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2.10.1 Introduction to Time Limits

Time limits stress mutual responsibility: the *W-2* program provides services designed to promote employment while participants are expected to prepare for and enter employment. The purpose of the time limits and case management practices is to encourage participants to make consistent progress towards their employment goals. ~~encouraging immediate engagement is to ensure participants make progress as quickly as possible toward work in unsubsidized employment.~~ *W-2* eligibility has a state lifetime limit of ~~60~~48 months. Participation in a *W-2* employment position (*TEMP*, *CSJ*, and *W-2 T*) is limited to 24 months. The goal of *W-2* participation is to help participants reach their employment and earnings goals and support economic self-sufficiency. ~~raise participants' employment rates and earnings and reduce reliance on government programs.~~

2.10.2 State ~~60~~48-Month Lifetime Limit

[2.10.2.1 W-2 Group Limit](#)

[2.10.2.2 Native American Exemptions](#)

[2.10.2.3 TANF Received in Another State](#)

[2.10.2.3.1 TANF Received in Another State and Time Limit Extensions](#)

The ~~60~~48-month state lifetime limit is the cumulative total of the number of months the individual or any adult member of the individual's *W-2 Group* has participated in, or has received benefits under, any of the following or any combination of the following:

1. A *W-2 Employment Position* at any time during a month, including *TEMP*, *CSJ*, or *W-2 T*, even if the payment was reduced to \$0.
2. Any *TANF* funded program in this state or any other state for which the participant received *TANF* cash assistance while in that program. (See 2.10.2.3) This includes Tribal *TANF* funds and some months in a *CMC* placement. (See 2.10.8)
3. The *AFDC JOBS* program from October 1, 1996, to *W-2* implementation in September 1997. See Appendix - *AFDC Overview* for specific guidelines.

Months of participation in the *CMF+* placement where a monthly \$50 supplemental payment is received do not count towards the state ~~60~~48-month lifetime limit.

2.10.2.1 W-2 Group Limit

The ~~60~~48-month state lifetime limit applies to all adults in the *W-2 Group*. Any month during which any adult in the *W-2 Group* participates in a *W-2 Employment Position* counts towards the individual's ~~60~~48-month state lifetime limit for both the parent in the placement and the non-placed parent. This includes second parents, stepparents, adult *SSI/SSDI* recipients, and *Non-marital Co-parents*. Some of these parents are exempt from counting towards the 60-month federal lifetime limit. (See 2.10.9) In *W-2 Groups* with more than one

adult member, the adult member with the greatest number of months accumulated counts toward the W-2 Group's 6048-month state lifetime limit.

Individuals entering a W-2 Group raise the W-2 Group's cumulative number of months, if the new member has accumulated more months than the primary individual.

Individuals leaving a W-2 Group take with them the number of months accumulated prior to entering the W-2 Group as well as the number of months accumulated while a part of the W-2 Group.

EXAMPLE 1: Mary is in a W-2 Group consisting of herself and her 4-year-old daughter. She has accumulated 30 months towards her 6048-month state lifetime limit. Because she is the only adult in the W-2 Group, the W-2 Group is credited with 30 months toward the 6048-month state lifetime limit. John, Mary's estranged husband, joins the W-2 Group. John has accumulated 35 months toward his 6048-month state lifetime limit prior to moving back in with Mary. Because John has the greater number of months accumulated towards the state lifetime limit, the W-2 Group is now credited with 35 months towards the state lifetime limit.

EXAMPLE 2: After ten months, John moves out of the home and the W-2 Group once again consists of Mary and her daughter. At the time John left the W-2 Group, he and Mary had used an additional 10 months toward the 6048-month state lifetime limit reaching a total of 45 months (35 + 10). Because Mary had 30 months accumulated toward the 6048-month state lifetime limit when John moved in and she accumulated ten more months during the time she and John lived together, the W-2 Group of Mary and her daughter is credited with 40 months towards the state lifetime limit. John has accumulated 45 months towards the state lifetime limit.

Dependent 18-year-olds are considered to be children in the W-2 Group and are not subject to time limits. Once a dependent 18-year-old turns 19 or graduates from school, the individual becomes an *Excluded Adult* and is no longer included in the W-2 Group. If the dependent 18-year-old has a *Dependent Child* and applies for services independent of his or her parents, he or she would then be eligible for W-2 with the dependent child as their own W-2 Group and subject to the 6048-month state lifetime limit.

