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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 needs 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, CARES*, and *WWP* 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 WWP Informal Assessment Driver Flow.
4. Using the WWP Informal Assessment information, educational needs assessment, career 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. 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 assessment, and career assessment. 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 ~~non-compliance nonparticipation~~, determining good cause, ~~applying payment reductions~~, and recording ~~participant progress participation, good cause, and make-up hours~~ in CARES WWP.

No change to the remainder of 1.2.3

4.4.2 Scanning Requirements

The following scanning guidelines must be followed by all W-2 agencies:

1. All ongoing case scanning must be completed within 30 calendar days of the reported/required case action having been performed in *CARES, CWW, or WWP* or within 30 calendar days of being received in the *W-2* agency. It includes the scanning of documents turned in at intake, review and those dropped off or mailed into the agency.

No change to the remainder of 4.4.2

4.6.1 Relocation into or out of Milwaukee County or Between Balance of State W-2 Agencies

W-2 participants who relocate into Milwaukee from the *BOS* must reapply at the W-2 agency serving the address to which they have relocated.

W-2 participants who relocate out of Milwaukee into the BOS or between BOS W-2 agencies must reapply at the W-2 agency that serves the county into which the individual has relocated. The individual may reapply at any of that agency's office locations. However, the agency must enroll the applicant in the W-2 Eligibility and Work Program offices for the county in which the applicant now resides.

Any time a participant relocates and will be served by a new W-2 agency, the outgoing W-2 agency must determine when to end-date the employment position according to the needs of the participant, W-2 employer/work training provider, and agency.

If a participant in a *CMF* or *CMF+* placement relocates into or out of Milwaukee or between BOS W-2 agencies, the participant cannot be enrolled into the incoming agency, nor may the participant remain in an open placement with the current W-2 agency. The *CMF* or *CMF+* placement may not transfer and must be closed at the originating agency when the participant leaves the county. The FEP at the originating agency must close the *CMF* or *CMF+* placement and end the W-2 episode. If the individual loses the employment that led to the *CMF* or *CMF+* placement while enrolled in W-2, the individual may reapply for W-2 in the county where the individual has relocated.

To end the employment position, the outgoing agency must end-date the placement on the *CWW* W-2 Placements page so that CARES will generate the final payment for activities completed during the last participation period. The outgoing agency must also end the EP all activities on CARES screen WPCH and disenroll the case from in *WWP*.

4.6.1.1 Relocation within a BOS W-2 Agency's Boundaries

W-2 participants in the *BOS* who relocate to a different county but remain with the same W-2 agency do not have to reapply. These participants may continue to receive services at any of the agency's office locations. However, the agency must transfer the case to the W-2 Eligibility and *WP* offices for the county in which the participant now resides. ~~When the agency transfers the case to the incoming *WP* office, CARES automatically end-dates open activities and reopens the same activities in the incoming *WP* office.~~

4.6.2 Transfers Between W-2 Agencies in Milwaukee County

For *W-2* participants who relocate from one Milwaukee W-2 geographical area to another, the outgoing W-2 agency must transfer the case to the incoming W-2 agency.

When a Milwaukee W-2 agency initiates a case transfer, it must use the Inter-Regional W-2 Participant Transfer Notice form notifying participants to continue with assigned activities until

they have met with a *FEP* in the new geographical area. For more detailed information on the Milwaukee transfer process, workers must refer to the Inter-Regional Transfer Procedure for Milwaukee W-2 Agencies.

In order to complete the transfer to the new W-2 agency, the outgoing agency must transfer the case to the incoming agency's W-2 Eligibility and *WIP* offices.

The incoming W-2 agency must meet with the participant within 10 working days from the date of transfer as reflected in the transaction list in WWP to conduct an Informal Assessment. The participant must remain in their existing W-2 placement and assigned activities until meeting with the new W-2 agency. Once the new FEP completes an informal assessment, he or she can determine if any changes should be made to the participant's placement, activities, supportive services, or accommodations. The incoming W-2 agency must keep the participant in the participant's existing W-2 placement and re-open assigned activities. The incoming W-2 agency must meet with the participant within 10 working days from the date of transfer as reflected on CARES screen WPTN. Once the FEP completes an informal assessment, he or she can make changes to the W-2 placement and assigned activities as well as provide supportive services or accommodations. The agency must document the assessment results. All results must be documented in PIN comments and on the appropriate *WWP* pages, in PIN comments, and any necessary changes must be made on the new EP. For more information on transferring assessment information, see W-2 Manual, [4.6.3](#).

5.3.1 Educational Needs Assessment

The purpose of the educational needs assessment is to determine if the W-2 applicant or participant needs, or would benefit from, education and training activities:

1. A course of study meeting the standards established under Wis. Stat. s. 115.29 (4), for the granting of a declaration of equivalency of high school graduation;
2. Technical college courses;
3. Educational courses that provide an employment skill;
4. English as a second language (ESL) courses that the Wisconsin works agency determines would facilitate an individual's efforts to obtain employment;
5. Adult basic education courses, including literacy skills and remedial math and reading courses; and
6. Employer-sponsored training.

The *W-2* agency is required to conduct an educational needs assessment with all new W-2 applicants and must reassess the participant for education and training needs before making a change in *W-2 placement*. The assessment must:

1. **Identify the applicant or participant's current educational levels.** Agencies must use a standardized educational assessment tool to determine educational levels if the FEP

determines an educational needs assessment is needed. *TABE*, *BEST*, and *TABE/CLAS-E* are standardized educational assessment tools supported in WWP.

The FEP must never delay eligibility determination and placement because completion of a standardized educational needs assessment tool is pending. If necessary to ensure timely placement, the FEP must use the best information available from the WWP Education History and Post-Secondary Education pages to fulfill the educational needs assessment requirement at application and inform the initial placement decision and EP.

For some applicants and participants, the self-reported information gathered through the WWP Informal Assessment Driver Flow may not accurately reflect current educational levels. When completion of a standardized educational needs assessment tool is necessary to determine or confirm the applicant or participant's current educational levels, the tool must be scheduled and documented in CARES WWP within 30 days of placement. See 6.4.1 for information on assignment of activities in CARES WWP.

No change to the remainder of 5.3.1

5.4.3 Using and Documenting Career Assessment Results

Career assessments and career exploration tools are used to help identify sectors, career pathways, training needs, and family-sustaining employment goals that match the results of the assessed work styles, skills, and interests. Career assessment tools can be administered throughout ongoing case management as an individual's skills, goals, and work readiness may change.

As an EP is developed, it is important to consider how the program employment goals fit into the applicant's or participant's longer-term career plan. Many industries have career pathways that enable employees to start in lower-skilled jobs and progress into increasingly higher paying jobs through training. The EP should identify any goals that are part of the individual's longer-term career plan. (See [6.1.1](#))

If a current participant does not have a career assessment documented in *WWP*, the career assessment must be scheduled within 30 days of an EP review and completed before the next EP review.

Assign Career Assessment as an activity on the EP component activity in CARES on screen WPCS. (See 6.4.1)

- Assign Activity Code UC (Up-front Career Planning) for applicants who receive up-front career planning services geared toward assessment of their career interests and guidance in the career planning process. This activity must be ended at time of W-2 placement.

- Assign Activity Code CE (Career Planning & Counseling) for participants who receive career planning and counseling services geared towards assessment of their career interests and guidance in the career planning process.
- Assign Activity Code OC (Occupational Testing) for participants engaged in occupational testing related to employment. For example, some employers may require a typing test for a clerical position.

