DEPARTMENT OF CHILDREN AND FAMILIES

AND FAMILES
Emilie Amundson, Secretary Designee
201 East Washington Avenue, Room G200
P.O. Box 8916
Madison, WI 53708-8916
Telephone: 608-422-7000
Fax: 608-266-6836
www.dcf.wisconsin.gov





TO:	W-2 Agencies
	Training Staff

FROM: Margaret McMahon, Director Bureau of Working Families

Division of Family and Economic Security Department of Children and Families

BWF OPERATIONS MEMO	
No: 19-16 DATE: 09/12/2019	
W-2 🛛 EA 🗌 CF 🗌 JAL 🗌	
RAP TMJ TJ Other EP	

SUBJECT: Wisconsin Works (W-2) Policy, Reports, and Best Practices for

Refusal to Participate Implementation

CROSS REFERENCE: W-2 Manual Chapters 1, 2, 5, 7, and 11

BWF Operations Memos 18-12 and 19-04

EFFECTIVE DATE: Immediately

PURPOSE

The purpose of this memo is to:

- 1. Review policies and procedures that a W-2 agency must follow when a W-2 participant is not participating in assigned W-2 activities, including taking action timely to update the case with new employment information;
- 2. Provide guidance on consideration of the W-2 placement when a participant is experiencing difficulty attending scheduled activities in the current placement or when a participant did not participate in the placement preceding the current placement;

OM 19-16 Page 2 of 12

3. Introduce a new web intelligence (Webl) report that identifies participants with 20% or more payment reductions who are at risk of case closure for a refusal to participate; and

4. Provide best practices for enhanced case management and successfully engaging participants in W-2 activities.

BACKGROUND

In August 2018, the Bureau of Working Families (BWF) released <u>Operations Memo 18-12:</u> <u>Wisconsin Works Refusal to Participate and Notice before Taking Certain Actions</u> that introduced the refusal to participate policy and provided guidance to W-2 agencies on participant behaviors and actions that demonstrate a refusal to participate.

The refusal to participate policy requires the Financial and Employment Planner (FEP) to close a case when a Trial Employment Match Program (TEMP), Community Service Job (CSJ), or W-2 Transition (W-2 T) participant demonstrates a refusal to participate in the W-2 program without good cause. Prior to closing a case for refusal to participate, the FEP must explore with the participant any potential barriers that may be interfering with his or her ability to participate in W-2 and take steps to address those barriers. In addition, the FEP must provide written notice to the participant that his or her case is at risk of case closure and he or she has seven working days to provide good cause for refusing to participate. If the FEP determines that the participant refused to participate without good cause, the individual is ineligible to participate in the W-2 program for 90 days. (See W-2 Manual Section 11.6)

The full list of refusal to participate reasons can be found in W-2 Manual Section <u>11.6.1</u>. This memo focuses on participants with patterns of nonparticipation without good cause who are at risk of case closure for a refusal to participate; however, W-2 agencies are expected to implement the policies and procedures reviewed in this memo for any of the refusal to participate reasons.

W-2 CASE REVIEWS

In March 2019, Bureau of Regional Operations W-2 Regional Coordinators and Milwaukee Operations Section Regional Administrators conducted reviews of a sample of W-2 cases with a 20% or more payment reduction for two consecutive participation periods, or for three nonconsecutive participation periods in the most recent six months, that are at risk of case closure for refusal to participate.

Regional staff reviewed these W-2 cases for the following actions required by policy:

- 1. Document intervention for nonparticipation. (See W-2 Manual Section 11.1.1.1)
- 2. Explore potential barriers to participation. (See W-2 Manual Section 11.6.2)
- 3. Offer accommodations, if applicable. (See W-2 Manual Section 5.2.1)

From these case reviews, BWF identified potential improvement in the following areas:

 Case management and the responsibility of FEPs to conduct ongoing informal and formal assessments, work with participants who are not participating to uncover barriers preventing their participation, and then take steps to address the barriers that may have caused nonparticipation; and OM 19-16 Page 3 of 12

• Agency procedures pertaining to documentation and verification of employment.

POLICY REVIEW

PARTICIPATION REQUIREMENTS (W-2 MANUAL SECTION 1.4.6)

In order to successfully participate in the W-2 program, W-2 applicants and participants must be made aware of and understand the program requirements. The W-2 Participation Agreement (PA) is a required W-2 application-related form that outlines the conditions and requirements of participation in the W-2 program. The FEP must discuss the program requirements with the applicant and explain that violation of the program rules can end W-2 eligibility and affect future eligibility for W-2. The FEP must discuss with the participant the requirements outlined in the PA at eligibility reviews, employability plan (EP) reviews, and as often as necessary to reinforce the W-2 participation requirements.

