

BWF Operations Memo 21-22 Attachment 2

W-2 Manual Time Limits

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1.2.2 Resource Specialist

All [W-2](#) agencies must have a staff person who performs the role of a [RS](#). That staff person may perform other functions within the agency as well. The role of the RS is to understand the applicant's needs and assist applicants in determining which programs or services are likely to support their efforts to find and maintain employment.

In fulfilling this role, the RS will perform these primary functions:

1. Understand the applicant's situation and perform the initial review of need for employment-related services. The RS will:
 - a. Ask the applicant what brought them into the office today.
 - b. Ask the applicant what they need to find and/or keep a job.
 - c. Gather information through the [WWP](#) Informal Assessment Driver Flow about the applicant's recent job search efforts, employment skills, work history, education, and potential barriers to employment or participation in work activities.
 - d. Determine how the household composition and circumstances affect the applicant's ability to work or participate in work activities.
 - e. Identify whether the applicant is in a crisis situation (e.g., homeless, victim of domestic violence, no food in the house, etc.) and the potential need for an Emergency Payment. (See [19.1](#)) Give the applicant a copy of the [Domestic Violence Brochure \(2614-P\)](#). (See [1.4.6](#))
 - f. Identify the need for any necessary accommodations to help the applicant complete the application process.
 - g. Assess current child support case status and inform the applicant of the child support pass through policy for individuals in a [W-2 Paid Employment Position](#) placement. (See [15.1.1](#))
2. Inform each applicant about the services available and assist the applicant in determining what programs and services are likely to support the efforts at employment. The RS will:
 - a. Explain the services that are available through the W-2 program including [W-2 Employment Position](#) placements, individualized case management services, and supportive services. The RS must tell the applicant about the W-2 eligibility criteria and that eligible parents must be willing to participate in exchange for W-2 payments. The RS must also explain the W-2 24-month placement time limits and ~~48~~ 60-month state lifetime limit. (See [2.10](#))
 - b. Explain the Job Center Partner programs/other workforce development programs such as [DVR](#), [UI](#), [FSET](#), [WIOA](#), and other employment

programs and resources available through the Job Center of Wisconsin and within the community.

- c. Explain the supportive service programs such as [FS](#), Wisconsin Medicaid and BadgerCare Plus, Wisconsin Shares Child Care Subsidy Program, [EA](#), [WIC](#), [WHEAP](#), and local housing assistance programs.
- d. Explain the services available through the local [CAP](#) agency.

The RS must refer the applicant to any programs in which the applicant has indicated an interest.

3. The RS may initiate the [CWW](#) interactive interview to record non-financial and financial information such as income, assets and family composition.
4. As a condition of W-2 eligibility, the RS may:
 - a. Assign up-front job search activities to applicants. (See [2.9.2](#))
 - b. Require the applicant to apply for other appropriate public assistance programs or resources. (See [2.6.1](#))

No change to remainder of 1.2.2.