~~Post career assessment results on the **Career Assessment** page in WWP, including related occupations and how the career assessment results are being applied to the EP and activities. (See 5.2.2) The FEP must discuss career assessment results with the individual and document on CARES screens WPJS (EP-1) and WPAS (EP-2). Individuals must be given and give them the opportunity to provide input on their W-2 placement and the activities that are assigned as part of the EP.~~

~~Post career assessment results on the **Career Assessment** page in WWP, including related occupations and how the career assessment results are being applied to the EP and activities. (See 5.2.2)~~

Scan assessment results into the participant's Electronic Case File (ECF) using code WVAS.

5.5.1.1 When to Use a Formal Assessment

A FEP can determine the need for a formal assessment at any point; however, a formal assessment must be offered within thirty (30) calendar days of any of the following situations:

1. When an applicant or participant presents medical or other information, including the applicant's or participant's own statements that indicate he or she may have a disability or other barrier to participation in the W-2 program or employment; or
2. When W-2 agency staff or contractors observe behavior that indicates the need for a formal assessment.

The FEP must offer a referral for a formal assessment in any of the following situations:

1. When a participant is placed in a *W-2 T* position. Participants placed in W-2 T must have a formal assessment scheduled and documented on the EP in CARES within 30 calendar days of placement into W-2 T; and
2. When the results of the *WWP* Informal Assessment indicates a need for further evaluation for identification of a disability or other barrier to participation in the W-2 program or employment.
 - a. **Note:** When a participant is referred for a formal assessment based on the information discussed during the *WWP* Informal Assessment, any relevant information must be shared with the assessing agency if the participant agrees to sign a release of information.

When offering a formal assessment, the FEP must:

1. Document the formal assessment referral date on the WWP Participant Barrier or in the Family Barriers page;
2. Open a FA – Formal Assessment Pending status for participants who agree to a formal assessment (see 6.4.1); and
3. ~~Participants offered or referred for formal assessment must~~ Have a formal assessment activity scheduled and documented on the EP CARES within 30 calendar days of the referral date indicated on the corresponding WWP Barrier Details or Family Barriers page.

No change to the remainder of 5.5.1.1

5.5.1.2 How to Use a Formal Assessment

The FEP must use the [W-2 Formal Assessment Agreement \(2565\)](#) to help explain to the applicant or participant the purpose of the formal assessment and the type of follow-up services and activities that may result from completing it. It is critical that the FEP explain the formal assessment process using positive language that reinforces how the applicant or participant may benefit from completing it. Through the discussion, the applicant or participant must be made aware that assessment results will enable the individual and his or her FEP to make informed decisions about:

- his or her W-2 placement;
- his or her employment goals and the activities that will help reach those goals;
- his or her ability to engage in training and education; and
- any special services and work site accommodations that he or she may need.

The applicant or participant must indicate at the bottom of the agreement his or her decision to complete or decline a formal assessment.

The FEP must use the best information available from an informal assessment to initially place an individual in an employment position when a formal assessment is pending. Participating in a formal assessment may be counted as participation in an employment position. The FEP must document all formal assessment information in WWP ~~and CARES~~ utilizing the WWP Participant Barrier and Family Barriers pages, the FA status, and the EP CARES screens, including PIN comments, as appropriate.

No change to the remainder of 5.5.1.2

5.5.7 Payment Reductions

Under the *ADA*, an individual cannot be required to disclose that he or she has a disability or be required to participate in a separate program for disabled individuals. *W-2* agencies must comply with this federal law when assigning activities to *W-2* participants. A participant must be given the opportunity to disclose a disability or other *barrier* to participate in the *W-2* program or employment before payment reductions are imposed. The following *W-2* policies provide these assurances to participants:

1. *W-2* payment reduction cannot be imposed on a participant for declining to complete a formal assessment.
2. A participant placed in *W-2 T* or *CSJ* who has agreed to and is referred for a formal assessment may not receive a payment reduction for any assigned activity until:
 - a. The formal assessment results are received by the *W-2* agency and the formal assessment activity has been ended on the EP ~~end-dated on CARES screen WPCS~~; or
 - b. The *W-2* agency has determined that the participant will not comply with the assigned formal assessment referral activity and the status and/or activity has been ended ~~end-dated on CARES screen WPCS~~.

After the formal assessment activity has been completed on the EP ~~and end-dated in CARES~~ and the *FEP*, in consultation with the participant, has made necessary adjustments to the participant's *EP*, the individual may receive a payment reduction for failing to participate in assigned *W-2* activities without good cause. This may include an activity recommended by the qualified assessing agency such as mental health counseling or physical therapy.

6.1 Employability Plan Overview

An Employability Plan (EP) is a written agreement developed jointly by the *FEP* and the applicant or participant. However, the *RS* may write the initial EP during the *W-2* application period if the applicant is assigned up-front job search.

The EP is a single written document outlining how an applicant or participant will achieve a specific employment goal or, if appropriate, a goal to obtain *SSI* and/or *SSDI* benefits. The EP details what the individual will do through his or her participation in the program to achieve that goal and how the *W-2* agency will assist.

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;
- 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](#))

Each time an EP is developed or changed, it must be filled out in WWP, CARES, printed, signed by the FEP (or RS if in the application phase) and the applicant or participant must be given the opportunity to sign the EP, and provided a copy of the completed EP. If the applicant or participant refuses to sign the EP, the agreement is still considered binding because the individual committed themselves to W-2 participation when signing the W-2 Participation Agreement.

No change to the remainder of 6.1

6.1.1 Parts of the Employability Plan

The *EP* consists of ~~three~~ four parts:

1. Goals (see 6.1.1.1);
2. Employments (see 6.1.1.2);
3. Activities (see 6.1.1.3); and
4. Supportive Services (see 6.1.1.4).

6.1.1.1 ~~Part 1: Program Employment Goals and Related Goals~~

This section of the EP lists goals developed jointly between the FEP and the applicant or participant using assessment results. For each goal added to the EP, goal steps document smaller, specific actions the applicant or participant can take to reach the goal.

The types of goals available on the EP are:

1. ~~Program~~ Primary and Secondary Employment Goals:
~~This section of the EP identifies s~~ 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:
 - a. 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 assessment, career assessments, vocational evaluation/assessments*, or other formal assessments).
 - b. 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 or her 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](#))

- c. 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 WisConomy and the Job Centers of Wisconsin are excellent resources for labor market information. Skill Explorer may be used to align participants' skills, interests, and needs with occupations.
- d. 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.

If the applicant or participant is not ready to identify a specific occupation when the goals are initially developed, the focus of the goal may be broadened to a field of interest or an industry sector. Career assessments and career exploration tools should be used to help identify sectors, career pathways, training needs, and family-sustaining employment goals that may match the results of the assessed work styles, skills, and interests.

Related Goals

2. ~~Short-Term~~ Other Program Goal:

~~This section must identify~~ Concrete short-term goals or outcomes the applicant or participant must achieve through W-2 participation in order to move in the direction of his or her employment goal. This may involve completing education or training courses or acquiring work experience in his or her field of interest. It may also involve overcoming a barrier to employment through assigned activities such as physical rehabilitation, treatment or counseling.