REASONABLE ACCOMMODATIONS (W-2 MANUAL SECTION 1.3.3)

To ensure that W-2 applicants and participants are able to participate in all hours of assigned activities, W-2 agencies must provide reasonable accommodations. The FEP must identify the need for accommodations through information gathered from informal and formal assessments. In addition, the FEP must provide the necessary services, modifications, and accommodations that the participant needs to participate based on the results of the assessment.

BWF recently updated the list of examples of accommodations in W-2 Manual Section 1.3.3 that a FEP may arrange. (See Operations Memo 19-04: Implementation of Wisconsin Work Programs System – Updates to W-2 Accommodations Policies) The list is not all-inclusive, and reasonable accommodations may vary depending on the individual's circumstances. On an ongoing basis, the FEP must assess a participant's ability to participate in assigned activities and provide reasonable accommodations as needed based on the results of the assessments.

Nonparticipation in Assigned Activities and Good Cause (W-2 Manual Sections 11.1 and 11.2)

In addition to recording nonparticipation and determining good cause, the FEP must work with participants who are not participating to identify any barriers that might exist and take steps to address those barriers. Nonparticipation and the reasons for good cause may indicate previously undiscovered limitations, disabilities, or changes in the individual's circumstances.

The FEP should review the results of a previously completed informal assessment to determine if barriers identified early on may still be affecting participation. The FEP may choose to complete a new informal assessment when there is reason to believe that reviewing the questions with the participant may help to initiate conversation about a potential barrier to participation. If the FEP suspects that there are additional barriers, the FEP may offer a formal assessment to establish the extent of limitations, disabilities, or other conditions that may interfere with the participant's ability to participate. Based on the results of the informal and

OM 19-16 Page 4 of 12

formal assessments, the FEP should evaluate the placement and assigned activities, and identify and provide resources that will allow the individual to participate.

20% PAYMENT REDUCTIONS (W-2 MANUAL SECTION 11.3)

When nonparticipation without good cause reduces a participant's W-2 payment by 20% or more, CARES will send a notice to the participant that provides a final opportunity to submit good cause for missed activities. The FEP must not wait until CARES provides notice to a participant about a 20% or more payment reduction before initiating a discussion with the participant about missed activities. As part of ongoing case management, the FEP must review the participant's progress in assigned activities and discuss with the participant any underlying causes of nonparticipation.

REPORTING EMPLOYMENT (W-2 MANUAL SECTION 7.2.3.1)

When a participant reports that nonparticipation in assigned activities is due to starting employment, the FEP must make a placement change to Case Management Follow-up (CMF) or CMF Plus (CMF+). While waiting for employment verification, the FEP should obtain the details of the employment from the participant and update the placement with the effective start date of employment. In addition to changing the placement, the FEP should revise the EP and assign case management follow-up activities. By updating the placement and activities, the FEP avoids having to enter nonparticipation for a period when the participant is working and employment verification is pending. If the FEP later receives verification of employment that is different from what the participant reported or that meets the minimum work hours for CMF+, the FEP must update the case accordingly.

REFUSAL TO PARTICIPATE (W-2 MANUAL SECTION 11.6)

When a pattern of nonparticipation without good cause results in a 20% or more payment reduction for two consecutive participation periods, or for three nonconsecutive participation periods in the most recent six months, a participant is at risk of case closure for a refusal to participate. The FEP must not wait until the participant is at risk of case closure for a refusal to participate before exploring potential barriers that may be interfering with the individual's ability to participate and taking steps to address those barriers. W-2 agencies must exercise due diligence in determining whether previously identified or unidentified barriers are the underlying causes of a pattern of nonparticipation.

SANCTIONS AND CASE CLOSURES (W-2 MANUAL CHAPTER 11)

The refusal to participate policy should be used in conjunction with other W-2 sanction policies designed to require, encourage, or assist participants to find employment through their participation in the W-2 program. Closing a case for refusal to participate is a last resort to address nonparticipation and noncompliance with the rules of the W-2 program. The refusal to participate policy does not replace existing W-2 sanction policies.

OM 19-16 Page 5 of 12

Below are examples of how W-2 agencies should apply the refusal to participate policy when participants are not participating in assigned activities.

