



Wisconsin Department of
Children and Families

Wisconsin's Combined State Plan under the Workforce Innovation and Opportunity Act (WIOA)

Section VII: Program-specific requirements for Wisconsin's Temporary Assistance for Needy Families (TANF)

Program Year 2024

Prepared by
Bureau of Working Families
Division of Family and Economic Security

TANF General Provisions

References to the State Statutes: Sections of this Plan include references to the Wisconsin Statutes. The statutes are available online at:

<https://docs.legis.wisconsin.gov/statutes/prefaces/toc>

References to the Wisconsin Works (W-2) Manual: Sections of this Plan include references to the W-2 Manual. The W-2 Manual is published on the Wisconsin Department of Children and Families (DCF) website at:

<https://dcf.wisconsin.gov/manuals/w-2-manual/Production/default.htm>

References to the Emergency Assistance (EA) Manual: Sections of this Plan include references to the EA Manual. The EA Manual is published on the Wisconsin DCF website at:

https://dcf.wisconsin.gov/manuals/ea-manual/Production/EA_Manual.htm

References to the State Administrative Rules: This Plan includes references to the State Administrative Rules. The Administrative Rules are published online at:

https://docs.legis.wisconsin.gov/code/admin_code

Wisconsin provides several types of Temporary Assistance to Needy Families (TANF) programs, including the Wisconsin Works (W-2) program. The Department of Children and Families (DCF) administers Wisconsin's core TANF programs (W-2, other work programs, Kinship Care, and the Wisconsin Shares child care subsidy program) and is responsible for the TANF section of the WIOA Combined Plan. DCF works closely with the other state departments that also administer TANF programs and services, including the Wisconsin Department of Administration (DOA), Wisconsin Department of Health Services (DHS), Wisconsin Department of Public Instruction (DPI), Wisconsin Department of Revenue (DOR), and Wisconsin Department of Workforce Development (DWD).

States that include TANF in the Combined State Plan must outline how the State will meet the requirements of section 402 of the Social Security Act including how it will:

(a) Conduct a program, designed to serve all political subdivisions in the State (not necessarily in a uniform manner), that provides assistance to needy families with (or expecting) children, and provides parents with job preparation, work, and support services to enable them to leave the program specifically cash assistance, and become self-sufficient (section 402(a)(1)(A)(i) of the Social Security Act).

Since 1997 Wisconsin has administered W-2, a welfare-to-work program, for low-income families. W-2 is based on work participation and personal responsibility. The program provides employment preparation services, case management, supportive services, and cash assistance to eligible families.

W-2 Contracts for Calendar Years 2013 through 2024

Key changes implemented in W-2 Contracts beginning with 2013 include:

- Payments are structured to incentivize W-2 Contractors to prepare and place participants in sustainable jobs.
- Contractors are paid for specific outcomes, as well as for allowable costs.
- Longer contracts between DCF and W-2 Contractors create sustainable and stable long-term program outcomes and strengthen contract relationships.
- Management and oversight of participant cash payments are administered directly by DCF so W-2 Contractors can focus on job activities without the fear of liability for cash payments.
- DCF divided the state into ten geographical areas: four geographical areas in Milwaukee County, and six geographical areas in the Balance of State (BOS). These larger service areas for W-2 Contractors have been established to achieve economies of scale in operations and more cost-effective and efficient program administration.

In 2018, DCF identified funding for BOS W-2 Contractors to fund a 1.0 full time equivalent for a W-2 Child Support Liaison position, responsible for creating direct communication, coordination, and cooperation between the W-2 agencies and the local Child Support agencies with the goal of ensuring that low-income noncustodial parents receive the services they need to find work and support their children. A W-2 Child Support Liaison position was added for the four W-2 Contractors in Milwaukee in 2019.

The 2013-2024 W-2 Contractors for each geographical area are:

- Ross Innovative Employment Solutions in Milwaukee Northern area;
- UMOS, Inc. in Milwaukee Southern area;
- America Works of Wisconsin, Inc. in Milwaukee East Central area;
- MAXIMUS Human Services, Inc. in Milwaukee West Central area;
- Equus Workforce Solutions in BOS Southeast area;
- Forward Service Corporation in BOS Southwest area;
- Forward Service Corporation in BOS Northeast area;
- Forward Service Corporation in BOS North Central area;
- Workforce Resource, Inc. in BOS Northwest area; and
- Workforce Connections, Inc. in BOS Western area.

