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State of Wisconsin
Governor Tony Evers



TO: **W-2 Agencies**
TJ Contractors and Subcontractors
TMJ Contractors and Subcontractors
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:	20-07 (Amended)
DATE:	04/13/2020
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W-2 <input checked="" type="checkbox"/>	EA <input checked="" type="checkbox"/> CF <input type="checkbox"/> JAL <input checked="" type="checkbox"/>
RAP <input checked="" type="checkbox"/>	TMJ <input checked="" type="checkbox"/> TJ <input checked="" type="checkbox"/> Other EP <input type="checkbox"/>

SUBJECT: COVID-19 Temporary Adjustment of Verification Policy: Use of Best Available Information

CROSS REFERENCE: [W-2 Manual 4.1.2 Information Requiring Eligibility Verification](#)
[W-2 Manual 4.1.3 Requesting Verification from W-2 Participants](#)
[Emergency Order #12 Safer At Home Order](#)
[Executive Order 72](#)
[EA Manual 2.1 Verification of Eligibility Criteria](#)
[TJ/TMJ Manual 2.3 Eligibility Verification](#)
[W-2 Manual 17.2.1 Eligibility Criteria](#)
[W-2 Manual 18.2.6.1 RCA Eligibility Verification Requirements](#)

EFFECTIVE DATE: April 13, 2020

PURPOSE

The purpose of this memo is to describe:

1. A temporary adjustment of the verification policy for Wisconsin Works (W-2), Job Access Loans (JAL), Emergency Assistance (EA), Refugee Cash Assistance (RCA), and Transitional Jobs/Transform Milwaukee Jobs (TJ/TMJ); and
2. A new process for the use of the adjusted policy and a temporary verification code "C9-COVID-19" in CARES Worker Web (CWW).

BACKGROUND

On March 12, 2020, Governor Tony Evers issued [Executive Order 72](#) declaring a health emergency due to COVID-19 and directing all state agencies to assist in the state's response to the public health emergency. On March 24, 2020, the state of Wisconsin was put under a "[Safer At Home](#)" order that directs Wisconsin residents to stay at home and orders all non-essential businesses to close until April 24, 2020.

In response, the Bureau of Working Families (BWF) is adjusting its program policies that will allow easier access to its programs.

CURRENT POLICY

W-2, JAL, AND RCA

As a part of determining eligibility for W-2, JAL, and RCA applicants and participants, FEPs must obtain appropriate verification. [W-2 Manual 4.1.2](#) lists suggested sources of verification for each eligibility item that requires it (including JAL and RCA).

Per [W-2 Manual 4.1.3](#), if the individual has made a reasonable effort and cannot obtain required verification, does not have the power to produce verification, or requires assistance to do so, the W-2 agency must assist the individual. If the agency is unable to assist, the Financial and Employment Planner (FEP) must not deny an application or close a case based on the information that could not be obtained. The agency must use the available information to process the case and then reassess the case when the agency receives the requested information.

TJ/TMJ

As a part of determining eligibility for TJ and TMJ, workers must verify eligibility information provided by an applicant to determine whether the applicant qualifies for, or remains eligible for, the program. The chart in the [TJ/TMJ Manual 2.3](#) provides a list of suggested sources of verification. Contractors must seek further verification if there is other information that casts doubt on verbal or written, signed statements provided for verification. and lists appropriate verification items for TJ/TMJ program eligibility.

EA

As part of determining eligibility for EA, the worker must, within five working days after receipt of the completed EA Application, attempt to verify eligibility items as described in [EA Manual 2.1](#). Where not otherwise specified in EA policy, the W-2 agency may utilize the [W-2 Manual 4.1.2](#) for a list of suggested sources of verification.

If the EA applicant requests assistance in obtaining the verification information, the W-2 agency must provide assistance. If information that would typically be required for verification cannot be provided by the applicant, or cannot be obtained with the assistance of the W-2 agency within the five working days timeframe, an eligibility determination must be made based upon available information. Verification of eligibility must not delay the provision of assistance.

ADJUSTED POLICY

For all programs, W-2, JAL, RCA, TJ/TMJ, and EA, workers should first attempt to obtain verification from applicants using the current policies noted above. If the item can be verified in a way that is readily available to the applicant, such as a bank statement from an application on a participant's smart phone, workers must use the appropriate verification.

Due to COVID-19, however, it may be difficult or impossible for applicants and participants to obtain needed verification according to existing policies because of social distancing guidelines and the closure of businesses and organizations under the Safer at Home order. Additionally, leaving the house to obtain verification may increase the risk of contracting or spreading the virus.

Therefore, workers can now use the best available information as reported by the applicant or participant for verifying certain eligibility requirements in lieu of more conventional documentation, when necessary (see Table 1 below). Best available information in some cases may be the applicant verbally attesting that the information is true and accurate to the best of their knowledge.

When a data exchange generates a discrepancy in CWW, workers must continue to process those discrepancies according to current policy. Otherwise, workers should use the best available information as reported by the applicant or participant for verifying certain eligibility requirements.

USING BEST AVAILABLE INFORMATION

The first table below lists common eligibility items across programs that require verification, those for which are temporarily allowed to be verified using best available information if applicants or participants were not able to provide required verification, and for which programs these rules apply. If a program does not require the specific eligibility item, it is marked with a dash. Items that can be verified through data exchanges are not included as the availability of this information should be unchanged and unaffected by the public health crisis. The additional tables provide the same information for program-specific eligibility items.