Example 1: Brie was laid off after working as a welder for several years. Brie applies for W-2 and based on the informal assessment, the FEP determines that Brie does not have any barriers and is capable of finding employment with assistance from the W-2 agency. The FEP assigns Brie to 30 hours per week of employment search, and she fails to complete her assigned activities. The FEP discusses with Brie the reason for missing employment search, determines that activities were assigned appropriately, and determines that she does not have good cause for nonparticipation. The FEP applies hourly payment reductions for the missed employment search and closes Brie's case for noncooperation with W-2 program requirements to search for unsubsidized employment. The FEP does not apply the refusal to participate policy because Brie's pattern of nonparticipation without good cause would not make her case at risk of case closure for refusal to participate.

Example 2: Carson fails to complete activities assigned in his employability plan. The FEP applies hourly payment reductions by entering nonparticipation in CARES. Despite efforts by the FEP to work with Carson to identify causes of nonparticipation, Carson continues to miss assigned activities resulting in a 20% payment reduction for two months in a row. The FEP explores the case for barriers and no barriers are identified. The FEP determines that Carson does not have good cause for the pattern of nonparticipation that makes his case at risk of case closure for a refusal to participate. The FEP closes Carson's case for refusal to participate and he is not eligible to participate in W-2 for 90 days.

Example 3: Letitia has a history of nonparticipation with good cause. The FEP has been working with Letitia to assign activities that align with her skills, interests, abilities, and goals. Letitia informs the FEP that she is no longer interested in participating in W-2. The FEP offers to complete the Supportive Service Plan (SSP) with Letitia and closes her case for decline of W-2 services. Two weeks later, the FEP receives verification that Letitia did not participate in her activities prior to case closure. The FEP enters nonparticipation in CARES and Letitia's W-2 payment is reduced by 20% or more for the third time in the last six months. Because Letitia's W-2 case is now closed, the FEP documents the pattern of nonparticipation and does not apply the refusal to participate policy.

Within 180 days of the previous application for W-2, Letitia reapplies for W-2. The FEP reviews the history of the case and discusses with Letitia the causes of prior nonparticipation. Because the current application is within 180 days of the previous application, the FEP requests good cause for the nonparticipation that occurred prior to Leticia declining services and case closure. Leticia does not provide good cause and the FEP denies W-2 eligibility for noncooperation with the W-2 agency's assistance with finding employment.

DOCUMENTING W-2 PARTICIPANT INFORMATION (W-2 MANUAL SECTION 4.3.)

W-2 policy requires the FEP to document interactions with participants and program-related information within 24 hours of the action or contact. Documentation provides a detailed account of the facts affecting case management decisions. The FEP must document the following:

OM 19-16 Page 6 of 12

WWP Informal Assessment Driver Flow

 Information gathered during the informal assessment in the appropriate Notes and Details sections. (See W-2 Manual Section 5.2.3.5)

 Barriers affecting participation and the accommodations provided in the Participant Barriers and Family Barriers pages. (See W-2 Manual Section <u>5.5.1.2</u>)

CARES Screen CMCC

- General case notes as it relates to work program participation such as EP development and activity assignment. (See W-2 Manual Section 4.3.3)
- Summaries of informal and formal assessment results. (See W-2 Manual Sections 5.2.3.5 and 5.5.1.2)
- Reasons for placement decisions. (W-2 Manual Section 7.1)
- Assistance in developing an SSP. (See W-2 Manual Section 7.6.1)
- Good cause decisions for nonparticipation. (See W-2 Manual Sections <u>11.2.3</u> and <u>11.2.4</u>)
- Actions taken to uncover barriers that may be contributing to nonparticipation. (See W-2 Manual Section <u>11.4.2</u>)

POLICY GUIDANCE

Nonsanctionable Placements

Participants in Custodial Parent of an Infant (CMC) or At-Risk Pregnancy (ARP) placements are not required to participate in W-2 activities, and W-2 payments are not subject to payment reductions for the duration of the CMC or ARP placement. (See W-2 Manual Sections <u>7.4.5</u> and <u>7.4.6</u>)

Policy Guidance

The FEP must not apply the refusal to participate policy when a participant in a CMC placement is identified as at risk of case closure for nonparticipation that occurred in a CSJ or W-2 T placement immediately preceding the CMC placement. The FEP must not close a W-2 case when an individual is otherwise eligible for CMC or ARP and not subject to W-2 participation requirements. The FEP should follow existing policies and procedures and determine if the participant had good cause for nonparticipation that occurred in the CSJ or W-2 T placement preceding CMC.

