



TO: **W-2 Agencies
Training Staff**

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BWF/BRP OPERATIONS MEMO

No: 21-21

DATE: 08/13/2021

W-2 ☒ EA ☒ CF ☐ JAL ☒

RAP ☒ TMJ ☒ TJ ☒ Other EP ☐

SUBJECT: *Updates to COVID-19 Best Available Information Policy*

CROSS REFERENCE:

[BWF Operations Memo 20-07](#)
[W-2 Manual Section 4.1.2 Information Requiring Eligibility Verification](#)
[W-2 Manual Section 4.1.3 Requesting Verification from W-2 Participants](#)
[EA Manual 4.2 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](#)
[BWF Work Programs Help Desk Email July 9, 2021 – Best Information Available Policy And SWICA](#)

EFFECTIVE DATE: Immediately

PURPOSE

The purpose of this memo is to describe updates to the temporary COVID-19 Best Available Information policy that was implemented with [BWF Operations Memo 20-07](#).

BACKGROUND

Due to the COVID-19 pandemic and widespread temporary and permanent business closures, the Bureau of Working Families (BWF) adjusted verification policy found in W-2 Policy [4.1.2](#) and

[4.1.3](#) to temporarily allow agencies to accept the best available information that applicants/participants can provide as verification for certain eligibility items.

This policy adjustment applied to the Wisconsin Works (W-2), Emergency Assistance (EA), Job Access Loan (JAL), Transform Milwaukee Jobs and Transitional Jobs (TMJ/TJ), and the Refugee Cash Assistance (RCA) programs. To support this temporary policy, a new verification code, C9-COVID 19, was added to CARES Worker Web (CWW).

POLICY

TEMPORARY POLICY

Verification policies for W-2, TJ/TMJ, JAL, EA, and RCA were adjusted to allow agencies to accept the best information available from the applicant or participant as verification for certain program eligibility items. See [BWF Operations Memo 20-07: COVID-19 Temporary Adjustment of Verification Policy: Use of Best Available Information](#) for a full description of the temporary policy and a complete list of eligibility items for all affected programs.

UPDATED POLICY

As first announced in a [BWF Work Programs Help Desk communication](#) published July 9, 2021, effective July 19, 2021, Financial and Employment Planners (FEPs) must start pending for verification for mandatory or questionable verification items when appropriate. If verification is not received by the due date and the applicant or participant has not attempted to contact the agency for assistance, the FEP must close/deny the case for lack of verification.

If an applicant or participant contacts the agency and states they are unable to obtain the requested verification, FEPs must discuss the reason the verification cannot be obtained. If the applicant or participant is unable to obtain the verification due to a COVID-19 related reason, the FEP must make an attempt to obtain verification. If the FEP is also unable to obtain verification, the FEP must then use the C9 verification code in CWW to indicate applicant or participant-reported information has been used as best available information and re-determine eligibility.

FEPs must leave detailed case comments stating that both they and the applicant or participant were unable to obtain verification and used the temporary COVID-19 best available information policy to open/confirm eligibility for the case.

If the applicant or participant is unable to obtain the verification for any other reason not related to COVID-19, the FEP must review and apply existing policy found in [W-2 Policy Manual 4.1.3](#).

EXAMPLE: Mary applies for W-2 on June 30, 2021, and her verification is due seven working days later, on July 9, 2021. On July 8, Mary calls her FEP and states that she cannot obtain verification of her income. The FEP discusses this with Mary and Mary states that her bank is closed due to COVID and the next closest branch is two hours away by car, which she does not have. She also does not have access to online banking to verify her income. The FEP attempts to obtain verification but is unable because of the bank closure. The FEP must use C9 as the verification code for earned income in CWW and leave a detailed case comment explaining that the best available information policy has been used to open Mary's W-2 case.

Note: Agencies are not expected to search for cases that currently have a C9 code entered and pend for verification. FEPs must only take action if they find cases with the C9 code during six-month reviews, change reports, etc., and pend for verification at that time.

CARES WORKER WEB (CWW)

The temporary C9-COVID 19 verification code passes eligibility for W-2 and JAL, Child Care, Healthcare, and Food Share for programs that share these fields and will remain available in CWW until the end of the federally declared Public Health Emergency.

AGENCY ACTION

W-2 agencies must familiarize staff with this updated policy as described in this memo and update any relevant local agency procedures.

CONTACTS

For W-2 and Refugee Program Policy Questions: [BWF Policy Question SharePoint](#)

For W-2, CARES and WWP Functionality Questions: BWF Work Programs Help Desk
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DCF/DFES/BWF/MO