2.10.2.2 Native American Exemptions

Any adult in the *W-2 Group* is exempt from the 6048-month state lifetime limit while living in a federally recognized American Indian reservation, an Alaskan Native village, or an Indian country occupied by an Indian tribe for a month, if during that month the following applied:

1. At least 1,000 individuals were living on the reservation or in the village or Indian country; and

2. At least 50 percent of the adults were unemployed.

2.10.2.3 TANF Received in Another State

In Wisconsin, TANF months accumulated in other states also count toward the 6048-month state lifetime limit.

When there is evidence that an applicant has received TANF cash assistance in another state, the *FEP* must:

1. Determine the number of months TANF cash assistance was received in the other state by contacting the appropriate persons. Only months of TANF cash assistance received after September 1, 1996, can be counted. If the contact cannot confirm that the assistance received in the other state was TANF, do not use the information. The months of TANF cash assistance received in the other state does not have to be verified in writing.
2. Enter the month and years that TANF was received in the other state in the Time Limit Tracking application as OTF-Benefits from Another State. In the details field, the FEP must indicate the date verified and any other relevant information.

EXAMPLE: Annabelle moves to Wisconsin from Illinois and applies for W-2. When the FEP contacts Illinois, the case worker confirms that Annabelle received TANF benefits for 24 months in Illinois. If Annabelle is found eligible for W-2, Annabelle will start in W-2 with 24 months accumulated toward her Wisconsin 6048-month state lifetime limit.

2.10.2.3.1 TANF Received in Another State and Time Limit Extensions

If an individual who has received more than 6048 months of TANF assistance in another state is eligible for W-2, but has used 6048-months on his or her state lifetime limit, the FEP *must* determine eligibility for a state lifetime limit extension based on the time limit extension criteria at application.

When applying the time limit extension criteria, the FEP must use information obtained during the W-2 informal assessment. In addition, the FEP must attempt to contact the other state for more specific information about the applicant. If the FEP is unable to obtain additional information, the information gathered through the informal assessment must be used to determine eligibility for a time limit extension.

(See 2.10.6 for more information on time limit extensions.)

2.10.3 24-Month Employment Position Time Limits

No changes needed

2.10.3.1 Restoring 24-Month Time Limits

The 2009-2011 Biennial Budget (2009 Wisconsin Act 28) eliminated the 24-month placement time limit for Trial Jobs, CSJ, and W-2 T employment positions, and, in some instances, CMC placements effective October 30, 2009.

The 2011-2013 Biennial Budget (2011 Wisconsin Act 32) restored the 24-month placement time limit for Trial Jobs, CSJ, W-2 T, and, in some instances, CMC placements effective January 1, 2012. The restored language is the same language that was eliminated under 2009 Wisconsin Act 28.

For a 26-month time period (November 2009 through December 2011), there were no 24-month employment position placement time limits. However, while the 24-month placement time limit was eliminated during this time period, the Department of Children and Families continued to count months that participants accumulated in these W-2 employment positions for both federal and state time limits (as applicable) in CARES WWP and displays this count in the Time Limit Tracking module application under the category of NO24.

2.10.4 Time Limit Notifications to Participants

W-2 applicants and participants must be made aware that *W-2 Employment Position* payments are time-limited. ~~FEPs must create a sense of urgency and finality surrounding time limits when communicating this message to participants.~~ Conversations with individuals in paid placements must promote full engagement to increase participants' employability and motivate support the participant to develop skills that will allow them to enter the local labor market ~~well before reaching the time limit.~~

FEPs can reinforce the necessity of meeting employment goals within the time limits of the W-2 program by ensuring frequent communication about time limit status. At a minimum, the FEP must go over the participant's time limit status at every eligibility review, employability plan review, and when assigning participants to a new paid placement. Discussions about time limits can vary on a case-by case basis according to the participant's needs and whether the individual is in a paid placement.

For individuals in the CMD (case management denied) placement, policy requires that the FEP reassess monthly to see if the individual is appropriate for a time limit extension (see 2.10.6.5.1).

Time limit information is also included on Notices of Eligibility when eligibility reviews are completed.