NONPARTICIPATION IN CSJ AND W-2 T DUE TO EMPLOYMENT

When reviewing a participant's case for potential barriers to participation, the FEP may learn that a participant in CSJ or W-2 T is now working. Participants who begin working may benefit from W-2 case management services that can help them transition to unsubsidized employment, retain employment, and increase their earnings. The FEP should initiate action to document and verify employment and update the case. (See W-2 Manual Section 4.1.3)

OM 19-16 Page 7 of 12

Policy Guidance

The FEP must not apply the refusal to participate policy when a participant in CSJ or W-2 T is identified as at risk of case closure for a refusal to participate for nonparticipation in assigned activities because of employment and W-2 eligibility is pending verification of employment. In addition to verifying employment information with the participant, the FEP should request verification of employment from the employer. The FEP must not penalize the participant if he or she is making a reasonable effort but is unable to produce the information the FEP needs to make an eligibility determination.

Nonparticipation in Proparted CSJ

Participants in prorated CSJ are expected to participate up to 40 hours per week in a combination of hours working in their jobs, work training activities, and education and training activities. (See W-2 Manual Section 7.4.1.4.2) W-2 payment reduction policies apply when a participant in prorated CSJ misses assigned W-2 activities without good cause. Because prorated CSJ payments are less than full CSJ payments, it takes fewer hours of nonparticipation to reduce a prorated CSJ payment by 20% or more. For this reason, the FEP must closely monitor participation in prorated CSJ and determine if a placement change is appropriate.

Policy Guidance

The prorated CSJ placement is for individuals working in unsubsidized employment for less than 30 hours per week, and who have limitations to increasing their work hours or obtaining additional jobs. When a participant in prorated CSJ is at risk of case closure for a refusal to participate for a pattern of nonparticipation without good cause, the FEP must conduct a new informal assessment and determine if a placement change is appropriate based on the participant's employment goals while in W-2 and program time limits. The FEP has three placement options:

1. Move to CMF or CMF+.

If a participant in prorated CSJ does not have employment limitations, the FEP must move the participant to CMF or CMF+ depending on the family type and the number of hours per week in unsubsidized employment.

If a participant has barriers to employment that can be addressed through supportive services in the CMF or CMF+ placement, the FEP must move the participant to CMF or CMF+. While in the CMF or CMF+ placement, the participant is able to receive supportive services to address employment barriers and save months in W-2 that count towards the program limit limits.

2. Continue in Prorated CSJ.

If the FEP determines that prorated CSJ is the most appropriate placement for a participant with employment limitations, the FEP must discuss with the participant his or her employment goals and what can realistically be achieved within the time limits of the W-2

OM 19-16 Page 8 of 12

program. The FEP must emphasize the importance of participating in all assigned W-2 activities, and if nonparticipation without good cause continues, the participant's case is at risk of case closure for a refusal to participate.

Example: Miles is 19 years old and working 15 hours per week at his first job with the local recreation department. Miles does not have his high school diploma, and the FEP assigns 15 hours per week of working, 5 hours per week of employment search, and 20 hours per week of High School Equivalency Diploma (HSED) activities. Miles misses his HSED classes because he is spending time looking for better employment before summer begins. The FEP reduces HSED activities to 10 hours per week and increases employment search to 15 hours per week in addition to Miles working 15 hours per week. Miles continues to miss HSED classes because he is frustrated with the time spent in class when he wants to be out looking for jobs. Although Miles is submitting his employment search logs, they are incomplete and missing information. Miles informs his FEP that he does not want to pursue an HSED anymore and that his goal is to find full-time employment before summer begins. Based on the FEP's discussion with Miles about his current employment and employment goals, the FEP keeps Miles in the prorated CSJ placement and adjusts his activities. The FEP informs Miles that if his nonparticipation becomes a pattern, his case is at risk of case closure for a refusal to participate.

3. Move to W-2 T.

If the FEP determines a participant is marginally employed and has long-term, severe barriers to employment, the FEP must move the participant to W-2 T and refer the participant for a formal assessment.