W-2 Program Goals and Assumptions

The primary goals of the W-2 program are to: help eligible parents prepare for, obtain, and keep unsubsidized employment; help parents provide for their families; and become self-sufficient members of the community in which they live. For eligible parents who cannot work for a long period of time due to significant disability, the W-2 program helps the parents apply for and receive Supplemental Security Income (SSI) /Social Security Disability Insurance (SSDI).

W-2 policies are guided by the following basic assumptions:

- Work is the best way for parents to support their families.
- Family income should improve when parents work.
- Consistent work is essential for parents to achieve economic stability.
- W-2-eligible participants are parents as well as job seekers.
- Eligible parents must be willing to participate in work or work-like activities in exchange for W-2 payments.

- Families benefit from participating in W-2.
- W-2 matches the employment needs of parents with the needs of local employers.

(See W-2 Manual Chapter 1.)

Community Steering Committees

To strengthen the connection between the employment focus of W-2 and real employment opportunities in local areas, Wisconsin requires its contracted W-2 agencies to establish Community Steering Committees to identify and encourage employers to create work-experience opportunities, subsidized employment opportunities, and permanent unsubsidized jobs for W-2 participants. W-2 agencies are required to appoint to the committees at least one representative of business interests, and each county served by the W-2 agency must be represented on a steering committee by a member of the business community in that county or by a person from a city or county economic development department in that county. These committees are required to coordinate with local workforce investment boards and must appoint a chairperson that represents business interests. Wis. Stat. § 49.143(2)(a).

W-2 Program Eligibility

There are five categories of individuals who may be eligible for W-2 services:

1. Individuals age 18 or older who are custodial parents of minor children;
2. Individuals age 18 or older who are Non-Custodial Parents (NCPs) of minor children and the subject of a child support order, if the custodial parent of the minor children is participating in W-2 or the Wisconsin Shares child care subsidy;
3. Individuals under age 18 who are custodial parents of minor children;
4. Pregnant women age 18 or older who are not custodial parents; and
5. Unmarried pregnant women age 18 or older who are in their third trimester of an at-risk pregnancy that results in their inability to work.

Custodial parents may be eligible for all W-2 services. Minor parents and NCPs may be eligible for W-2 case management services and Job Access Loans (JAL). An NCP may also be eligible for a monetary stipend for up to four months or a Trial Employment Match Program (TEMP) job. Pregnant women who are not custodial parents are eligible for case-management services. Those in their third trimester of an at-risk pregnancy that renders them unable to work may be eligible for cash assistance.

W-2 Program Financial and Non-financial Eligibility Requirements

Financial Eligibility Requirements

The W-2 group's income must be at or below 115 percent of the federal poverty level (FPL). All earned and unearned income of all the W-2 group members is counted in determining the 115 percent gross income test, with the exception of the following:

- Tax Refunds;
- Educational aid;
- Federally funded benefits; and
- Earned income of a dependent child.

(Wis. Stat. § 49.145(3)(b))

At application, the W-2 group's assets cannot exceed \$2,500 in combined equity value, excluding the combined equity value of vehicles up to ten thousand dollars (\$10,000) and one home that serves as the homestead (Wis. Stat. § 49.145(3)(a)).

Once eligible for W-2, if the W-2 group's assets exceed \$2,500 for two consecutive months, the group becomes ineligible for W-2 (Wis. Stat. § 49.145(4)).

2017 Wisconsin Act 269 provides that the value of a home serving as the W-2 group's homestead may only be excluded if the home is valued at no more than 200 percent of the statewide median value for homes, excluding the value of agricultural land owned by the W-2 group. DCF has established a hardship exemption to these asset restrictions by administrative rule in Wis. Admin. Code DCF 101.09(3m)(c). The hardship exemption allows agency workers to disregard any home valued at more than 200 percent of the statewide median home value if any of the following criteria are met:

- No member of the W-2 group has the legal right to sell the home, including for reasons such as the home is subject to pending litigation and the home is jointly owned with a person who is not in the Wisconsin Works group and who refuses to consent to the individual in the Wisconsin Works group selling his or her share;
- The individual had a recent sudden loss of income due to death, divorce, separation, or non-payment of support;
- The Wisconsin Works group includes an incapacitated group member; or
- The individual is or has been a victim of domestic abuse or is at risk of further domestic abuse, or the home is jointly owned with the abuser, and the abuser is not a member of the Wisconsin Works group.