2.10.5 Subtracting Months of Eligibility

The *FEP* must adjust an individual's time limit by subtracting the entire month of participation in the Time Limit Tracking module application in WWP in the following situations:

1. If a participant voluntarily returns the full amount of a *CSJ* or *W-2 T* payment within 1 year of the payment issuance date. The refund can be made in cash, by personal check, money order, or by returning the issued payment. If the voluntarily returned payment is from a *W-2 Paid Employment Position* participant who is sanctioned, see 2.10.9.1 for changing the Federal Indicator in the Time Limit Tracking module Application in WWP.
2. If a *W-2* payment is returned to the agency due to an undeliverable address and the participant does not pick up the check within 30 days.
3. If a participant repays in full payments received from an overpayment caused by agency error or inadvertent participant error. When the entire overpayment is repaid, those months of eligibility must be restored. See 2.10.9 for cases of *IPV*, sanctioned participation, or fraud.
4. If a *TEMP* employer does not request a *TEMP* subsidy for a month of employment.

There are times when a month of participation will count toward an individual's ~~6048~~ 6048-month state lifetime limit and 24-month placement time limit, but the *FEP* must adjust the Federal Indicator so the month does not count toward the federal lifetime limit. (See 2.10.9.1 for changing the Federal Indicator in the Time Limit Tracking module application in WWP)

See 2.10.2.3 for adding month of eligibility when *TANF* is received from another state.

2.10.6 Time Limit Extensions

[2.10.6.1 24-Month Time Limit Extension Criteria](#)

[2.10.6.2 State ~~6048~~-Month Time Limit Extension Criteria](#)

[2.10.6.3 Local Labor Market Conditions Criteria](#)

[2.10.6.4 Time Limit Extension Decision Process](#)

[2.10.6.4.1 Processing Initial Time Limit Extensions](#)

[2.10.6.4.2 Processing Subsequent Time Limit Extensions](#)

[2.10.6.4.3 Reaching 24-month and ~~6048~~-month Time Limits Concurrently](#)

[2.10.6.5 Time Limit Extension Decisions and Assessment](#)

[2.10.6.5.1 CMD Placements](#)

[2.10.6.5.2 Case Management Practices and Time Limit Extension Approvals](#)

There may be opportunities for time limit extensions of the 24-month placement time limits and ~~6048~~ 6048-month state lifetime limits for *TEMP*, *CSJ*, *W-2 T*, and *CMC* participants. The *W-2*

agencies must work intensively with participants prior to and during time limit extension periods to help the participant overcome barriers or challenges.

For information on time limit extensions for CMC participants, see 2.10.8.2.

For the purposes of this section:

"Reasonable unsubsidized employment opportunity" means a job the participant could get that pays at least minimum wage and conforms to all applicable federal and state laws.

Making "all appropriate efforts to find unsubsidized employment" means that the participant has participated in all assigned activities.

2.10.6.1 24-Month Time Limit Extension Criteria

No changes needed

2.10.6.2 State ~~48~~ 60-Month Time Limit Extension Criteria

All time limit extension decisions must be made on a case-by-case basis. In determining whether to extend the ~~48~~ 60-month state lifetime limit, the W-2 agency must determine whether the participant meets at least one of the following ~~48~~ 60-month state lifetime limit extension criteria:

1. The participant has made all appropriate efforts to find unsubsidized employment and has been unable to do so because the local labor market conditions preclude a reasonable unsubsidized employment opportunity for that participant. In order to approve a time limit extension based on local labor market conditions, the agency must demonstrate or document any one of the following circumstances:
 - a. The inability of W-2 participants with similar skills or engaged in job searches in similar geographic and occupational areas, to find unsubsidized jobs.
 - b. The unavailability of jobs in labor market sectors that match the individual's skills, as supported by specific examples of layoffs in these labor market sectors or by labor market data published by the Department of Workforce Development or the United States Department of Labor.
 - c. The unavailability of jobs in the labor market within a reasonable distance and travel time of the individual's home, as supported by specific examples of layoffs in this labor market or by labor market data published by the Department of Workforce Development or the United States Bureau of Labor Statistics.
2. The participant is unable to work because of a personal disability or incapacitation ~~which prevents the individual from temporarily or permanently obtaining or maintaining full-time unsubsidized employment or advancing to a higher W-2 Employment Position.~~

Examples include: physical, mental health, and cognitive limitations, learning disabilities, domestic abuse, and substance abuse.

3. The participant is unable to work because of a need to remain at home to care for a member of the *W-2 Group* whose incapacity is so severe that without in-home care provided by the W-2 participant, ~~the incapacitated W-2 Group member's~~ the health and well-being of the W-2 group member would be significantly affected.
4. The participant has significant limitations to employment such as low achievement ability, learning disability, or emotional problems of such severity that they prevent the individual from obtaining or retaining unsubsidized employment, but are not sufficient to meet *SSDI* or *SSI* requirements.
5. The participant has significant limitations to employment such as family problems that affect one of the members of the W-2 Group.