NONPARTICIPATION IN PRECEDING PLACEMENT

When the FEP learns that a participant has a pattern of nonparticipation and is at risk of case closure for a refusal to participate, the individual may now be in an unpaid placement such as CMF or the W-2 case may now be closed. When this occurs, the FEP must follow existing policies and procedures and determine if the participant had good cause for nonparticipation that occurred in the preceding placement. (See W-2 Manual Section 11.2.3)

Policy Guidance

The FEP must not apply the refusal to participate policy when a participant is identified as at risk of case closure for a refusal to participate and is now in an unpaid placement or the W-2 case is now closed. The FEP must document the nonparticipation that occurred in the preceding placement in CARES case comments. If the individual reapplies for W-2 and the current application is within 180 days of the previous application for W-2 services, the W-2 agency must apply the 180-day policy. If the applicant does not provide good cause for nonparticipation that occurred when the individual previously received W-2 services, the W-2 agency must deny W-2 eligibility for noncooperation with the W-2 agency's assistance with finding employment. (See W-2 Manual Section 2.2.1 #9)

OM 19-16 Page 9 of 12

WEB INTELLIGENCE (WEBI) REPORTS

EXISTING REPORTS

Operations Memo 18-12 referenced a number of Webl reports that W-2 agencies may use at various points of time to track participation. W-2 agencies may use information from these reports to evaluate a participant's placement and assigned activities and to take action to address potential barriers affecting participation early on. A brief description of existing reports is provided below.

<u>RP740TANF – W2 TANF Activities Detail Report (CS1, CS2, CS3, CSJ and W2T)</u> Description: Provides one week of data and only shows activities assigned.

WPR Report 03: Individual Participation Detail by Contract Agency

Description: Available three to four weeks after the participation period and shows activities assigned and nonparticipation for a participation period.

<u>WWP Report 07: W2 Cases with 20% or More Benefit Reduction - 1st of the Month</u> Description: Available in the middle of a participation period and identifies participants on track to receive a 20% or more payment reduction.

<u>WWP Report 08: W2 Cases with 20% or More Benefit Reduction - 16th of the Month</u>

Description: Available at the end of a participation period and identifies participants on track to receive a 20% or more payment reduction.

<u>WWP Report 09: W2 Cases with 20% or More Benefit Reduction - At W-2 Pulldown</u> Description: Available at W-2 Pulldown and identifies participants whose payments will be reduced by 20% or more.

Caseload Report 10: Average Weekly Hours Worked

Description: Available daily and provides data for a calendar month vs. a participation period. Identifies participants with less than 20% payment reduction and can be used to forecast 20% or more payment reduction.

NEW REPORT

BWF developed a new Webl report that W-2 agencies may use to track nonparticipation resulting in patterns of 20% or more payment reductions that would make a W-2 participant's case at risk of case closure for a refusal to participate.

Refusal to Participate Report 01: Participants at Risk of Case Closure with 20% or More Payment Reduction

Description: Identifies participants with a 20% or more payment reduction for two consecutive participation periods, or for three nonconsecutive participation periods in the most recent six months (At Risk) and participants who will develop a pattern of nonparticipation for a refusal to participate (Potential Pattern) if the next W-2 payment is reduced by 20% or more. Additional report documentation can be found in the *Documentation* folder in Webl.

OM 19-16 Page 10 of 12

Under no circumstances should W-2 agencies use Refusal to Participate Report 01 to strictly close cases for a refusal to participate. The intended use for Refusal to Participate Report 01 is as a tool, among other Webl reports, for W-2 agencies to identify participants who are not attending scheduled W-2 activities and to ensure appropriate placement and activity assignment that will allow individuals to participate.

W-2 agencies can use Refusal to Participate Report 01 in implementing W-2 policy requirements in the following ways:

- 1. Determine if 'At Risk' cases should be closed for refusal to participate according to W-2 policy. 'At Risk' cases are participants in W-2 employment positions who meet the pattern of nonparticipation per refusal to participate policy and are at risk of case closure.
- Evaluate 'Potential Pattern' cases and determine if a change in placement or activities is needed to address nonparticipation. Taking steps to address barriers that may have caused nonparticipation can prevent these cases from developing a pattern of 20% or more payment reductions that would make a W-2 participant's case at risk of case closure.
- 3. Identify caseload trends and target resources and services based on the needs of the population. For example, a W-2 agency may identify that more work experience sites are needed to engage CSJ participants with certain accommodations.
- 4. Identify case management trends and coach FEPs to ensure that they are working with participants with sporadic or ongoing nonparticipation and that they are updating cases timely.