Non-financial Eligibility Requirements

1. Custodial parent [Except NCPs are eligible for JALs, limited stipends, and TEMP placements]. Wis. Stat. § 49.145(2)(a).
2. Age 18 or above. Wis. Stat. § 49.145(2)(b).
3. U.S. Citizen or qualifying alien. Wis. Stat. § 49.145(2)(c) and § 49.84(5).
4. Residence in Wisconsin. Wis. Stat. § 49.145(2)(d).
5. Cooperation in establishing paternity. Wis. Stat. § 49.145(2)(f)1.a.
6. Cooperation in obtaining support payments. Wis. Stat. § 49.145(2)(f)1.b.
7. Furnishes agency with relevant information. Wis. Stat. § 49.145(2)(g).
8. Made good-faith effort to obtain employment, has not refused any bona fide offer of employment within the 180 days prior to application, and searches for unsubsidized employment while the application is processed, if required by the W-2 agency. Wis. Stat. § 49.145(2)(h)-(hm), and Wis. Stat. § 49.147(2)(a).
9. Not receiving Supplemental Security Income (SSI), Social Security Disability Insurance (SSDI), Social Security Child's Disability (SSDC), or state supplemental payments. Wis. Stat. § 49.145(2)(i).
10. Not participating in a strike. Wis. Stat. § 49.145(2)(j).
11. Applies for or has a Social Security Number. Wis. Stat. § 49.145(2)(k) and § 49.82(2); Wis. Admin. Code DCF 101.09 (2).

12. Reports changes in circumstances within 10 days. Wis. Stat. §49.145(2)(m).
13. Participation in W-2 does not exceed 48 months except when the agency determines that the individual is experiencing hardship or that the individual's family includes an individual who has been battered or subjected to extreme cruelty. Wis. Stat. §49.145(2)(n). The 48 month lifetime eligibility limit went into effect with the passage of administrative rule Wis. Admin. Code DCF 101.09(2)(n), which was implemented November 1, 2021.
14. No other member of the W-2 group is participating in W-2. Wis. Stat. § 49.145(2)(q).
15. Not a fugitive felon. Wis. Stat. § 49.145(2)(r).
16. Not violating a condition of probation, extended supervision, or parole. Wis. Stat. § 49.145(2)(rm).
17. Assigns to the state any support or maintenance from any other person. Wis. Stat. § 49.145(2)(s).
18. Identifies in writing whether s/he has been convicted of a drug felony. Wis. Stat. § 49.145(2)(v).
19. Complies with other eligibility criteria established by the Department through administrative rule. Wis. Stat. § 49.145(2)(L).
20. Not ineligible due to receipt of child care assistance while residing with the child's other parent and that parent refuses to participate in prescribed work, training, or community-service activities. Wis. Stat. § 49.15 and Wis. Stat. § 49.151(1m).

(See W-2 Manual Chapter 2.)

W-2 Program Services and Placements

The primary components of W-2 case management include screening and assessment, development of employment goals and an Employability Plan (EP), and participation in activities associated with the individual's assigned paid or unpaid placement. Case management is a dynamic process, and plans and activities are subject to changes which reflect additional information obtained during ongoing case management.

Screening and Assessment

Screening and assessment include informal assessment, educational needs assessment, career assessment, and formal assessment. The purpose of the informal assessment is to gather information about an individual and his or her family to determine the individual's ability to become employed and remain employed; services and activities necessary for the individual to become employed and remain employed; appropriate placement of a participant; need for further career assessment and planning; need for vocational evaluation; existence of potential disabilities or other specific limitations through screening with a validated screening tool; and need for a formal assessment of any disabilities or other employment barriers by a qualified assessing agency or individual. Informal assessment is an ongoing case management practice which starts during the W-2 application period and continues until the individual no longer receives W-2 services. (See W-2 Manual Chapter 5.)