Examples including: legal problems, family crises, homelessness, ~~domestic abuse,~~ or children's school or medical activities.

6. The individual is unable to work to due to current participation in a substance abuse treatment program certified to provide treatment for substance abuse under ss. DHS 75.10 to 75.15 or psychosocial rehabilitation services as approved by the department.

7. The individual's W-2 group includes a member who has been battered or subjected to extreme cruelty based on the fact that the member has been subjected to any of the following:

- Physical acts that resulted in, or threatened to result in, physical injury to the individual.
- Sexual abuse.
- Sexual activity involving a dependent child.
- Being forced as the caretaker relative of a dependent child to engage in nonconsensual sexual acts or activities.
- Threats of, or attempts at, physical or sexual abuse.
- Mental abuse.
- Neglect or deprivation of medical care.

See 2.10.6.3 for documentation required to approve a ~~6048~~-month state lifetime limit extension for criteria 1. A valid formal assessment must have been completed to approve a ~~6048~~-month state lifetime limit extension for criteria 2, 3, and 4 above. In order to approve a ~~6048~~-month state lifetime limit extension for criteria 5, the agency must have valid documentation.

Valid documentation for criteria 5 must reflect current circumstances. This includes:

- Court, medical, criminal, child protective services, social services, psychological, school social worker, school guidance counselor or law enforcement records regarding legal problems, family crisis, homelessness, children's school or

- medical activities, or domestic abuse or physical or emotional harm to the parent or child;
- Voluntary disclosure or identification by the Domestic Abuse Screen that the applicant or participant or group member has been a victim of domestic abuse or is at further risk of domestic abuse;
 - Written and signed statements from others with knowledge of the circumstances on which the family problems hardship claim is based, including, but not limited to, statements from public or private social services agencies providing services to the W-2 group, school counselors, domestic violence or homeless shelter service providers, attorneys, etc.;
 - Written statement by the applicant or participant; or
 - Any other supporting or corroborative documentation, including formal assessments. (See 5.5 for more information on valid formal assessments.)

If the individual does not have a verified barrier, limitation, or family problem as required above or is not participating in all assigned activities, the *FEP* may deny a ~~60~~48-month state lifetime limit extension.

2.10.6.3 Local Labor Market Conditions Criteria

A W-2 agency may provide a 24-month placement time limit extension or a ~~60~~48-month state lifetime limit extension on a case-by-case basis if that agency determines that a participant's appropriate efforts to find unsubsidized employment have been unsuccessful because local labor market conditions preclude such employment for that participant.

Local Labor Market Time Limit Extension Approvals

In order to approve a time limit extension based on local labor market conditions, the agency must demonstrate or document any one of the following circumstances:

- As supported by specific examples, the inability of other W-2 participants with similar skills, or engaged in job searches in similar geographic and occupational areas, to find unsubsidized jobs;
- ~~As supported by specific examples, the loss, due to employer closures or cutbacks, of sites on which the agency has historically relied to place W-2 participants in unsubsidized employment;~~
- As supported by published labor market data or by specific examples of closures or cutbacks, a local downturn or continuing unavailability of jobs in the labor market sectors matching participant skills; or
- As supported by published labor market data or by specific examples of closures or cutbacks, a local downturn or continuing unavailability of jobs in the labor market within reasonable participant travel time (no more than 60 minutes travel time one-way, using available transportation, from the participant's home to the employer, including travel time related to any necessary child care).

This documentation may include case histories of other comparable participants (with any personally identifiable information removed), press coverage regarding the local job market or local business conditions, agency correspondence with historical or potential placement sites, current labor market data obtained from public or private sources, or products of current locally relevant labor market studies or research.

If the agency approves an extension based on local labor market conditions, FEPs should conduct assessments, including *Career Assessments*, with the participant and create an *EP* with assigned activities that focuses on training to build skills demanded by the local labor market.

2.10.6.4 Time Limit Extension Decision Process

W-2 agencies have decision-making authority for all time limit extension approvals and denials.