3. Long-Term Career Goal:

Goals that are part of the individual's longer-term career plan. As the EP is developed, it is important to consider how the program employment goals and ~~the related short-term~~ Other Program Goals fit into the applicant's or participant's longer-term career plan. Many industries have career pathways that enable employees to start in lower-skilled jobs and progress into increasingly higher paying jobs through training. ~~This section should identify any goals that are part of the individual's longer-term career plan.~~

4. ~~Part 2:~~ Personal Goals

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

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

6.1.1.2 Employments

This section of the EP lists the applicant or participant's current employment(s) added from the Work History page in WWP, including average weekly hours. Average weekly hours and an individual's work schedule must be considered when scheduling other activities to include in the EP.

6.1.1.3 Part 3: Program Activity Plan Activities

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.
2. ~~The activity must be described in some detail on the EP~~ An activity description to ensure that the applicant or participant fully understands what the activity involves.
3. The provider of service and activity location.
4. The activity schedule(s). This includes a planned begin and end date, ~~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.~~
5. ~~Provider of service.~~
6. ~~Address of the site where the activity is located.~~
7. ~~Supportive services required to complete the activity.~~
8. ~~The travel time to and from the activity.~~
9. Any additional remarks to assist the applicant or participant.

6.1.1.4 Supportive Services

This section of the EP includes the supportive services the W-2 agency will provide the applicant or participant to assist in completing the W-2 activities included in the EP.

Examples of supportive services include:

- Onsite Child Care;
- Education/Training Funding;
- Transportation Funding;
- Work-Related Clothing;
- Work-Related Equipment; and
- Gift Cards
- Other

6.2.1 Developing the Employability Plan

The *EP* is developed through a collaborative process between the *FEP* and the applicant or participant taking into consideration the individual's personal strengths and barriers identified through assessment. It details what the individual will do to reach his or her employment goal (or goal to obtain *SSI/SSDI*) and what the *W-2* program will do to assist in that effort. When the applicant or participant has a role in developing the EP, he or she will be more committed to completing the plan and working towards the employment (or *SSI/SSDI*) outcome.

When appropriate, the applicant's or participant's family members may also provide input. In a two-parent household, a meeting with each parent must be conducted to assess total family strengths and determine which parent is more appropriate for *W-2* placement. (See [Chapter 14](#))

Before placing a *W-2* participant into an employment position or case management placement (see [6.1](#)), an EP must be developed during a face-to-face meeting, except in the following circumstances:

1. When there are extreme circumstances that prevent a participant from coming to the agency such as when a participant is hospitalized or homebound due to illness. When one of these circumstances prevent a participant from coming to the agency, the worker must either conduct a home visit or communicate with the participant by phone to ensure that the participant has the opportunity to provide input into the development of the EP and understands what is expected of him or her.
2. If an individual who is transitioning from a paid placement to a *CMF* or *CMF+* placement has a work schedule that makes it difficult to come into the office for a face-to-face EP appointment, the agency may conduct the EP appointment by phone.

If the agency has attempted but is unable to connect with the participant by phone, the agency may change the placement to *CMF* or *CMF+* prior to the EP appointment. (See [7.2.3.5.3](#))

When this occurs, the agency must mail an updated EP to ensure that the individual has in his or her possession an EP that aligns with the changes in activities. ~~Prior to~~

~~printing and mailing the EP, the agency must reset the expiration date on the EP in CARES to expire~~ The EP end date must be 30 days after the date the CMF or CMF+ placement started on the new EP. This will give the participant the option to complete an EP appointment (either face-to-face or by phone if unable to come in person due to work schedule) within 30 days or allow W-2 to close for noncooperation with program requirements.

The EP must be developed ~~written~~ for a duration of no more than 6 months. The EP may be updated during that timeframe to reflect any changes in assignment of activities without a face-to-face meeting. However, under no circumstances, except as described above in item #2, can the FEP change the activities in the EP without first discussing the change(s) with the participant.

Each time an EP is developed or changed, it must be filled out in WWP, CARES, printed, signed by the FEP (or RS if in the application phase) and the applicant or participant must be given the opportunity to sign the EP, and provided a copy of the completed EP. If the applicant or participant refuses to sign the EP, the agreement is still considered binding because the individual made a commitment to participate in assigned activities when signing the W-2 Participation Agreement.

6.2.2 Employability Plan Review

An *EP* review must occur at a minimum once every six months and be scheduled to occur before the date the EP ends 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 the remainder of 6.2.2

6.2.3 Coordination with Other Programs

When developing the *EP*, the *FEP* and applicant or participant should consider and incorporate input from other programs the individual is connected with such as the Workforce Innovation and Opportunity Act (WIOA) program, the Division of Vocational Rehabilitation (DVR), the Wisconsin Technical College System (WTCS), the Refugee Assistance Employment and Training Program, mental health, child welfare safety services, housing, domestic violence and *AODA* programs.

EXAMPLE: Monica is working with a domestic violence victim program. Her advocate there is helping her find housing. Monica also attends weekly group counseling sessions and

brings her daughter to individual counseling sessions every other week. Monica has signed the form *Authorization for Disclosure of Confidential Information (10779)* allowing her FEP to consult with her DV advocate and counseling professionals as needed. In developing her EP, Monica's FEP incorporates her housing search and domestic violence activities.

W-2 agencies are required to work with local Job Center partner agencies to jointly serve persons under the Job Center network delivery model. Applicants or participants should be encouraged to seek out opportunities for dual enrollment in other Job Center programs such as Job Service/Labor Exchange Services, WIOA and DVR and take advantage of all resources available through the Job Center system. Any activities included in the W-2 applicant's or participant's EP must conform with W-2 policy.

Working cooperatively with local partner agencies on EP development reduces duplication of effort across work programs and maximizes the resources available to the applicant or participant. Therefore, the FEP should consult with other Job Center agencies as appropriate when developing the W-2 EP. However, W-2 agency staff must ensure that a W-2 CARES printed EP is attached to any jointly developed EP since this is the primary EP document for W-2 applicants or participants.

No change to the remainder of 6.2.3

6.3.3 Making Up Missed Hours of Participation

There may be times, when the participant's work schedule fluctuates due to the need to make up work hours missed earlier in the week. ~~No action is necessary on the part of the worker~~ When the participant makes up the missed hours in the same week they were scheduled (Sunday – Saturday), FEPs must record in WWP by entering the Make-Up hours. If the participant ~~misses hours of participation for a day, and~~ does not make up those missed hours at some point during the week in which they were assigned, all remaining missed hours ~~must be recorded as nonparticipation~~ will be calculated as nonparticipation and the good cause policy must be applied when appropriate. (See [11.2](#))

6.4.1 CARES Screen WPCS Participation Statuses

Participation Statuses represent factors that may impact an individual's EP activity assignments in W-2. FEPs must take these factors into consideration when developing the EP. While not part of the EP, they are displayed in WWP on the left side navigation menu when creating and

reviewing current EPs. Participation Statuses do not have scheduled hours associated with them and do not require participation tracking.

The following are available statuses to report for W-2 participants:

1. CD – Caring for Disabled Child (Valid for W-2)

Report this status when an individual is providing care to a dependent child with a disability or incapacitation. Documentation of the need for the participant to be the sole provider of care must be provided by using the form [Need to Care for Disabled Family Member \(10786\)](#) or an agency-developed form that, at a minimum, has the same elements. (See [7.4.2.1 #2](#))

Reporting this status will exclude the participant from Federal Work Participation calculations.

2. CF – Caring for Other Family Member (Valid for W-2)

Report this status when an individual is providing care to an adult W-2 Group member with a disability or incapacitation. Documentation of the need for the participant to be the sole provider of care must be provided by using the form [Need to Care for Disabled Family Member \(10786\)](#) or an agency-developed form that, at a minimum, has the same elements. (See [7.4.2.1 #2](#)).