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, determining good cause, applying payment reductions, and recording participant progress in CARES.
11. Interpreting and explaining policies governing eligibility, including explaining the responsibilities and requirements outlined in the [PA](#) and securing the applicant's signature on the PA prior to beginning a [W-2 Employment Position](#). These policies include, but are not limited to: a) explaining that failure to cooperate during the application phase may result in ineligibility; b) providing information on the Fact Finding Process; c) emphasizing that W-2 is a time-limited program (see [2.10](#)); and d) explaining the W-2 agency's discrimination complaint process (see [1.4.6](#)).
12. Referring applicants who supply questionable information for front-end verification. (See [13.2.3](#))
13. Referring participants suspected of fraudulent activity for fraud investigation. (See [13.3.2](#))
14. When necessary, referring applicants and participants to other community services such as food pantries, domestic abuse services, homeless shelters, literacy councils, child welfare agencies, [DVR](#), and [AODA](#) / mental health services.
15. Assuring that final eligibility information for W-2 is transmitted to the child support agency, and assuring that participants cooperate with their child support agency. During eligibility reviews, the FEP must also review with the participant his or her child support assignment.
16. Explaining Learnfare, assessing Learnfare status for [Dependent Child](#) (ren) in a [W-2 Group](#), and providing or arranging for Learnfare case management. Ensuring enrollment and attendance for dependent child(ren) subject to Learnfare requirements. (See [Chapter 16](#))
17. Providing follow-up case management services for 12 months to participants who progress from a W-2 employment position to an unsubsidized position to encourage and support job retention and advancement. At local agency discretion, the participant may continue to receive the follow-up case management services of the FEP beyond the 12-month follow-up period. (See [7.2.3](#))
18. Maintaining an effective working relationship with the Job Center partners and other agencies that provide workforce development programs.
19. Explaining the W-2 lifetime limit and placement time limit policies. (See [2.10](#)) Positioning participants to achieve the best outcomes possible within the time limits of the program by providing early access to barrier remediation and employment supports. ~~Stressing time limits as a firm deadline and promoting rapid exit to employment.~~ Communicating the importance of full engagement in activities and careful transition planning to promote independence.

20. Ensuring participants with long-term barriers to work ~~that cannot be addressed within the lifetime limit~~ are referred to alternative programming for services that will meet their individual needs.

No change to remainder of 1.2.3.

2.2.1 List of Criteria

In order to be non-financially eligible for [W-2](#) services and [JALs](#) for any month, an applicant or participant must meet the following criteria. For eligibility information regarding minor parents, noncustodial parents, pregnant women, and pregnant women with at-risk pregnancies, see [7.5.2](#), [7.5.1](#), [7.5.3](#), and [7.4.6](#) respectively. For information on verifying the following criteria, see [Chapter 4](#).

1. Be a [Custodial Parent \(CP\)](#). (See [2.3.1](#))
2. Be 18 years of age or older.
3. Be a U.S. citizen or qualified non-citizen. (See [2.4.1](#))
4. Be a resident of Wisconsin and unless the applicant is a migrant worker, demonstrate an intent to continue living in the state.
5. Cooperate, unless good cause or other exceptions exist, with efforts to establish paternity of the [Dependent Child](#) or children and secure and enforce child support orders. This cooperation requirement extends to any [W-2 Group](#) member who is a custodial parent of a child whose paternity has not been established or who has a noncustodial parent. The requirements for custodial parents and noncustodial parents to cooperate with child support are outlined in [15.3.1](#).
6. Assign the rights to any support or maintenance (child or family support) to the state. (See [15.1.1](#))
7. Provide all requested documentation within seven working days after receiving the request for information from the W-2 agency. (See [4.1.3](#))
8. Have made a good faith effort, as determined by the W-2 agency on a case-by-case basis, to obtain employment and have not refused any bona fide offer of employment, including a job quit, within 180 calendar days immediately preceding application. This policy only applies to applicants and the W-2 agency has the discretion to define when a bona fide offer of employment has been made and what demonstrates a good faith effort. In addition, this applies specifically to individuals applying for one of the two [W-2 Paid Employment Position](#) s and does not apply to [ARP](#) and [CMC](#).
9. Have cooperated with the W-2 agency's assistance with finding employment if the current application is within 180 calendar days of a previous application

for W-2 services by the individual. This policy applies only to applicants and it only applies to noncooperation with the efforts of the W-2 agency to assist the individual in obtaining employment and does not pertain to every aspect of the application such as providing income verification. In addition, this applies specifically to individuals applying for one of the two W-2 Paid Employment Positions and does not apply to CMC and ARP.

10. Not receive SSI or state supplemental payments. If an individual has been determined eligible for SSI, he or she remains eligible for W-2 until he or she actually receives a SSI payment.
11. Not receive SSDI. If an individual has been determined eligible for SSDI, he or she remains eligible for W-2 until he or she actually receives a SSDI payment.