Employability Plan

Every W-2 participant works with a Financial and Employability Planner (FEP) to develop an initial EP. 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/her

employment goal (or goal to obtain SSI/SSDI) and what the W-2 program will do to assist in that effort. The EP also may include goals to help the participant meet basic and immediate family needs such as food, clothing, shelter, and health care. Meeting these needs helps the family to achieve and/or maintain economic stability. The EP is reviewed and updated at least once every six months, and may be updated more frequently if individual circumstances change. (See W-2 Manual Chapter 6.)

W-2 Program Paid and Unpaid Placements

The W-2 program has paid placements in which the participant receives a monthly payment, a subsidized employment placement in which the participant receives a subsidized wage, and unpaid placements in which the participant receives case management services only. Every applicant and participant is assigned to a placement to meet his or her individual needs. The W-2 program has multiple placements to meet the needs of eligible parents with varying skills and circumstances.

W-2 Paid Placements

The W-2 program's paid placements are: Community Service Job (CSJ); W-2 Transition (W-2 T); Custodial Parent of an Infant (CMC); and At-Risk Pregnancy (ARP).

1. CSJ placements are for individuals who need to develop basic skills and work habits in a work training environment. Two-third, one-half, and one-third time CSJ placements may be used for individuals already working part-time who need to develop additional skills for full-time employment. CSJ participants are expected to complete 40 hours of activities per week but can be assigned fewer hours depending on the participant's circumstances. Of these 40 hours, up to 10 hours per week can be in education and training activities. CSJ work training hours countable toward the maximum 40 hours of activity as approved by the FEP may include:
 - Work experience;
 - Training activities conducted at the CSJ work training site;
 - Other assigned work training activities, such as:
 - Job search activities;
 - Vocational rehabilitation; and
 - Meetings with child support agency staff, social workers, health care professionals or other meetings approved by the FEP and necessary to prepare a participant for employment.
2. W-2 T placements are for individuals who are unable to perform independent, self-sustaining work because of domestic abuse, functional limitations, disability, or family barriers. Based on the results of a formal 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. Examples of W-2 T work-training activities approved by the FEP may include:
 - 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 vary depending on the focus of the program, but may include:

- Disability and Learning Assessment;
 - Career Planning & Counseling;
 - Employment Search;
 - Mentoring/Coaching;
 - Job Readiness/Motivation;
 - Occupational Testing;
 - On-The-Job Training;
 - Paid Work Experience in the public sector, not funded by TANF;
 - Work Experience;
 - Activities similar to a CSJ, but with more supervision; or
 - Volunteer activities.
3. CMC placements are for individuals who are the custodial parent of an infant who is eight weeks old or younger. Participants in this placement are not assigned to activities; however, they are encouraged to volunteer for activities that help them prepare for work and the demands of being a parent.
4. ARP placements are for unmarried women who are in the third trimester of an at-risk pregnancy that results in their being unable to work, and who meet all W-2 eligibility criteria except that they are not a custodial parent of a dependent child. Participants in this placement are not assigned to activities; however, they may volunteer, with medical approval, for activities that help them prepare for work and the demands of being a parent.

W-2 Subsidized Employment Placement

The W-2 program's subsidized employment placement is the Trial Employment Match Program (TEMP) job placement. TEMP job placements are for individuals who have some basic employment skills but still need some assistance and work experience to succeed in unsubsidized employment. An individual working in a TEMP job earns at least minimum wage, and the W-2 agency subsidizes all or a portion of the hourly wages paid to the individual by the employer. There are two TEMP placements: TEMP for custodial parents (CPs) and TEMP for non-custodial parents (NCPs). TEMP placements are available to CPs and NCPs statewide as of January 1, 2019. NCP TEMP is an exception to the general requirement that W-2 participants be CPs. An NCP that is cooperating with child support and shares a child in common with a CP who is in W-2 or receiving a Wisconsin Shares child care subsidy (due to participation in other qualifying activities, typically unsubsidized employment), is eligible for a TEMP job and enhanced case management, including a monetary stipend for up to four (4) months.

W-2 Unpaid Placements

The W-2 program's unpaid placements are: Case Management Job Ready (CMJ); Case Management Follow-Up (CMF); Case Management for Underemployed (CMU); Case Management for Non-Custodial Parents (CMN); Case Management for Minor Parents (CMM); Case Management for Pregnant Women (CMP); and Case Management Denied (CMD).