Reporting this status will exclude the participant from Federal Work Participation calculations.

3. EC – Child Care for Employment Skills Training (2 year) (Valid for W-2)

Report this status when a W-2 participant is receiving up to two years of FEP authorized child care to enable the participant to engage in voluntary educational and training activities.

4. EI – Employer Intervention Services (Valid for W-2 and Learnfare)

Report this status when services are it is directed at the employer to facilitate the resolution of job retention barriers faced by the participant. These services could include:

- Enhancing communication channels between the employer and participant,
- Employer counseling,
- Suggesting acceptable work-site accommodations, and
- Other on-site interventions with the employer on behalf of the participant.

The length of the service should reflect the time working with the employer.

Note: This status is used to record **employer** intervention services provided by the W-2 agency. To record employment retention activities required by the participant, use the Job Retention Services (JR) activity code on the individual's EP.

5. FA – Formal Assessment Pending

Report this status when an individual placed in a W-2 T or CSJ who has agreed to and is referred for a formal assessment but has not yet completed the assessment.

Participants will not receive any payment reduction for nonparticipation that is recorded for **any** assigned activities on days with this status open. (See 5.5.7)

6. SD – SS(D)I Advocacy/Application

Report this status when the W-2 participant is in the process of applying for SSI or SSDI and the W-2 agency or another provider is providing related services. Examples include meeting with an SSI advocate or attorney, working with the FEP on filling out the SSI forms, attending hearings, etc.

In conjunction with developing and documenting detailed activities for a W-2 applicant or participant on his or her EP, the FEP must also enter correlating CARES activity codes on screen WPCS. The way in which activities are listed on the EP should not, under most circumstances, replicate the activity codes, however. The activities listed on the EP should be more detailed and descriptive than the codes entered on WPCS.

See the W-2 Manual Appendix – Activity Codes for a complete listing of the W-2 activity codes.

The activity information entered on WPCS/WPCH must be accurate (i.e., begin date, weekly scheduled hours, daily scheduled hours, actual end date) and align with the applicant's or participant's EP on WPAS.

EXAMPLE: While developing an EP for Nancy, the FEP and Nancy talk about the many employment opportunities that exist for women in nontraditional careers such as welding and construction. The FEP informs Nancy about a six-week full-time training program geared towards giving women an introduction to the building trades and hands on experience with tools and building materials. The program includes basic hands-on shop classes in carpentry, electrical work, painting, lifting and carrying, trades math, and health and safety training. Nancy, who based on an assessment, enjoys working outdoors and has some aptitude for mechanical work, agrees that this program would be a good match for her.

On Nancy's EP in CARES, in the section marked Activity 1, the FEP enters the following: "Participate in New Opportunities for Women (NOW) Program - Construction." The FEP goes on to fill in the relevant information for the activity (address, hours, begin and end dates, etc.). The FEP includes in the "Remarks" section for Activity #1 the days of the week and times each day when Nancy must participate.

On CARES screen WPCS, the FEP enters the details for the activity "JS" for Job Skills Training.

7.2.3.2 Case Management Services for CMF and CMF+ Participants

The W-2 agency must offer case management follow-up services for up to 12 consecutive months. During the 12-month period, the FEP must provide appropriate services and maintain regular contact; most CMF and CMF+ participants should receive biweekly or no less than monthly contact.

Activities provided through case management services may include:

- Job Retention Services (JR);
- Literacy Skills (LS);
- Vocational Literacy Skills (VL);
- Vocational Adult Basic Education (VA);
- English as a Second Language (EL);
- Vocational English-as-a-Second-Language (VE);
- Adult Basic Education (BE);
- General Educational Development (GE); or
- High School Equivalency Diploma (HE);
- ~~Working Full-Time (WF); or~~
- ~~Working Part-Time (WP).~~

7.2.4 Unemployed Individuals Capable of Obtaining Employment Case Management for Job Ready Individuals (CMJ)

The Case Management for Job Ready Individuals (CMJ) placement is for unemployed individuals who are able to find and keep employment. The goal of the CMJ placement is to rapidly connect the individuals who are job ready to employment. CMJ is only available to *W-2* applicants, and in limited situations, to case management follow-up (CMF) participants, case management follow-up plus (CMF+) participants, case management underemployed (CMU) participants, and Custodial Parent of an Infant (CMC) participants.

No change to the remainder of 7.2.4

7.2.4.3 General CMJ Participant Description Characteristics

For the *W-2* agency to determine that an individual is appropriate for a CMJ placement, all of the following must apply:

1. The individual is willing to work. Because *W-2* is a work program, individuals who apply for the program are assumed to be willing to work.
2. The individual has no barriers to work that cannot be addressed with *W-2* services so that the individual is ready for immediate employment within 30 days.

Below are examples of barriers that the *W-2* agency can address through services:

- Child care subsidies through Wisconsin Shares and help locating child care;

- Housing assistance through Emergency Assistance, W-2 supportive services funds, and/or referrals to other local housing programs;
- Transportation assistance through W-2 supportive services funds, a Job Access Loan and/or referrals to other local transportation assistance programs;
- Help paying for work related expenses through W-2 supportive services funds, a Job Access Loan and/or referrals to other local assistance programs; and
- Help completing a resume, providing targeted job leads, job coaching, job development, etc.

Individuals who have more significant barriers, e.g., physical or mental impairments, family issues, legal problems, etc., that take longer than 30 days to resolve are not appropriate for CMJ.

If the FEP identifies barriers that can be addressed through W-2 services so that the individual is ready for immediate employment, the barriers and the services that will address those barriers must be documented on appropriate *WWP* pages and ~~CARES screens~~ including:

- WWP Participant Barriers page;
- WWP Family Barriers page;
- Employability Plan ~~CARES screens WPJS and WPAS~~; and
- Additional details must be documented in PIN comments. (See [4.3.3](#))

No change to the remainder of 7.2.4.3

7.3.3.3 Verification of Time Records

The W-2 agency must collect and verify timesheets for hours actually worked by a TEMP employee prior to making payments to an employer.

The W-2 agency must manually issue payments to an employer to cover wage subsidies paid monthly to a TEMP employer for each TEMP employee and accurately record the hourly subsidy in wage history in WWP ~~wage subsidy payments on CARES screen WPSS~~.

7.4.2.1 General W-2 T Participant Description Characteristics

Participants placed in a *W-2 T* must have a formal assessment, as described below, scheduled and documented in ~~CARES WWP~~ within 30 calendar days of the W-2 T placement. The *FEP* must not assume that participants who have a disability are unable to participate in an employment position other than W-2 T, including unsubsidized employment. The FEP may place a participant

in a W-2 T when the participant is incapable of performing a *CSJ*, as determined by the W-2 agency, for reasons which may include:

1. The participant is determined, based on an independent assessment by a medical professional or similar qualified assessing agency or individual, to be or expected to be incapacitated for a period of at least 60 days. Examples of incapacitation that would warrant an assessment may include:
 - Physical limitations;
 - Mental health limitations;
 - Cognitive limitations;
 - Learning disabilities;
 - Victim of Domestic Violence; and
 - Substance abuse.

Section [5.5.4](#), Obtaining a Complete Assessment, describes the types of information that must be gathered through assessment and the methods for obtaining the information.