Eligibility Item	Use of Best Available Information?	W-2	JAL	EA	TJ/TMJ	RCA
Identity	No					
Birth Date	No					
Wisconsin Residency	Yes	X	X	X	X	X
U.S Citizenship	No					-
Immigration Status or Qualified Non-Citizen Status	No					
Non-Custodial Parent	Yes	X	X	-	X	-
Social Security Number (SSN)	No					-
SSN Application Date	Yes	X	X	X	X	-
Earned Income	Yes	X	X	X	X	X
Unearned Income	Yes	X	X	X	X	X
Assets	Yes	X	X	X	X	X
Pregnancy	Yes	X	-	-	-	-

Eligibility Item	Use of Best Available Information?	W-2	JAL	EA	TJ/TMJ	RCA
At Risk Pregnancy (W-2 only)	Yes	X	-	-	-	-
School Enrollment (W-2 only)	Yes	X	-	-	-	-
Qualified Caretaker Relative or Relative Primary Caregiver (Includes relationship, care and control, and living with)	Yes	-	-	X	X	-

Emergency Assistance Verification Requirements ONLY	
Eligibility Item	Use of Best Available Information?
Homelessness	Yes
Impending homelessness	Yes
Fire, flood, natural disaster	Yes
Energy crisis	Yes
Financial crisis (Impending Homelessness/Energy)	Yes
Eviction/Foreclosure (Impending Homelessness)	Yes
Foreclosure of the applicant's rental home	Yes
Exhausted available resources (Energy)	Yes
Threat to health and safety (Energy)	Yes
Verify new permanent housing before payment (Homelessness/Impending Homelessness)	No
Confirm eviction will not proceed before payment (Impending Homelessness)	No
Need did not result from the applicant refusing to accept employment without good cause	Yes

Job Access Loan Verification Requirements ONLY	
Eligibility Item	Use of Best Available Information?
Proof of employment or bona fide job offer	No
Applicant is not in default on repayment of a previous JAL or W-2 overpayment.*	No
Not a migrant worker	Yes
Have an acceptable repayment plan that demonstrates ability to pay back the loan in an agreed-upon timeframe.*	No
Current and Valid drivers license (JAL for the purchase or repair of a vehicle)	No
Motor vehicle liability insurance (JAL for the purchase or repair of a vehicle)	No
Proof of permission from a probation, parole or extended supervision agent to purchase a vehicle. (JAL for the purchase or repair of a vehicle)	No

TJ/TMJ Verification Requirements ONLY	
Eligibility Item	Use of Best Available Information?
Unemployed for four weeks	Yes
Ineligible for unemployment insurance	Yes
Not receiving W-2*	No
Not worked in the program for 1,040 hours*	No
Subject to Child Support	No
Under a reunification plan	No
Ex-offender status	Yes
Foster Care status	No

*These eligibility items should be verified through the application process.

CWW CHANGES

A new verification code 'C9 – COVID-19' is available in CWW. The new verification code passes eligibility for W-2, Child Care, Healthcare, and FoodShare for programs that share these fields.

The screenshot shows the 'Liquid Assets' interface. At the top right, there are 'Cancel' and 'Reset' buttons, and a 'Total: 1' indicator. The main section is titled 'Effective Period' and includes fields for 'Begin Month' (04 / 2020), 'End Month' (MM / YYYY), and 'Last Updated' (04/07/2020). Below this is the 'Additional Information' section, which contains several fields:

- * Individual: MEREDITH PALMER 20F PP
- * Type: CH - CHECKING ACCOUNT
- * Jointly Owned?: N - No
- * Self-Reported Amount: \$ 400 . 00
- * Balance Date: MM / DD / YYYY
- * AVS Amount: \$
- Sequence: 1
- * Verification: C9 - COVID-19 (indicated by a red arrow)
- * Available?: Y - Yes
- * Verification: C9 - COVID-19 (indicated by a red arrow)
- Is the owner an EBD MA Applicant/Recipient?: (dropdown menu)

UPDATED PROCESS

If applicants or participants are not able to provide verification during their appointment because of the COVID-19 public health emergency, workers should accept the best available information that applicants are able to provide for the allowable eligibility items indicated above and enter C9-COVID-19 as the verification code for the corresponding field in CWW. Workers must not pend eligibility for the applicant or send a Verification Check List (VCL).

Agencies must document in case comments in CWW or EATS, and include the following information:

1. Best available information was accepted as verification;
2. The eligibility requirement(s) that the best available information policy was used for; and

3. The comment must start with "COVID-19" so it is easily identifiable as being related to the COVID-19 public health emergency.

For TJ/TMJ applicants, workers should enter a case note with items 1 through 3 above and include the date and time. The case note must be signed and scanned it into the Electronic Case File (ECF) within 30 days of the application.

If an applicant is unable to provide verification of an eligibility item for which the best available information is not allowed, as indicated above, agencies must follow current policy for all programs and continue processing the case without that verification to determine eligibility. If the required verification cannot be provided within the allowable timeframe then the agency must deny eligibility. For programs that allow for extensions, workers can extend the verification due dates up to 30 days if necessary.

AGENCY ACTION

Agencies must familiarize themselves with the verification policy for all programs they serve that are listed in this memo and begin practicing this adjusted policy and process immediately.

CONTACTS

For Policy Questions: DCFV2PolicyQuestions@wisconsin.gov

For CWW, WWP, and EATS Functionality: BWF Work Programs Help Desk
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DCF/DFES/BWF/MP