2.10.6.4.1 Processing Initial Time Limit Extensions

A discussion between the FEP and the participant regarding a time limit extension must take place no later than the month WWP displays 18 for the ~~the 18th month of the 24-~~ month placement time limit and the month WWP displays 42 ~~54th month of the 60-month for the 48-month~~ state lifetime limit. If a person applies for W-2 with more than 18 months on a 24-month placement time limit or ~~54~~ 42 months on the ~~60~~ 48-month state lifetime limit, the discussion must take place at application. When determining eligibility for an initial time limit extension, the FEP must complete the *W-2 Agency Time Limit Extension Approval Record (5214)* or the *W-2 Agency Time Limit Extension Denial Record (5215)* form that corresponds with the decision. One copy of the form must be scanned into *ECF* and one copy given to the participant. ~~In addition,~~

The FEP must enter the time limit extension decision in the Time Limit Tracking module no later than the end of the month WWP displays 20th month ~~for the 24-month placement time limit and the end of the month WWP displays 44~~ ~~56th month for the 60~~ 48-month state lifetime limit, unless the application is received after WWP displays 20 or 44 months used, ~~the 20th month or 56th month~~ respectively. A time limit extension may be granted for 6 months from the first day following the participant's 24th month and 6 months from the first day following the participant's ~~60~~ 48th month.

For those participants who have been denied or who have declined a time limit extension, the FEP must continue to work with the participant in the period of time before his or her W-2 case closes to determine if circumstances have changed that would result in the need for a time limit extension.

2.10.6.4.2 Processing Subsequent Time Limit Extensions

After an initial 24-month placement time limit or ~~6048~~-month state lifetime limit extension approval is granted, the W-2 agency can determine that a subsequent time limit extension period is necessary. There is no limit to the number of subsequent time limit extensions a participant may receive. A discussion regarding subsequent extensions must occur no later than the third month of the extension. When determining eligibility for a subsequent time limit extension, the FEP must complete the *W-2 Agency Time Limit Extension Approval Record (5214)* or the *W-2 Agency Time Limit Extension Denial Record (5215)* form that corresponds with the decision. One copy of the form must be scanned into ECF and one copy given to the participant. The subsequent time limit extension decision must also be entered in the Time Limit Tracking module no later than the month prior to the current time limit extension end month.

If the agency approves a subsequent extension, activity assignment should reflect assessment results, local labor market information, and anticipated time to work readiness or referral to other programs.

2.10.6.4.3 Reaching 24-month and ~~6048~~-month Time Limits Concurrently

If a participant is going to reach ~~his or her~~ their 24th month in a TEMP, CSJ, or W-2 T, or the end of a 24-month placement time limit extension, 6 months prior to reaching the ~~6048~~-month state lifetime limit, the FEP must determine eligibility for a ~~6048~~-month state lifetime limit extension rather than a 24-month placement time limit extension. The FEP must then enter the ~~6048~~-month state lifetime limit extension information into the Time Limit Tracking module prior to the end of the participant's 24th month or the end of a 24-month placement time limit extension.

EXAMPLE: Mary will reach her 24th month in a CSJ on July 29. Upon reviewing the participant's time limit history in preparation for the time limit discussion with the participant, the FEP sees that the participant will reach her ~~6048~~th month on her state lifetime limit on October 31. Because the participant will reach ~~6048~~ months 3 months after reaching her 24th month, the FEP determines eligibility for a ~~6048~~-month state lifetime limit extension and enters the ~~6048~~-month state lifetime limit extension approval by July 29. This extends both the 24-month placement time limit as well as the ~~6048~~-month state lifetime limit. Any subsequent time limit extensions will be made to the ~~6048~~-month state lifetime limit.

2.10.6.5 Time Limit Extension Decisions and Assessment

The *FEP* must complete and submit the *WWP* Informal Assessment Driver Flow if an initial 24-month placement time limit or ~~6048~~-month state lifetime limit extension is going to be denied and the *WWP* Informal Assessment Driver flow has not been completed within 12 calendar months prior to the participant's 24th or ~~60th~~48th month. The FEP cannot deny a time limit extension until the *WWP* Informal Assessment Driver Flow is completed and submitted.

If the WWP Informal Assessment indicates the need for a formal assessment, a time limit extension cannot be denied until the formal assessment is complete.

2.10.6.5.1 CMD Placements

When a participant is denied a time limit extension or the participant declines a time limit extension for either the 24-month placement time limit or ~~60~~48-month state lifetime limit, the FEP must offer the *CMD* placement. The *CMD* placement is a case management placement for individuals who have reached their time limit and are no longer eligible for a paid placement.

The goals of the *CMD* placement are to:

- Help connect the individual to employment;
- Connect the individual and family to services in the community; and
- Reassess on a monthly basis whether the individual should receive a time limit extension.