An adult disabled before age 22 may be eligible for child's disability benefits if a parent is deceased or starts receiving retirement or disability benefits. The adult disabled before age 22 receives the benefit based on a parent's Social Security earnings record. The adult must be unmarried, age 18 or older, and have a disability that started before age 22. FEPs must code this disability income as 'SSDC' in CARES Worker Web. For more information, see <https://www.ssa.gov/planners/disability/qualify.html#anchor8>

12. Not participate in a strike on the last day of the month. If eligibility is determined prior to the last day of the month and the applicant is on strike, they are ineligible. If a participant in a W-2 employment position goes on strike, that participant becomes ineligible for W-2.
13. Cooperate in applying for other public assistance programs or resources that the FEP believes may be available to the individual. (See [2.6.1](#))
14. Apply for or provide a SSN for all W-2 Group members, unless exempt. (See [2.7.1](#))
15. Report changes in circumstances that may affect eligibility within 10 calendar days after the change, except for temporary absence of a child which must be reported within five working days. (See [2.8.1](#))
16. Cooperate in providing information needed to verify school enrollment status or good cause for the Learnfare program for children age 6-17 in a W-2 Group whose parent is placed in a TMP, CSJ, or W-2 T placement. (See [Chapter 16](#)) Cooperate in providing school enrollment status and expected graduation date for a Dependent 18-year-old when the parent's W-2 eligibility is being determined based on that child as a Dependent 18-year-old.
17. Cooperate in the requirement to search for unsubsidized employment throughout his or her participation in a W-2 employment position. This requirement does not apply to CMCs, ARPs, or AmeriCorps VISTA Volunteers. (See [2.9.1](#))
18. Cooperate with providing eligibility information for other W-2 Group member(s).

19. Cooperate with providing information for quality assurance reviews.
20. Not be a fugitive felon. (See [42 U.S.C. 608\(a\)\(9\)\(A\)\(i\)](#))
21. Not be violating a condition of probation or parole imposed under federal or state law.
22. State in writing whether he or she has been convicted in any state or federal court of a felony that has an element of possession, use or distribution of a controlled substance. (See [11.7.1](#))
23. Have no other W-2 Group member participating in a W-2 employment position. This requirement does not apply to an individual applying for a [JAL](#) only.
24. Beginning on the date the individual has attained the age of 18, the total number of months in which the individual has actively participated does not exceed the ~~60~~[48](#)-month state lifetime limit. (See [2.10.1](#))
25. Verify pregnancy for pregnant women with no other dependent children. (See [7.5.3](#) and [7.4.6](#))

2.4.2 Qualified Non-Citizens

The following qualified non-citizens (formerly referred to as “Qualified Aliens”) may be eligible for [W-2](#):

1. An alien lawfully admitted to the United States for permanent residence under the [Immigration and Nationality Act \(INA\)](#);
2. An alien who is granted asylum under section 208 of the Immigration and Nationality Act;
3. A refugee who is admitted to the United States under section 207 of the Immigration and Nationality Act, including Special Visa Immigrants from Iraq and Afghanistan under section 1059 of H.R. 1815;
4. An alien who has been certified as a victim of trafficking;
5. An alien who is paroled into the United States under section 212(d)(5) of the Immigration and Nationality Act for a period of at least one year;
6. An alien whose deportation is being withheld under section 243(h) or 241(b)(3) of the Immigration and Nationality Act;
7. Cuban and Haitian aliens, as defined in section 501(e) of the Refugee Education Assistance Act of 1980;
8. An American Indian born in Canada who is at least 50% American Indian by blood, or an American Indian born outside of the United States who is a member of a federally recognized Indian tribe;