EXAMPLE 1: Ms. Anderson is a single parent with two children. She was a waitress until three months ago when her rheumatoid arthritis worsened to the level that she was no longer able to work. Ms. Anderson is placed in a W-2 T position and is referred for a vocational assessment. The results of the assessment show that with special sitting accommodations, rehabilitation and training, Ms. Anderson will be able to perform a sedentary job. Areas of employment recommended by the assessing agency include computer data entry, customer service, or telemarketing. Ms. Anderson and her FEP agree to revise her employability plan, emphasizing activities that will allow her to work towards a job in customer service. Her participation requirement is 27 hours per week in a physical rehabilitation program, which involves physical therapy and teaches independent mobility, plus three hours of work training. After completing three months of rehabilitation, Ms. Anderson is moved to a CSJ, where she is able to participate a full 40 hours per week in a combination of work training and education activities. Five months after placement in the CSJ, Ms. Anderson is successfully employed in a manufacturing company in their customer service department.

2. The participant is needed in the home to care for another member of the W-2 group who is ill or incapacitated. The following steps must be taken when determining the need for a W-2 adult to remain in the home to care for a family member:
 - a. Using the [Need to Care for Disabled Family Member \(10786\)](#) form (or an agency-developed form that, at a minimum, has the same elements), verify the incapacity/disability of the affected family member and the appropriateness of day/child care outside of the home through third party sources. The FEP may consider statements from sources such as medical professionals, the Social

Security Administration, Family Support Program, Birth to Three Early Intervention Program, Program for Children with Special Health Care needs, and Exceptional Educational Needs Program. Supportive adult programs under the 51.42 service board or Independent Living Centers for a physical disability or mental health issues are other verification sources.

- b. Determine whether day/child care outside the home is available for the disabled/incapacitated family member so that the participant can engage in work training activities outside the home. The Americans with Disabilities Act (ADA) requires that any day treatment or day care facility accommodate a child or elderly person and provide reasonable accommodations for individuals with disabilities. However, where a reasonable accommodation cannot be made or the care is not available, lack of adequate child care is a good cause reason for not participating in W-2 requirements outside the home. Written documentation from one or more local day/child care providers is sufficient verification that appropriate care is not available.

EXAMPLE 2: Ms. Johnson applies for W-2. Her daughter Kathy, age 8, is in an advanced stage of leukemia. Kathy has been hospitalized numerous times over the school year and has had extended absences from school. She has an extremely fragile immune system and can no longer be exposed to other children in a school or day care setting. The FEP places Ms. Johnson in a W-2 T employment position and assigns her 38 hours per week of care for her child with a disability. Ms. Johnson indicates to her FEP that her mother is available for two hours per week so she can also attend grief mental health counseling sessions. The activities are recorded in CARES and on Ms. Johnson's EP.

7.4.2.2 W-2 T Participation Requirements

An in-depth formal assessment will determine the appropriate level of W-2 participation, the person's ability to engage in specific work and training activities and the need for supportive services, accommodations, auxiliary aids or communication assistance. (See [5.5.1](#)) Attendance and cooperation with an in-depth assessment may satisfy participation requirements pending the results of the formal assessment. A W-2 payment reduction cannot be imposed on a participant for declining to complete a formal assessment. (See [5.5.7](#))

Based on the results of the assessment the participant may be assigned up to 40 hours per week in activities which may include work training, other W-2 T activities and education and training.

W-2 T work training activities approved by the FEP may include activities such as a:

- Community rehabilitation program - a program that provides directly or facilitates the provision of vocational rehabilitation to individuals with disabilities and that enables an

individual with a disability to maximize opportunities for employment. Services may include vocational assessment, job readiness training, job placement and on-the-job support targeted at individuals with disabilities. Assignable activities will vary depending on the focus of the program, but may include:

- o Disability and Learning Assessment (AD);
 - o Career Planning & Counseling (CE);
 - o Employment Search (ES);
 - o Mentor/Coach (MN);
 - o Job Readiness/Motivation (MO);
 - o Occupational Testing (OC);
 - o On-The-Job Training (OJT);
 - o Paid Work Experience in the public sector, not funded by TANF (SW); or
 - o Work Experience (WE).
- Activities similar to a CSJ but with more supervision.
 - Volunteer activity. Assignable activity is Work Experience (WE).

Other common activities and statuses assigned to W-2 T participants include:

- AODA detoxification, assessment and treatment. Assignable activities may include AODA Counseling (CA) and AODA Assessment (AA) and Personal Development (PD);
- Mental health activities, as prescribed by an appropriate health care professional. Assignable activities may include Mental Health Assessment (AM) and Mental Health Counseling (CM);
- Counseling or physical rehabilitation activities. Assignable activities may include Physician's Assessment (AL), Ongoing Medical/Personal Care (MP), Physical Rehabilitation (PR);
- Court ordered activities. Assignable activity is Court-Related/Legal Appointments (LA);
- Activities related to obtaining shelter or retaining safety in a domestic abuse situation or other activities needed to stabilize a family. Assignable activities may include Domestic Violence Assessment and Supportive Services (AV) and Personal Development (PD);
- Activities that will provide support for children with special needs. Assignable activity is Family Member Treatment/Counseling (FC); and
- Caring for a family member with an incapacity of such severity that without home care, the incapacitated member's health and well-being would be significantly affected, as determined by the W-2 agency. ~~Assignable activities~~ Reportable statuses are Caring for Other Family Member (CF) and Caring for Disabled Child (CD). (See 6.4.1)

No change to the remainder of 7.4.2.2

7.5.1.3.3 Stipend Procedures

The W-2 agency must create a standard operating procedure (SOP) establishing consistent procedures for issuing a stipend. Regional DCF contractor staff must approve the new SOPs.

The W-2 agency must manually issue stipend payments to NCPs in the TSP placement who meet the participation requirements for a stipend (see [7.5.1.3.1](#)) and must document in PIN comments ~~accurately record stipend payments on CARES screen WPSS.~~

7.5.2 Case Management for Minor Parents (CMM)

The Case Management for Minor Parents (CMM) placement is for individuals who are custodial minor parents. A custodial minor parent (under the age of 18, male or female) is eligible for *W-2* regardless of the minor parent's living arrangement and his or her financial or nonfinancial eligibility status.

No change to the remainder of 7.5.2

7.5.3 Case Management for Pregnant Women (CMP)

The Case Management for Pregnant Women (CMP) placement is for pregnant women who do not have custody of any children. These individuals may receive services through a case management pregnancy placement.

No change to the remainder of 7.5.3

8.3.2.3 Aggregating Education and Training Hours

The FEP may aggregate education and training hours to allow W-2 T and CSJ participants access to short-term intensive training programs that require more than 10 or 12 hours of participation per week. Totaling education and training hours in this manner allows the FEP to place the CSJ or W-2 T participant in a short-term program.

The aggregation policy can be applied and should be considered for education and training programs that a participant can complete within a one-year period with participation in up to 516 hours of education and training activity. In addition to the education and training activities, the FEP must assign some work training activities each week, not to exceed a total of 40 hours of participation per week.

~~In the comments section of the EP or in PIN comments, t~~ The FEP must document in PIN comments that the aggregation policy was used, the amount of aggregated education and

training hours, the occupational skills to be gained, and the expected number of weeks needed to complete the training.

No change to the remainder of 8.3.2.3

10.2.6 Issuing Auxiliary Payments

There are two different types of auxiliary payments:

1. **Automated auxiliary** payments are system-calculated and automatically issued in WWP. These payments are issued when a worker takes an action following either the Delayed Cycle or the W-2 Pulldown cycle that causes a recalculation of the payment amount owed.