To be eligible for the *CMD* placement, the participant must meet *W-2* financial and nonfinancial eligibility criteria, with the exception of exceeding the 24-month placement time limit or ~~60~~48-month state lifetime limit.

Services provided to a *CMD* participant will depend largely upon the reason for the time limit extension denial or the reason the participant declined a time limit extension and the placement the individual was in at the time of the denial or the time the participant declined a time limit extension. Participants who were denied a time limit extension due to nonparticipation would likely be reassessed to determine activity assignments that best match the participant's needs and encourage increased participation, which may be similar to what was assigned while in the *W-2* employment position placement.

FEPs must meet with *CMD* participants weekly. Every 30 days, the FEP must review the *CMD* placement. The placement review must be held in a face-to-face meeting with the participant, either at the *W-2* agency or some other agreed upon location. At this meeting, the FEP must reassess the case. If the individual has consistently participated, the FEP must reassess whether barriers to employment exist. The FEP must also reconsider whether the individual is appropriate for a time limit extension.

The FEP must thoroughly document in PIN comments the details of the weekly meetings and the reassessment process as well as the reason(s) the participant is going to remain in the *CMD* placement, if that is the FEP's decision.

2.10.6.5.2 Case Management Practices and Time Limit Extension Approvals

When a participant is approved for a 24-month placement time limit or ~~60~~48-month state lifetime limit extension, the FEP must continue to review the participant's goals as part of ongoing case management and reinforce the necessity of meeting employment goals within the time limits of the *W-2* program. This includes:

- Reviewing the EP with the participant frequently to ensure activities are meaningful to the participant's goals and the participant is making progress in assigned activities;
- Reviewing relevant labor market data to confirm that employment goals are in line with the job opportunities available in the local labor market;
- Continuing to conduct informal assessment to determine whether potential barriers to employment exist and referring to formal assessment as appropriate (see 5.2.1);
- Reviewing whether the participant needs accommodations and has the tools and resources needed to complete activities (see 1.3.3); and
- Reviewing the Supportive Service Plan to ensure the participant has access to other benefits and services that will support them as they work towards their employment goals and also provide a plan for addressing needs following program exit (see 7.6.2).

2.10.7 Reapplying for W-2 Services after Reaching the Time Limit

The W-2 agency must process a W-2 application for anyone that requests W-2 services. This includes individuals who have previously reached their 24-month placement time limit or ~~60~~48-month state lifetime limit.

If the applicant meets W-2 financial and nonfinancial eligibility criteria and needs as determined by the informal assessment, but has reached the 24-month placement time limit or ~~60~~48-month state lifetime limit, the FEP must determine eligibility for a time limit extension based on the time limit extension criteria at reapplication. When applying the time limit extension criteria, the FEP must consider the applicant's prior W-2 participation and current circumstances. If the FEP determines that the applicant does not meet the time limit extension criteria and plans to deny a time limit extension, the FEP must ensure that during previous W-2 participation the individual was properly screened and assessed. Also, the FEP must make sure that accommodations and services necessary to address the participant's barriers were provided.

For applicants who have reached either a 24-month placement time limit or ~~48~~60-month state lifetime limit and no relevant formal assessment information is available, the FEP must determine the best placement type to assign and offer a time limit extension that allows for completion of any necessary formal assessments needed to support the time limit extension decision.

2.10.8 CMC Time Limits

2.10.8.1 CMC Participant Time Limit Extensions

The CMC placement is for eligible parents with newborns. (See 7.4.5) Whether an individual's time in a CMC placement counts against a 24-month placement time limit or the ~~60~~48-month state lifetime limit is determined by when the individual was first determined eligible for AFDC or a TEMP, CSJ, or W-2 T placement. The 60-month federal lifetime limit is determined by whether the payment received while in the CMC placement is considered ongoing cash assistance.

60-Month Federal Lifetime Limit

CMC placement months count toward the 60-month federal lifetime limit ONLY when the payment is considered ongoing cash assistance. The CMC payment is considered ongoing cash assistance when there is a W-2 T or CSJ placement immediately preceding the CMC placement.

CMC placement months do NOT count toward the federal lifetime limit when:

- There is a gap after any previous *W-2 Paid Employment Position* (CSJ or W-2 T) or there is no previous W-2 T or CSJ placement.
- The individual moves to the CMC placement directly from a W-2 case management, TEMP, or ARP placement.