9. An alien who has been battered or whose child has been battered, who is no longer residing in the same household with the batterer, and who meets the requirements of 8 U.S.C. s. 1641(c);
10. An alien who is granted conditional entry pursuant to section 203(a)(7) of the Immigration and Nationality Act as in effect prior to April 1, 1980;
11. Amerasian Immigrants, as defined in section 584 of the Foreign Operations, Export Financing, and Related Programs Appropriations Act of 1988;
12. An alien who is lawfully residing and is one of the following:
 - a. An armed forces veteran who received an honorable discharge that was not on account of alienage and who completed either 24 months of continuous active duty or the full period for which the individual was called, unless the individual received a hardship discharge under 10 U.S.C. s. 1173, early discharge under 10 U.S.C. s. 1171, or a discharge due to a disability incurred or aggravated in the line of duty.
 - b. On active duty in the armed forces of the United States, other than active duty for training.
 - c. The spouse of an individual described in subdivision a. or b., or the unremarried surviving spouse of an individual described in subdivision a. or b. if the marriage was for one year or more or the individual had a child in common.
13. An alien who is lawfully residing in the United States and authorized to work by United States Citizenship and Immigration Services (USCIS).

W-2 for qualified non-citizens is not paid with federal funds, so they are exempt from the 60-month federal lifetime limit. Qualified non-citizens are subject to the ~~60~~48-month state lifetime limit and 24-month placement time limits. If an individual is in one of the qualified non-citizen groups listed above, and is coded as such on the **Immigrant/Refugee Information** page in CWW, CARES will automatically disregard federal months for qualified non-citizens. W-2 Agencies must not manually enter a federal month of TANF assistance for any month a qualified non-citizen participates in W-2. (See 2.10.9) In a two-parent case where one parent is a qualified non-citizen and the other is a U.S. citizen, the U.S. citizen will only use months of federal TANF assistance when the U.S. citizen is in a paid placement.

5.2.3.2 Required Timing for WWP Informal Assessment

The WWP Informal Assessment Driver Flow is required to be completed and submitted prior to initial W-2 placement and each placement change. The WWP Informal Assessment Driver Flow must always reflect the most recent and up-to-date information the W-2 worker has about the participant and his or her family. The FEP must revisit the

informal assessment inventory as needed and edit the appropriate WWP Informal Assessment pages to document any reported changes as part of the ongoing case management process.

The FEP must also complete and submit the WWP Informal Assessment to aid in identifying potential barriers to gaining or maintaining employment or additional service needs:

- When the individual requests to have the WWP Informal Assessment questions reviewed;
- When the FEP is considering denying an initial extension for a 24-month placement time limit or the ~~60~~48-month state lifetime limit and the WWP Informal Assessment has not been completed or updated within 12 calendar months prior to the participant's 24th or ~~60th~~ 48th month in an ongoing case. (See [2.10.6.5](#))

The FEP may also choose to complete the WWP Informal Assessment when there is reason to believe that reviewing the WWP Informal Assessment questions may help initiate conversation about a potential barrier that is affecting the participant's ability to work or participate in assigned activities.

7.2.3.5.5 State and Federal Lifetime Limits

Receipt of a supplemental payment will not count towards the state ~~60~~48-month lifetime limit (see [2.10.2](#)) or the federal 60-month lifetime limit (see [2.10.9](#)).

7.2.1 Unpaid Placements

Employment is the primary goal of the [W-2](#) program. Ideally, all W-2 participants end up in a placement related to unsubsidized employment.

The following three placements are related to unsubsidized employment:

- [CMU](#) is for employed applicants,
- [CMF](#) or [CMF+](#) is for participants who obtain unsubsidized employment while in W-2, and
- [CMJ](#) is for individuals who are unemployed but are ready for unsubsidized employment.

Participants placed in case management positions are not subject to the 60-month federal [TANF](#) lifetime limit or the ~~60~~48-month state W-2 lifetime limit.