BEST PRACTICES

NOTE: The following best practices are for FEPs, Supervisors, and W-2 Agencies for how they conduct W-2 case management. These best practices were developed with input from the DCF Regional staff that conducted reviews of W-2 cases with a pattern of nonparticipation without good cause that are at risk for case closure a for refusal to participate.

MEETINGS WITH PARTICIPANTS

- When meeting with individuals applying for W-2 for the first time, thoroughly review with the
 individual the terms of the Participation Agreement and explain the program requirements.
 Allow the individual to ask questions to ensure that he or she fully understands the program
 requirements, importance of participating in activities, accommodations available, and
 consequences of not participating in all assigned activities.
- During the W-2 intake review, review the history of the case with the participant and discuss
 his or her history of participation. Gather information from the participant about the reasons
 for nonparticipation, barriers affecting his or her participation, and the supportive services

OM 19-16 Page 11 of 12

that he or she needs to participate. Implement this practice with participants transferring from a different W-2 agency or from a different FEP.

• Conduct a review of the case prior to meeting with the participant. Prepare questions to get to know the participant and his or her family, understand his or her goals and interests, and establish rapport with the participant.

ONGOING CASE MANAGEMENT

- At the conclusion of a meeting, develop an action plan with the participant for the next
 meeting or point of contact. Plan meetings and contacts with purpose so that the participant
 knows what to expect. For example, schedule "participation appointments" to discuss
 participation in assigned activities and to evaluate the participant's progress towards his or
 her employment goals through participation in assigned activities.
- Initiate contact with the participant as often as needed to engage the participant. Depending
 on the participant's individual circumstances, the FEP may need to make more frequent and
 varied attempts to contact the participant.
- Complete the WWP Informal Assessment as frequently as needed. Review and discuss
 with the participant any questions or previous responses that may help to initiate
 conversation about potential barriers. Add tasks in the Action Needed app in WWP for both
 the FEP and the participant and incorporate action items into the SSP.
- Offer the participant assistance with developing or updating an SSP depending on the participant's circumstances.

DOCUMENTATION AND CASE UPDATES

- In addition to recording hours of nonparticipation in case comments, specify the reasons for nonparticipation and what actions were taken to address each reason. Also, specify the reasons for good cause and any actions that were taken to identify potential barriers and address known barriers to participation.
- Document the circumstances of participation as well as nonparticipation to ensure a sequential history of W-2 participation and help identify points where the participant's circumstances may have changed.
- Develop internal processes and procedures for reporting new employment, identifying and communicating employment changes to the FEP, and updating cases timely with new employment information (e.g., data exchange discrepancies, alerts) and making adjustments to the EP and placement timely.
- Upon making a placement change in CARES Worker Web, document the placement decision directly from the W-2 Placement Page by selecting the 'Add Work Program PIN Comment'. Comments entered from the W-2 Placement Page will transfer to CARES screen CMCC.

OM 19-16 Page 12 of 12

CASE MANAGEMENT RESOURCES

 Have quality assurance staff conduct case reviews on a regular basis and address negative findings one-on-one with the FEP.

- Identify external trainings and resources for FEPs on case management practices and techniques to better engage participants in the W-2 program (e.g., motivational interviewing and Ask JAN).
- Provide one-on-one training for the FEP. For example, provide "refresher" training on current policies or training on policy changes so that the FEP understands new processes or policy requirements.
- Have a supervisor meet with the FEP prior to the participant's appointment to discuss the
 details of the case (e.g., family demographics, participant's strengths, etc.) and to prepare
 the FEP for the appointment. Further, have the supervisor observe the appointment and
 provide feedback to the FEP on his or her interaction with the participant, activity
 assignments, case comments, etc.
- Provide a checklist for the FEP to review the case prior to initiating action to reduce the W-2
 payment or close the case (e.g., if good cause was provided, if nonparticipation was the
 result of undisclosed barriers, if assigned activities are appropriate, if accommodations were
 provided, etc.)

AGENCY ACTION

W-2 agencies must use this memo as a guide for:

- Familiarizing staff with W-2 refusal to participate policies and procedures;
- 2. Reviewing W-2 cases to determine what combination of services and strategies to implement to successfully engage participants in W-2 activities; and
- 3. Addressing any inconsistencies between agency practices and W-2 policy concerning appropriate placement and activity assignment that will allow individuals to participate.

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 WWP or CARES Functionality Questions: W-2 Help Desk

DCF/DFES/BWF/BY