EXAMPLE 1: Lanye was in a W-2 T placement for nine months and had a baby. She is moved directly into the CMC placement. Because she moved directly from a W-2 T placement to a CMC placement, the CMC months will count against the 60-month federal lifetime limit. Since Lanye had the baby less than 10 months after she was first determined eligible for the W-2 T placement, the CMC months will not count towards her ~~60~~48-month state lifetime limit.

EXAMPLE 2: Renee has never received W-2 or AFDC in the past. Renee applied for W-2 and was placed in an ARP placement. When Renee had her baby, she moved to a CMC placement. Because Renee has never been determined eligible for AFDC or a TEMP, CSJ, or W-2 T placement, the CMC months will not count toward the 60-month federal lifetime limit.

For more information on the 60- Month Federal Lifetime Limit see [2.10.9](#).

6048-Month State Lifetime Limit

CMC placement months count toward the ~~60~~48-month state lifetime limit ONLY if the child is born more than 10 months (304 days) after the date the individual is first determined eligible for AFDC or a TEMP, CSJ, or W-2 T placement. The 304 day period must be counted from the first *W-2 Employment Position* placement begin date.

CMC placement months do NOT count toward the ~~60~~48-month state lifetime limit when:

- The CMC participant's child is born less than 10 months from the date the individual was first determined eligible for AFDC or a TEMP, CSJ, or W-2 T placement;
- Eligibility was determined prior to October 1, 1996; or
- The birth was the result of sexual assault or incest and the incest or sexual assault has been reported to a physician and law enforcement authorities.

EXAMPLE 1: Rochelle has been in a W-2 T placement for the past 24 months and had a baby. She is moved directly into the CMC placement. Because it has been more than 10 months since she was first found eligible for the W-2 T placement, the CMC months will count against the ~~60~~48-month state lifetime limit.

EXAMPLE 2: Julie, a former W-2 participant, has a child, applies for W-2, and is found eligible for CMC. She was first determined eligible for a CSJ in March 2008. Therefore, the months in CMC will count against the ~~60~~48-month state lifetime limit because her baby was born more than 10 months after she was determined eligible for a CSJ.

24-Month Placement Time Limit

CMC placement months count toward a 24-month placement time limit ONLY if the child is born more than 10 months (304 days) after the date the individual is first determined eligible for AFDC or a TEMP, CSJ, or W-2 T placement AND the participant moved directly into a CMC from a TEMP, W-2 T, or CSJ placement. The 304 day period must be counted from the first employment position placement begin date.

Months will count against the 24-month placement time limit of the employment position placement from which he or she moved. The participant will be in a CMC placement, but the 24-month placement time limit months used will reflect their previous employment position.

EXAMPLE 1: Matilda has been in a CSJ placement for the past 24 months and had a baby. She is moved directly from the CSJ placement to the CMC placement. Because she moved directly from a paid employment position placement to a CMC placement, the CMC months will count toward the CSJ 24-month placement time limit.

EXAMPLE 2: Latashia was in a CSJ placement from April 2013 to December 2015, when she left the W-2 program. She applies for W-2 in March 2017 and is placed directly in a CMC placement. Because she did not move from a TEMP, W-2 T, or CSJ placement to the CMC placement, the CMC months will not count toward a 24-month placement time limit.

2.10.8.1 CMC Participant Time Limit Extensions

CMC participants are automatically eligible for 24-month placement time limit and ~~60~~48-month state lifetime limit extensions. The FEP must enter a time limit extension covering the time until the child turns 8 weeks of age. The FEP must then review the CMC case prior to the end of the 8 week CMC time period to determine if the CMC participant wants and is eligible for continued W-2 services. If the person wants cash assistance or other W-2 services beyond when the child turns 8 weeks of age, the FEP would have to follow normal eligibility determination policies, including time limit extension eligibility, if necessary.

2.10.9 Federal 60-Month Lifetime Limit

[2.10.9.1 Changing the Federal Indicator](#)

Per federal law, states cannot provide federal *TANF* cash assistance to most families for more than 60 months. Federal law does not require a state to provide assistance for any period of time, which gives states the flexibility to establish lifetime limits of less than 60 months. Wisconsin has established a ~~60~~48-month lifetime limit, ~~but~~ Each state has established a TANF lifetime limit. The lifetime limit varies, for example, in some states the limit is 24 months, in other states it is 60 months. Regardless of which state federal TANF assistance is received, it is counted as part of the 60-month federal lifetime limit and Wisconsin's 48-month lifetime limit.