Participants placed in case management positions are required to cooperate with Child Support. (See [15.3.1](#)) However, participants in case management positions do not have to assign a portion of the Child Support payments to the state. (See [15.1.1](#))

7.4.5.3 State ~~48~~ 60-Month Time Limit for CMC

Under specific circumstances, the CMC placement will count toward the ~~48~~ 60-month state lifetime limit. If the FEP determines that placement in CMC will count toward the individual's ~~48~~ 60-month state lifetime limit, the FEP must explain the impact this will have on the family's eligibility for future W-2 benefits. If CMC participants reach the ~~48~~ 60-month state lifetime limit while in the CMC placement they are automatically eligible for a time limit extension.

See [2.10.8](#) for more guidelines on CMC participants and the policies relating to W-2 time limit.

7.5.1.3.2 Stipend Payments

The W-2 agency may issue a stipend payment to an NCP at any point or frequency during the TSP placement based on the current needs of the individual while he or she is preparing for employment. Stipend payments must not be based on hours of participation in W-2 activities.

An NCP may receive stipend payments for a maximum of 16 weeks in a rolling twelve-month period. The W-2 agency may determine a stipend amount that is not to exceed \$200 per month, per NCP in the TSP placement. The amount of the stipend should help the NCP with meeting the costs associated with engaging in W-2 education and training activities.

Stipend payments should not be used in conjunction with other supports available to NCPs. W-2 agencies must offer NCPs assistance in developing a Supportive Service Plan (see [7.6.1](#)) and use this information to gauge the needs of the NCP while participating in W-2 activities.

NOTE: Stipend payments do not fall under the category of “cash assistance,” and NCPs receiving stipends are not subject to the state ~~60~~48-month lifetime limit. Stipends are a non-recurrent, short-term benefit authorized at 45 C.F.R. § 260.31(b)(1). The stipend is not intended to meet recurrent or ongoing needs of the NCP.

Placement in TSP on any day of the standard workweek, i.e., Sunday to Saturday, will count as one week. W-2 agencies should maximize NCP participation and move an NCP to the TSP placement on a Monday when possible.

W-2 agencies are required to move an NCP in the TSP placement to a TEMP job or unsubsidized job as quickly as possible. The stipend terminates when the NCP begins a TEMP job in the [TNP](#) placement (see [7.3.1](#)) or begins unsubsidized employment.

7.5.4 Case Management Denied (CMD)

The [CMD](#) placement is for individuals who have reached their time limit and are no longer eligible for a paid placement. When a participant is denied or declines an extension, the [FEP](#) must offer the CMD placement.

The goals of the CMD placement are to:

- Help match the individual to employment;
- Connect the individual and family to services in the community; and
- Reassess on a monthly basis whether the individual is eligible for an 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.

EXAMPLE: Karl has been a [CSJ](#) participant for 18 months. The activities he was assigned to were Life Skills, Job Readiness/Motivation, Mental Health Counseling for his daughter Kassandra, Work Experience, and Employment Search. He started missing activities and after talking with his FEP, he was referred for a formal assessment with a mental health provider. Karl never followed through with that referral. With Karl's 24th month approaching, the FEP wanted to discuss with him his eligibility for an extension. His FEP attempted to reach him by phone and mail a number of times to discuss an extension, but Karl never responded. In Karl's 22nd month, he contacted his worker and told her that he was feeling depressed again. The FEP discussed with Karl the fact that he was going to reach his 24-month time limit and that he had not been participating. However, due to the potential depression, the FEP gave Karl a three month extension and scheduled another referral to a mental health provider in addition to work experience and employment search. Karl never followed through on the second referral and only participated sporadically in the assigned activities. The FEP denied eligibility for a subsequent time limit extension due to Karl's nonparticipation and placed Karl in a CMD to try and assist Karl in finding employment.

Services provided to a CMD participant will depend largely on the reason for the extension denial or the reason the participant declined an extension and the placement the individual was in at the time of the denial or the time the participant declined an extension. Participants who were denied an extension due to nonparticipation would likely be assigned to activities similar to what was assigned while in the subsidized employment position.

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 an extension.