The actions that can result in an automated auxiliary payment include:

- Backdating a paid placement after Delayed Cycle into a previous month;
 - Backdating a paid placement into a prior participation period; or
 - Changing participation data after the W-2 Pulldown Cycle such as adding Good Cause for hours of nonparticipation.
2. **Manual auxiliary** payments can be created in WWP for cases where an auxiliary will not be calculated automatically, such as auxiliaries that must be issued as a result of a Fact Finding Review.

All auxiliary payments will be issued to the participant via the Benefit Issuance (BI) subsystem in CARES Mainframe.

For lost, stolen, or destroyed W-2 or vendor checks, refer to the [Appendix – Benefit Issuance Guide](#).

~~While **W-2** payments are generally calculated and issued by **CARES**, there are times when a payment calculation may be incorrect resulting in the issuance of a W-2 payment less than the amount that was intended. In addition to under-issuances, there may be situations in which participants were supposed to receive a W-2 payment, but for some reason did not. These situations must be rectified with auxiliary payments created by the W-2 agency and issued through CARES. The auxiliary payment will either supplement a W-2 payment under issuance or replace a W-2 payment that should have been issued, but was not. Auxiliary payments are sometimes referred to as "supplemental payments" or just "supplements".~~

10.2.6.1 CARES W-2 Auxiliary Payment Approval Worker

There is a two-party W-2 auxiliary payment approval process. W-2 agencies are responsible for keeping their list of designated approval workers current in CARES and WWP.

For CARES, each W-2 agency must have an identified CARES W-2 Auxiliary Payment Approval Worker. The minimum number of approvers for an office is two and the maximum is six. The same worker may be an approver for more than one office. The approval worker CARES logon is displayed on CARES screen BIAW. In order to establish a CARES W-2 Auxiliary Payment Approval Worker, the agency must complete the form [Job Access Loan, W-2 Auxiliary Payment and/or Performance Outcome Payment Claim Approval Designation \(2582\)](#).

~~If CARES W-2 Auxiliary Payment Approval Workers leave their agencies or change job functions, their CARES logon will need to be removed from CARES screen BIAW. W-2 agencies are responsible for keeping their list of designated approval workers up-to-date. When an approval worker is added or deleted from an office, the agency must check screen BIAW to see if another worker will need to be deleted or added at the same time. The W-2 Auxiliary Payment Approval Designation form must be completed with worker addition or deletion changes.~~

For WWP, each W-2 agency must have at least two identified W-2 Auxiliary Approvers. The agency must complete the form [WWP Application – User Setup Form \(5212\)](#) in order to add or delete an agency worker as a W-2 Auxiliary Payment Approver in WWP. Current W-2 Auxiliary Approvers for each agency are listed in WWP under Worker Tools.

11.1.2 Entering ~~Non~~Participation Hours in CARES

~~In order to apply hourly payment reductions to ensure participants' W-2 payments are accurate, the FEP must record enter all nonparticipation data hours in the W-2 Participation Calendar in WWP on CARES screen WPNH. When entering nonparticipation hours on WPNH, the FEP must enter:~~

- ~~1. Hours participated based on the scheduled hours of each activity. Hours participated must be documented for each day and activity separately, and do not include hours where good cause was granted or make-up hours.~~
- ~~2. Hours participated that are scheduled on one day but are made up during a different day within the same week. (See 6.3.3)~~
- ~~3. The participant's reason for nonparticipation, if provided, and whether good cause is granted. If good cause is granted, the number of hours approved for each activity are entered on each day separately. (See 11.2.3)~~
- ~~1. Nonparticipation hours reported throughout the participation period.~~
- ~~2. Daily nonparticipation hours only. When entering hours of nonparticipation, the date entered in the NON PART DATE field must be the same date entered in the THRU field.~~
- ~~3. Up to 8 hours of nonparticipation per day in the NP HOURS field.~~
- ~~4. Nonparticipation hours even if a participant has good cause.~~
- ~~5. Nonparticipation hours for each assigned activity separately.~~

EXAMPLE 1: Michelle is scheduled for Work Experience on Monday from 10 am to 12 pm but is unable to go. She calls her FEP and explains her situation. The FEP determines that her reason for missing the scheduled activity meets the good cause policy.

The FEP enters 0 hours participated for WE on Monday. WWP calculates 2 hours of nonparticipation. The FEP then enters 2 hours of Good Cause.

EXAMPLE 2: Tamara is scheduled for a 1-hour ESL class on Tuesday evening but is unable to attend. Instead, she attended the same class later in the week on Thursday.

For Tuesday, the FEP enters 0 hours participated for EL, and 1 hour of make-up hours with Thursday's date.

~~CARES calculates~~ The monthly W-2 payment is calculated based on the following rules:

1. Payment reductions for missed hours are deducted from the payment for the participation period during which hours were missed.
2. In order to affect the next payment, the final date that participation data nonparticipation and good cause hours can be entered into WWP CARES is the date the W-2 Pulldown payment cycle is scheduled. ~~If there are changes to participation data after W-2 Pulldown, WWP will calculate to determine if an auxiliary payment or overpayment is necessary. Once the date for W-2 Pulldown has passed, the worker must make payment adjustments via auxiliary payments or recoupment of overpayments.~~
3. ~~Nonparticipation cannot be entered if the date of the nonparticipation falls outside of the assigned activity dates in the BEGIN DATE or ACTUAL END DATE fields on CARES screen WPCH.~~
4. A payment reduction is not imposed on a participant for failing to complete a formal assessment.
5. A payment reduction is not imposed ~~while~~ for nonparticipation in any activities that are scheduled on a date that a formal assessment activity is open on the EP or the Formal Assessment Pending status is open ~~a formal assessment is assigned on CARES screen WPCH.~~ A payment reduction cannot be imposed until:
 - The formal assessment has been completed;
 - The assessment activity code has been ended on the EP ~~end-dated on WPCH;~~ and
 - The FEP, in consultation with the participant, has made the necessary adjustments to the participant's Employability Plan.

Payment reductions are specific to a W-2 Group and, therefore, do not follow a participant. Even if a participant moves out of the W-2 Group, any payment reduction for missed hours or penalties associated with that individual during the current participation period are deducted

from the next W-2 payment issued to that W-2 Group. Recovery of overpayments continues to follow an individual from W-2 Group to W-2 Group.

For additional information on entering nonparticipation, see [W-2 Manual Appendix – TANF Work Participation Requirements](#).

11.2.2.1 Child Care Availability

A single parent placed in *W-2 Employment Positions* cannot be sanctioned for nonparticipation in any W-2 activities during a period of time when he or she is unable to obtain child care for a child under the age of 13. If child care is only available to the participant during specific hours of the day or days of the week, the W-2 agency must make every effort to assign work activities during those hours.

An applicant or participant who needs to secure child care arrangements in order to participate in W-2 activities should be assigned the task of securing child care as part of his or her participation requirements on the Employability Plan (EP). The CARES W-2 activity code associated with this activity is Child Care Related Activities (CC). See [W-2 Activity Code Appendix](#).

11.2.3 Approving or Denying Good Cause

FEPs are responsible for determining if a *W-2* participant had good cause for not participating in W-2 assigned activities. While the good cause policy is meant to model what an employer may allow under its own absence policy, FEPs must consider the fact that participants may face hardships that make completing activities and notifying the agency of missed activities more difficult, e.g., phone availability, reliable transportation, etc.