In Wisconsin there are differences in how state lifetime limit months and federal months of assistance are counted. Months that count towards the ~~60~~48-month state lifetime limit do not always count toward the 60-month federal lifetime limit. It is also possible for a month to count toward the federal lifetime limit, but not the state lifetime limit because of the requirements for months in a *CMC* placement. (See 2.10.8)

Only months of assistance that are paid for with Federal TANF funds (in whole or in part) count toward the federal lifetime limit. (See 19.2.3) A month counts towards the 60-month federal lifetime limit if:

1. The individual receives an actual payment of \$1 or more through participation in a *CSJ* or *W-2 T* placement. (See 2.10.2.1)

- Months where the full payment was sanctioned to \$0 prior to W-2 pulldown do not count towards the ~~60-month~~ federal lifetime limit.

Note: If the placement on the last business day of the month is a *TEMP* placement (*TMP* or *TNP*), and there was a payment of \$1 or more for a CSJ or W-2 T placement in the same calendar month, the month will also count toward the individual's 60-month federal lifetime limit due to receipt of federally funded TANF cash assistance

- Months where a delayed payment is received count towards the month for which there was participation.
2. The individual receives a CMC payment and a W-2 T or CSJ placement immediately preceded the CMC placement. (See 2.10.8 for more information on time limits for CMC placements)
 - ~~Months do not count toward the 60-month federal lifetime limit if the individual has never before received AFDC or TANF or did not move directly from a W-2 Paid Employment Position (W-2 T or CSJ)..~~
 3. The individual receives transportation assistance while in an unpaid, case management only placement and certain conditions are met. (See 19.2.3)
 4. The individual received federally funded TANF cash assistance in any other state. (See 2.10.2.3.1)
 5. The individual is the other parent in the *W-2 Group* and is married to the placed parent who receives an actual CSJ or W-2 T payment of \$1 or more.
 - Months do not count toward the 60-month federal lifetime limit if the individual is a *Non-marital Co-parent* and is not the placed parent during a month.

The individual is exempt from having months count towards the federal lifetime limit if:

1. The individual is a qualified non-citizen or the placed parent in the W-2 Group is a qualified non-citizen. (See 2.4.2) W-2 payments made to qualified non-citizens are paid through state funds, not federal TANF funds, therefore those months do not count towards the federal lifetime limit.
2. The individual is living/lived on a federally recognized American Indian reservation, an Alaskan Native village, or an Indian country occupied by an Indian tribe during a month where at least 50% of the adults were not employed. (See 2.10.2.2)
3. The individual receives a \$50 supplemental payment through participation in a CMF+ placement. Supplemental payments made to CMF+ participants are paid through state funds, not federal TANF funds; therefore, those months do not count towards the federal lifetime limit.

EXAMPLE 1: Judy and Joan are married and have adopted a child, Beth. Judy is participating in a CSJ placement. For every month that Judy receives a payment for her CSJ participation, Joan uses an 'other parent' month that counts toward both the federal 60-month limit and the state 48 60-month lifetime limits.

EXAMPLE 2: Melissa and Keith are living together and have a child, Lenny. Melissa is in a W-2 T placement. For each month that Melissa receives a payment for her W-2 T participation, Keith will use an 'other parent' month that only counts toward the state 48 60-month lifetime limit. Because Keith is not married to Melissa, his 'other parent' months do not count towards his federal 60-month lifetime limit.

EXAMPLE 3: Ahmed and Julienne are married and have a child, Omar. Ahmed is a qualified non-citizen and is participating in a CSJ placement. Julienne is a U.S. citizen. For each month Ahmed participates in a CSJ placement, Julienne uses an 'other parent' month which only counts toward the state 48 60-month lifetime limit. Because Ahmed is a qualified non-citizen and his CSJ payment is paid through state funds and not TANF funds, these months do not count towards Ahmed or Julienne's federal time limits. If Julienne became the placed parent, those months would count towards her federal time limit, but they would not count towards Ahmed's time limit because he is a qualified non-citizen.

EXAMPLE 4: Hilda applies for W-2 on May 22. Her FEP places her in a W-2 T starting May 25. Hilda will receive a delayed payment in June for her May participation. In the Time Limit Tracking application module, Hilda will use a W-2 T month for May and the month used will count toward both the state 48-month lifetime limit and federal 60-month lifetime limits based on her participation from May 25 to May 31.

2.10.9.1 Changing the Federal Indicator

No Changes Needed