1. CMJ placements are for unemployed individuals who are able to find and keep employment. The goal of the CMJ placement is to rapidly connect individuals who are job ready to employment. CMJ participants are generally assigned to employment search, career planning, and job readiness/motivation activities.
2. CMF placements support job retention for twelve (12) months for on-going W-2 participants who progress from a paid placement to unsubsidized employment. CMF activities encourage participants to stay employed and advance in their careers. Qualifying CMF placed participants may be eligible for a worker supplement, known as CMF+.
3. CMU placements are for employed applicants who do not have any barriers to full-time employment and meet the W-2 nonfinancial and financial eligibility requirements. The goal of CMU is to give participants the assistance they need to stay employed and advance in their careers. CMU placements are also for participants that participated in the CMF placement for twelve months and wish to receive additional case management services.
4. CMN placements are for NCPs of children whose CP is either participating in W-2 or receiving subsidized child care assistance. CMN activities may include employment search, job retention services, career advancement services, and education and training. A stipend may be paid to NCPs who are unemployed, participating in education and training in certain counties, and are not ready for a TEMP job.
5. CMM placements are for custodial minor parents. Case management services include providing individuals with information on family planning services, available child care services to enable the individual to complete school, employment and training services, and eligibility for other programs, including medical assistance and nutrition programs.
6. CMP placements are for pregnant women who do not have custody of any children. Activities include job search, child care related activities, and activities designed to reduce barriers to employment. Once the child is born, the participant may be eligible for the paid CMC placement, discussed above. CMPs typically transition to the CMC placement after the birth of the child.
7. CMD placements are for individuals who have reached their W-2 time limit and are no longer eligible for a W-2 paid placement. Activities include help to match the individual to employment, to connect the individual and family to services in the community, and to reassess on a monthly basis whether the individual is eligible for an extension.

(See W-2 Manual Chapter 7.)

Time Limits

The maximum period of participation in a TEMP, CSJ, or W-2 T placement is limited to 24 months for each placement. Extensions of the 24month limit may be available on a limited basis when barriers exist that prevent employment. (See W-2 Manual, Chapter 2.) Under provisions of 2015 Wisconsin Act 55, Wisconsin changed its maximum lifetime limit from 60 months for W-2 participation to 48 months, as well as the criteria for approving extensions. Under the amended statute, W-2 agencies may grant extensions of the 48-month lifetime limit if they determine, in accordance with rules promulgated by DCF, that an individual is experiencing hardship or that the individual's family includes a member who has been battered or subjected to extreme cruelty. Act 55 also contained non-statutory language that gives DCF discretion to allow individuals participating in W-2 on the effective date of the 48-month lifetime limit to remain in W-2 for an appropriate time beyond 48

months in order to allow for transition out of W-2. DCF promulgated rules to define “hardship” and the criteria for the transition period, which was implemented November 1, 2021(See W-2 Manual Chapter 2.)

Drug Felons

If a participant in a CSJ or W-2 T placement was convicted in any state or federal court of a drug-related felony within five years of applying for a W-2 paid placement, the individual must submit to a test for use of a controlled substance as a condition of continued eligibility.

If the test results are positive, the W-2 agency must decrease the pre-sanction benefit amount for that participant by up to (15) percent for no fewer than (12) months, or for the remainder of the participant's period of participation in the employment position, if less than 12 months. The W-2 agency may also require an individual who tests positive for use of a controlled substance to participate in a drug abuse evaluation, assessment, and treatment program as part of the work or education and training requirements for that employment position. The participant will be required to take another drug test at the end of the sanction period to determine whether he or she is eligible for a full W-2 payment. (See W-2 Manual Chapter 11.)

Controlled Substance Abuse Screening, Testing, and Treatment

2017 Wisconsin Act 59 expanded current controlled substance abuse screening, testing, and treatment requirements as a condition of eligibility for certain DCF work experience programs to the following W-2 paid placements: TEMP, CSJ, and W-2 T. Individuals applying for a W-2 paid placement as well as all adult members of the applicant's W-2 group whose income or assets are included in determining the individual's eligibility for W-2 will be subject to the requirements. The screening and testing requirements do not apply to custodial parents of a child who is eight weeks old or less, women in a medically verified at-risk pregnancy, or group members exempted by DCF administrative rule. DCF is required to promulgate rule to implement the controlled substance abuse screening, testing, and treatment requirements for W-2.