~~If the FEPs must determine that if the participant's explanation for the absence or the written verification of the absence meets the allowable good cause reasons, the FEP must enter the hours participated of nonparticipation, the participant's reason for the nonparticipation, and indicate whether there is good cause for the nonparticipation is granted. If there is good cause, the FEP must select the worker reason for approving along with the appropriate number of good cause hours approved, and the good cause CARES code on CARES screen WPNH and document the reason for approving the good cause rationale in PIN comments. If the FEP determines that the participant's explanation for the absence or the written verification of the absence does not meet any of the allowable good cause reasons, the FEP must enter the hours of nonparticipation on CARES screen WPNH and document select the worker reason for denying good cause as well as referencing the number of hours, dates and activities missed in PIN comments.~~

When documenting the reasons for approving or denying good cause, the FEP must use the **Good Cause Determination** Comment Type so monitoring staff will be able to easily identify comments related to good cause decisions.

11.2.4.2 Verifying Good Cause

If the FEP determines that written verification is necessary for a pattern of absences, the FEP must first check in the Electronic Case File (ECF) to ensure that written verification does not already exist. Examples of written documentation include a signed medical statement, an update to existing medical information from a licensed physician or some other qualified assessing agency, etc. If it does not, the participant must be informed in writing of the verification items required, including the due date. The FEP must give the participant 7 working days from the date the good cause request is made to provide the written documentation. The FEP must document in PIN comments using the **Good Cause Determination** Comment Type why the written documentation verifying good cause is required.

FEPs must not penalize participants when they attempt to obtain the written verification and other entities delay their ability to obtain the necessary documents. If the individual does not have the power to produce verification, or if circumstances exist that make the verification requirements unduly burdensome, the W-2 agency must assist the participant in obtaining the necessary documents and the FEP must extend the verification due date. The verification due date may be extended for up to 30 calendar days from the date the good cause verification request is made. In some instances, the W-2 agency may seek the verification directly. (See [4.1.3](#))

The verification due date cannot be extended from 7 to 30 days at the point when the participant receives ~~CARES~~ CWW letter NWSN, which informs participants of a 20% payment reduction. In these circumstances, the nonparticipation has occurred, the participant has had the opportunity to request good cause (within 7 working days of the nonparticipation) and provide any necessary verification of that good cause (within 7 working days of the request for verification, unless extended to up to 30 calendar days). The NWSN letter is sent and it provides a final, but narrow opportunity for the participant to provide good cause for the past nonparticipation.

11.3.1 Rectifying 20% Payment Reductions

W-2 policy requires FEPs to conduct ongoing informal assessments, which includes the need to discuss with the participant any underlying causes of nonparticipation to identify any barriers that might exist and take steps to address those barriers. (See [11.1.1](#) and [Chapter 5](#)) In addition to working with participants to identify potential barriers, if a participant's payment is going to be reduced by 20% or more, the W-2 agency must:

1. Provide written notice to the W-2 participant of the proposed 20% or more payment reduction and of the reasons for the proposed payment reduction (see 11.3.1.1); and
2. Allow the participant reasonable time to rectify the deficiency, failure or other behavior to avoid the proposed W-2 payment reduction. To rectify means that the participant is given one last opportunity to present good cause for nonparticipation or to present late documentation of completed assigned activities.

~~CARES CWW~~ automatically generates the *Notice of Potential W-2 Payment Reduction* (~~CWAW~~ letter NWSN) either at the beginning (W-2 delayed payment) or the end of the month (W-2 pulldown) when final W-2 monthly payment amounts are determined.

~~CARES CWW~~ populates the letter with information that the FEP enters in participation tracking in WWP on CARES screen WPNP: the missed activities, the hours missed, and the dates the activities were missed. The letter informs the participant to contact the worker as soon as he or she receives the letter to explain why the activities were missed. If the participant is claiming good cause, the FEP determines whether the reason for the missed hours meets any of the good cause reasons and whether to require written verification of good cause (called “proof of good cause” in the letter).

If the participant is submitting late documentation of completed assigned activities, the documentation must be for the dates that the activity was assigned on the Employability Plan.

Because the participant may have to provide written verification, the letter includes the date by which the verification must be provided, if required by the FEP. The participant is given 7 working days to provide written verification of good cause. The next working day after the mailing date of the letter is day 1. For example, if the mailing date of the letter is Tuesday, September 18, 2018, the date by which the individual needs to provide written verification is Wednesday, September 27, 2018. The verification due date cannot be extended from 7 working days to 30 days. (See [11.2.4](#)) The date provided on NWSN is the final date any verification can be received.

~~11.3.1.1 20% Reduction Reports~~

~~In order to assist the W-2 agencies in identifying participants that must be notified of a 20% or more payment reduction, three Web Intelligence (WEBI) reports are located in the “DCF/WISDOM/Employment Programs/W-2 Financial Data/W-2 Benefits” folder.~~

- ~~☒ The first report is the W-2 Cases with 20% or More Benefit Reduction – 1st of the Month Report, which runs on the 1st of each month. This report identifies those participants who, as of the 1st of the month, appear to be on track to have their W-2 payment reduced by 20% or more.~~
- ~~☒ The second report is the “W-2 Cases with 20% or More Benefit Reduction – 16th of the Month Report,” which runs on the 16th of each month. This report identifies those~~

~~participants who, as of the 16th of the month, appear to be on track to have their W-2 payment reduced by 20% or more.~~

- ~~☒ The third report is the “W-2 Cases with 20% or More Benefit Reduction – At W-2 Pulldown Report,” which runs the same night as W2P. Those individuals who appear for the first time on the W-2 Pulldown report have had their payments reduced, but still need to be notified and given a chance to provide good cause.~~

~~There is one major difference between the three reports. On the 1st and 16th of the Month reports, the percent reduction is calculated by multiplying the sanctionable hours (Sctn Hrs) column by the hourly rate (Hourly Rate) column in order to get the hourly reduction (Hourly Reduction) column. That number is then divided by the gross W-2 payment (Gross W-2 Pymt) column.~~

~~On the W-2 Pulldown report, the percent reduction is calculated by multiplying the applied hours (Applied Hrs) column by the hourly rate (Hourly Rate) column in order to get the total hourly reduction (Hourly Reduction) column. That number is then divided by the gross W-2 payment (Gross W-2 Pymt) column.~~

~~The reason sanctionable hours are used for the 1st and 16th of the Month reports and applied hours for the W-2 Pulldown report is due to screen WPMA. On WPMA, while sanctionable hours roll up as nonparticipation hours are entered, applied hours are only calculated during the monthly W2P. For that reason, applied hours (Applied Hrs) will always be 0 on the 1st and 16th of the Month reports.~~

~~If the placement type in the placement (Plcm) column is CMC, it may indicate that the participant’s placement was changed from CMC to another paid placement type, but the worker did not run eligibility with dates. When these CMCs appear on the report, agency staff must follow up to correct the mistake.~~

~~For those participants that appear on the 1st and 16th of the Month reports, good cause can be entered on CARES screen WPNP in enough time to adjust the final W-2 monthly payment amount. However, for those participants appearing for the first time on the W-2 Pulldown report, due to the CARES payment issuance cycles, FEPs will be unable to change the final W-2 monthly payment amount. Therefore, if the deficiency, failure or other behavior that caused the payment reduction is rectified for those participants appearing for the first time on the W-2 Pulldown report, the FEP must initiate an auxiliary payment in order to supplement the payment amount.~~

11.4.2.1 Exploring Potential Barriers

W-2 informal assessment policy requires FEPs to conduct ongoing informal assessments, which includes the need to discuss with the participant any underlying causes of noncooperation. (See [Chapter 5](#)) The FEP must explore potential barriers that may be interfering with a participant’s ability to cooperate and take steps to address those barriers prior to closing a W-2 case for noncooperation reasons.