12.2.1 Request For Fact Finding Review

All [JAL](#) applicants and [W-2](#) applicants and participants have the right to request a Fact Finding Review. The Fact Finding Review is completed by the W-2 agency's Fact Finder. It is the first level of the dispute resolution if an applicant or participant believes:

1. The denial of an application for JAL or W-2 services was incorrect;
2. The application was not acted upon with reasonable promptness;
3. The W-2 placement was inappropriate;
4. The W-2 placement begin date was wrong;
5. The W-2 payment was incorrectly ended, reduced, or subject to an overpayment;
6. The extension to a W-2 24-month placement time limit or ~~60~~[48](#)-month state lifetime limit was incorrectly denied; and/or
7. The denial of a good cause request for noncooperation with child support was incorrect.

If an applicant or participant requests a Fact Finding Review for a complaint not related to any of the above reasons, the W-2 agency must provide the [Petitioner](#) with a completed [Fact Finding Review Denial Notice \(2686\)](#) form.

An applicant or participant who requests a Fact Finding Review should be encouraged to use the form [Request for Wisconsin Works \(W-2\) Fact Finding Review \(10783\)](#). However, the petitioner may use other documentation containing the same information found in the form. A W-2 agency must also accept phone requests for Fact Finding Reviews and must document the phone request using the form [Request for Wisconsin Works \(W-2\) Fact Finding Review \(10783\)](#).

With the exception of a Learnfare Fact Finding Review request made within 10 calendar days after the date of the Learnfare Penalty Notification, the agency decision stands until it is overturned by a Fact Finding Review or a Departmental Review.

12.2.3 Fact Finding Reasons

A JAL applicant may request a Fact Finding Review if he or she believes:

1. The denial of an application for a JAL was incorrect;
2. A JAL application was not acted upon within 12 working days; or
3. The agency's determination of a JAL IPV was incorrect.

A W-2 applicant or participant may request a Fact Finding Review if he or she believes:

1. The denial of an application for W-2 was incorrect;
2. The application was not acted upon within 12 working days;
3. The W-2 placement was inappropriate;
4. The placement begin date was wrong;
5. The W-2 payment was incorrectly ended, reduced, or subject to an overpayment;
6. The extension to a W-2 24-month placement time limit or ~~60~~48-month state lifetime limit was incorrectly denied;
7. The denial of a good cause request for noncooperation with child support was incorrect; or
8. The agency's determination of an IPV was incorrect.

19.2.3 Transportation Assistance and Time Limits

A W-2 participant who receives transportation assistance is subject to all TANF requirements pertaining to the 60-month federal lifetime limit and other nonfinancial requirements. (See 2.2.1)

TANF assistance includes payments, vouchers, and other forms of benefits designed to meet a family's ongoing needs (food, clothing, shelter, utilities, household goods, personal care items, and general incidental expenses).

W-2 participants in an unpaid, case management only, placement will not use a month toward the ~~60~~48-month state lifetime limit and 60-month federal lifetime limit for receipt of transportation assistance if any of the following apply:

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- They are employed for at least one hour per month;
- They are engaged in job search/readiness activities requiring child care;
- The transportation is not provided for longer than four months; or,
- The transportation services are provided via a group transportation or transportation capacity building project (e.g. someone who rides a TANF funded expanded bus route is not receiving assistance because the service does not have a direct monetary value to the individual family).

Therefore, several factors determine whether issuing transportation assistance to a participant in a case management only placement will use a month toward the ~~60~~48-month state lifetime limit and 60-month federal lifetime limit. When transportation assistance will use a federal and state month of assistance, the FEP must advise the participant of the potential impact and weigh the cost of using months of lifetime eligibility against the benefit of the service before assistance is given.

W-2 participants in CSJ, pro-rated CSJ, W-2 T, and some CMC placements (see 2.10.8) will not use a month toward the 60-month federal lifetime limit and ~~60~~48-month state lifetime limit for transportation assistance because the participant will use a federal month due to the receipt of TANF cash assistance.