter non-participation. Effective March 31, 2019, if a participant that was no longer eligible for W-2 becomes eligible and resumes participation, the FEP must re-open activities in a timely manner for the W-2 agency to meet the requirement for initiating a POP claim that specifies when participants have to be open in an activity.

### EMPLOYMENT-RELATED AND SUPPLEMENTAL SECURITY INCOME/SOCIAL SECURITY DISABILITY INSURANCE (SSI/SSDI) ATTAINMENT POP CLAIMS

1. Since 2013, the W-2 Contractor Payment Structure has required that all individuals be in the Actual phase of a W-2 activity as of one day prior to the PEBD for obtaining employment-related POP claims. CARES Mainframe will do a validation check for the date the FEP enters the activity into the system to see if a W-2 activity is in the actual phase. The system will not allow for the bypass of this requirement if the FEP backdates the activity to one day prior to the PEBD. If the W-2 agency is working with an individual and their eligibility ends, causing the system to automatically end their activities, they will not be eligible for a POP claim if the W-2 agency has not opened an activity in the Actual phase prior to the individual obtaining employment.

**EXAMPLE 1:** Becky's W-2 eligibility ends in CWW and CARES Mainframe automatically ends her activities on May 31, 2019. She reapplied for W-2 on June 3, 2019, and the FEP reopened her eligibility but did not reopen any activities in the Actual phase. On June 5, 2019, Becky calls the W-2 agency to inform them that she obtained employment and started that day. The FEP records the employment and backdates activities starting on June 4, 2019. After 31 days, the W-2 agency attempts to initiate a POP claim. The system prevents the agency from initiating the POP claim because the participant was not open in the Actual phase of an activity as of one day prior to the PEBD.

2. Since 2013, the W-2 Contractor Payment Structure has required that the W-2 agency has provided SSI/SSDI advocacy services for at least 60 days, prior to the date an eligible parent became eligible for SSI/SSDI. To receive SSI/SSDI attainment claims, the FEP must open the SSI/SSDI Advocacy (SD) activity code. CARES Mainframe will allow ending and reopening of the SD activity to count towards the 60-day requirement, as long as the FEP enters the SD activity the first day after the prior SD activity ended. For the 60-day time period to be considered as a single contiguous period, the SD activity must be restarted on the day following the previous SD period's end date. CARES Mainframe will do a validation check for the date the FEP entered the new SD activity into the system. The system will not allow for the bypass of this requirement if the FEP backdates the SD activity to the first day after the prior SD activity ended. It will restart the 60-day time-period.

**EXAMPLE 2:** Jessica has applied for SSI and the FEP opened the SD activity on November 15, 2018. Jessica's eligibility ends and CARES Mainframe auto-closes her SD activity on November 30, 2018. Jessica reapplies for W-2 and the FEP re-opens her eligibility on December 1, 2018. The W-2 agency also re-opens the SD activity on December 1, 2018. Jessica receives her notice of award from the Social Security Administration for SSI on February 1, 2019. The W-2 agency is able to initiate an SSI/SSDI attainment claim for Jessica.

**EXAMPLE 3:** Jessica has applied for SSI and the FEP opened the SD activity on November 15, 2018. Jessica's eligibility ends and CARES Mainframe auto-closes her SD activity on November 30, 2018. Jessica reapplies for W-2 and the FEP re-opens her eligibility on December 7, 2018. The W-2 agency reopens the SD activity on December 11, 2018. Jessica receives her notice of award from the Social Security Administration for SSI on February 7, 2019. The W-2 agency attempts to initiate the SSI/SSDI attainment claim for Jessica and the system prevents the agency from initiating the SSI/SSDI attainment POP claim since the SD activity was open for less than 60 days.

## **TRAINING**

The Partner Training Team (PTT) will update any relevant trainings based on these updates.

## **AGENCY ACTION**

W-2 agencies must familiarize staff with these updates and update any relevant standard operating procedures.

## **ATTACHMENTS**

[W-2 Manual Section 10.2.4 Final Payments](#)

**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 and WWP Functionality Questions: W-2 Help Desk

For Performance Outcome Payment Questions: Jason Bergh

DCF/DFES/BWF/MP & JB