Before closing a case for noncooperation, the FEP has a responsibility to:

1. **Initiate action to uncover why the participant has not completed the required activity in the event that unidentified barriers exist.** FEPs must document thoroughly in PIN comments as well as on the appropriate CARES screens and *WWP* pages actions taken to uncover barriers that may be contributing to the noncooperation or other good cause reasons for failing to cooperate.

No change to the remainder of 11.4.2.1

11.4.2.2 Rectifying Noncooperation Prior to Case Closure

In addition to exploring potential barriers, if a participant's case is going to close for noncooperation, the W-2 agency must:

1. Provide written notice to the W-2 participant of the proposed case closure and the reason for the case closure; and
2. Allow the participant reasonable time to rectify the deficiency, failure or other behavior to avoid the proposed W-2 payment reduction. Rectifying means that the participant is given one last opportunity to present good cause for failing to cooperate or to present late documentation of completed assigned activities.

The FEP must issue the *Notice of Noncooperation with W-2 Requirements* (*CWW* letter NWNC) and must give the participant one last opportunity to present good cause for failing to cooperate.

The FEP must manually issue NWNC via CWW prior to generating a Notice of Eligibility. The FEP must mark the correct noncooperation reason on NWNC and enter the date of noncooperation (see [11.4.2.1](#)). The letter informs the participant to contact the worker as soon as he or she receives it to explain why the noncooperation occurred. If the participant is claiming good cause, the FEP determines whether the reason for the noncooperation meets any of the good cause reasons and whether to require written verification of good cause (called "proof of good cause" in the letter). (See [11.2.2](#))

Because the participant may have to provide written verification, the letter includes the date by which the verification would need to be provided, if necessary. The participant is given 7 working days to provide written verification of good cause. The next working day after the mailing date is day 1. For example, if the mailing date of the letter is Friday, October 12, 2018 the date by which the individual needs to provide written verification is Tuesday, October 23, 2018. The verification due date cannot be extended from 7 working days to 30 days. (See [11.2.4.2](#)) The date provided on NWNC is the final date any verification can be received.

If the participant is submitting late documentation of completed assigned activities, the documentation must be for the dates that the activity was assigned on the Employability Plan.

In the case of a missed EP review appointment, the individual must be allowed to make the appointment up within the 7 working days from the date of the CWW letter NWNC. It is assumed in this scenario that the participant missed an EP review update appointment that was scheduled prior to the expiration. The written notice will instruct the participant to contact the worker to reschedule. If the participant calls, the W-2 agency must re-schedule the EP meeting. NWNC informs the participant that if the participant does not appear for the re-scheduled appointment, the case will close unless good cause for the missed appointment exists. In order for the agency to reschedule a missed EP review appointment, the participant does not have to have had good cause for missing the first EP review appointment.

No change to the remainder of 11.4.2.2

11.6.2.1 Determining the Date of Refusal to Participate

The date of refusal to participate is the date that the participant demonstrated the refusal to participate.

EXAMPLE 1: The W-2 agency arranges an interview for a participant with an employer on March 18, 2018, and the participant was a no-call, no-show to the interview. On March 22, 2018, the FEP learns that the participant did not show for the interview. The date of refusal to participate is March 18, 2018.

EXAMPLE 2: A participant fails to participate in assigned activities and the May 2018 and June 2018 W-2 payments are reduced by 20% or more for two consecutive months. At W-2 Pulldown, CARES CWW issues CARES letter NWSN to the participant with a good cause due date of June 6, 2018. The participant does not submit good cause by June 6, 2018. The date of refusal to participate is June 6, 2018, the final date that any good cause can be received for 20% or more payment reduction.

14.4.1 Payment Reductions for Nonparticipation in W-2 Two-Parent Households

Hourly payment reductions (also known as sanctions) only apply to the placed parent in a W-2 two-parent household. (See 11.1) ~~The FEP must not apply an hourly payment reduction when the second parent in a W-2 two-parent household misses required W-2 activities, regardless of whether the household is receiving Wisconsin Shares. However, w~~ When the second parent is required to participate in W-2 activities, the FEP must create a separate EP for the second parent, enter hours participated (including make-up hours), and determine whether there is good cause for any nonparticipation the second parent's missed hours of participation and enter that good cause determination. The good cause determination is important because it may be used

by the Wisconsin Shares child care program to determine if the second parent's nonparticipation will affect Wisconsin Shares eligibility.

If either parent in a W-2 two-parent household misses W-2 activities without good cause and these activities are required for Wisconsin Shares eligibility, the family's eligibility for Wisconsin Shares may be affected. (See [Wisconsin Shares Child Care Subsidy Policy Manual](#))

Appendix - Activity Codes

Definitions and Codes for Work Program Activities in CARES

Only activity codes with edits are listed below

CD – Caring for Disabled Child

~~Valid for the following programs: W-2~~

~~Report this W-2 activity for the hours of care provided by a participant for a dependent child with a disability or incapacitation. Documentation of the need for the participant to be the sole provider of care must be provided by using the form *Need to Care for Disabled Family Member (10786)* or an agency-developed form that, at a minimum, has the same elements. (See 7.4.2.1 #2) This code should not be used for CMC participants.~~

~~**For Federal Work Participation:** Reporting this activity for a participant will exclude that case from Federal Work Participation calculations.~~

CF – Caring for Other Disabled Family Member

~~Valid for the following programs: W-2~~

~~Report this W-2 activity for the hours of care provided by a participant for a W-2 Group member with a disability or incapacitation other than a child or care of a foster child. Documentation of the need for the participant to be the sole provider of care must be provided by using the form *Need to Care for Disabled Family Member (10786)* or an agency-developed form that, at a minimum, has the same elements. (See 7.4.2.1 #2).~~

~~**For Federal Work Participation:** Reporting this activity for a participant will exclude that case from Federal Work Participation calculations.~~

EC – Child Care for Employment Skills Training (2 Year)

~~Valid for the following programs: W-2~~

~~Report this activity for tracking when a W-2 participant is receiving up to two years of FEP authorized child care to enable the participant to engage in voluntary educational and training activities.~~

EI – Employer Intervention Services

~~Valid for the following programs: W-2, LF, CF~~

~~Report this service when it is directed at the employer to facilitate the resolution of job retention barriers faced by the participant. These services could include:~~

- ~~enhancing communication channels between the employer and participant,~~
- ~~employer counseling,~~
- ~~suggesting acceptable work-site accommodations, and~~
- ~~other on-site interventions with the employer on behalf of the participant.~~

~~The length of the service should reflect the time working with the employer.~~

~~*For W-2: This activity is used to record and track employer intervention services provided by the W-2 agency. To record employment retention activities required by the participant, use the Job Retention Services (JR) activity code.*~~

~~*For Federal Work Participation: This activity is not counted for Federal Work Participation requirements.*~~

SD – SS(D)I Advocacy/Application

~~Valid for the following programs: W-2~~

~~Report this activity when the W-2 participant is in the process of obtaining SSI or SSDI and the W-2 agency or another provider is providing related services. Examples include meeting with an SSI advocate or attorney, working with the FEP on filling out the SSI forms, attending hearings, etc.~~

~~Note: No hours of participation are reported with this activity. It is entered for tracking purposes.~~