



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

FROM: Patara Horn, Director
Bureau of Working Families
Division of Family and Economic Security
Department of Children and Families

BWF OPERATIONS MEMO					
No:	25-02				
DATE:	02/03/2025				
W-2	<input checked="" type="checkbox"/>	EA	<input type="checkbox"/>	CF	<input type="checkbox"/>
JAL	<input checked="" type="checkbox"/>				
RAP	<input type="checkbox"/>	TMJ	<input type="checkbox"/>	TJ	<input type="checkbox"/>
Other EP	<input type="checkbox"/>				

SUBJECT: *Updates to W-2 Program Integrity Policy*

CROSS REFERENCE: [W-2 Manual Section 4.1.5](#)
[W-2 Manual Chapter 10](#)
[W-2 Manual Section 12.4](#)
[W-2 Manual Chapter 13](#)

EFFECTIVE DATE: Immediately

PURPOSE

The purpose of this Operations Memo is to describe updates to Wisconsin Works (W-2) and Job Access Loan (JAL) policy pertaining to program integrity.

BACKGROUND

Since June 2023, the Bureau of Working Families (BWF) has been reviewing all policy affecting W-2 and JAL program integrity. As a result, BWF has updated and reorganized multiple sections of fraud, overpayment, and other related policy into a new chapter called Program Integrity. The goals of this policy update are to:

- Modernize fraud prevention and investigation policy to align with Division values;
- Ensure W-2 agencies have accurate and clear guidance on overpayment processing;
- Make terminology consistent throughout the W-2 Manual; and
- Add examples and additional guidance to aid understanding.

POLICY

POLICY REORGANIZATION

Existing policy relating to fraud, overpayments, and other related topics throughout the manual has been reorganized into a single new chapter called Program Integrity.

This chapter is arranged into six separate sections: Introduction, Prevention, Detection, Investigation, Sanctions, and Collections.

Introduction: This new section outlines the responsibilities of W-2 agencies to have a program integrity plan and fraud standard operating procedures.

Prevention: This section includes information on Front-End Verification, Error-Prone Profiles, and other fraud and error prevention processes.

Detection: This section includes information on data exchanges and other sources for identifying potential fraud and error.

Investigation: This section outlines the investigation process to determine if fraud or error occurred.

Sanctions: This section outlines potential penalties for fraud, including Intentional Program Violations (IPVs).

Collections: This section includes information on overpayments, including recoupment, repayment, and centralized collection for delinquent payments.

This new chapter will be placed in Chapter 13 and includes information pulled from Chapters 4, 10, 12, and 13.

NEW AND UPDATED POLICY

Policy was updated and added throughout to:

1. Ensure alignment with Division values and goals;
2. Remove information that is not authorized by Wisconsin state statute and administrative rule; and
3. Provide additional context, clarification, consistency, and examples.

The new Program Integrity Chapter 13 is attached to this memo and will be incorporated into the W-2 Manual on February 24, 2025. Policy that was removed is highlighted light grey, and policy that was added is highlighted in yellow.

Note: Many sections have been moved and reorganized. This is indicated in the policy attachment with grey or yellow highlights for the section name.

TRAINING

The Partner Training Team is developing a new Troubleshooting W-2 Overpayment Webinar which will focus on overpayments with multiple date ranges, child support retained, nonparticipation, adverse action, and what to look for when the overpayment doesn't seem correct. This webinar will be available in Spring 2025.

AGENCY ACTION

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

ATTACHMENTS

[Chapter 13 Policy Attachment](#)

CONTACTS

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

For W-2, CARES and WWP Functionality Questions: BWF Work Programs Help Desk
BWFworkprogramsHD@wisconsin.gov

DCF/DFES/BWF/MO