Individuals applying for a W-2 paid placement as well as all adult group members of their W-2 group will be required to complete a controlled-substance abuse screening. If, on the basis of the screening results, the administering agency determines there is a reasonable suspicion that the individual or group member is abusing a controlled substance, the individual or group member must undergo a drug test. Individuals or group members who test positive for a controlled substance without evidence of a valid prescription will be required to participate in a treatment program in order to remain eligible to participate. During the time that an individual or group member is receiving substance abuse treatment, the individual or group member is required to undergo random testing for the use of a controlled substance. In addition, a test for the use of a controlled substance is required at the completion of substance abuse treatment.

If an individual or any of the individual's W-2 group members fails to satisfy the screening, testing, or treatment requirements, then the individual will remain partially eligible for reduced monthly payments under a CSJ or W-2 T placement. A protective payee will receive the payment and use it exclusively for the benefit of the dependent children. The individual

will remain partially eligible for 12 months. DCF may promulgate rules providing criteria for the individual to regain eligibility for full participation earlier than the end of the 12-month period.

W-2 Related Programs

In addition to the W-2 program, W-2 agencies administer the “related programs” of Contracted Child Care, Emergency Assistance (EA), Job Access Loans (JAL), and Refugee Cash Assistance (RCA) to help eligible individuals and their families.

1. Contracted Child Care provides short-term child care at the W-2 agency locations or through contracted slots at a regulated child care provider to ensure children are in a quality child care setting while their parents are accessing services at the W-2 agency.
2. EA provides funding to families that meet all EA eligibility requirements including experiencing a current emergency due to homelessness, impending homelessness, energy crisis, fire, flood, or natural disaster. (See EA Manual.)
3. JALs are short-term, interest-free loans to meet immediate and discrete expenses related to obtaining or maintaining employment. (See W-2 Manual Chapter 17.)
4. RCA is a time-limited program for low income refugees who meet the financial eligibility standards of W-2 and meet the RCA program’s criteria for refugee status. A parallel assistance program is the Refugee Medical Assistance (RMA) program for those who do not meet Medicaid eligibility criteria. (See W-2 Manual Chapter 18.) Note: Wisconsin funds RCA with funding other than TANF or TANF Maintenance of Effort (MOE).

Many of Wisconsin’s TANF programs use a percentage of the FPL to define eligible needy families. While each program has its own standards, none exceed 300 percent of the FPL. The applicable program description indicates when an alternate measure of neediness is used.

Wisconsin’s Other TANF Programs and Services

In addition to W-2 and the W-2 Related Programs described in this section, Wisconsin supports other TANF programs and services described below.

Note: In addition to the W-2 and the Related Programs described in this Plan, the below programs are anticipated to be funded with TANF and/or MOE funding during the plan period.

Wisconsin Shares

Wisconsin uses TANF funds to provide child care subsidies to certain individuals who are not current participants in its W-2 program. These individuals have a need for child care to participate in specific qualifying activities, including other work programs (the DCF-administered Transform Milwaukee Jobs and Transitional Jobs programs, and the DHS-administered FoodShare Employment and Training Program) and basic education, technical college, or employment-skills education programs determined by the child care eligibility agency to promote employment retention (eligibility under these provisions is limited to individuals working at least 5 hours a week and limited to a maximum of 2 years). The individual must earn less than one hundred eighty-five (185) percent of the FPL at initial eligibility and less than two hundred (200) percent FPL for continuation, and co-payments based on family size and income apply. Starting in state fiscal year (SFY) 2025, provisions set 200 percent as the single initial eligibility and phase-out threshold for Wisconsin Shares subsidies.

2017 Wisconsin Act 59 amended state law to provide that, once eligible, an individual whose income subsequently exceeds 200% FPL remains eligible until the individual's family income exceeds eighty-five (85) percent of the state median income (SMI). Wisconsin will define exceeding 85% of the SMI as the countable gross income for the assistance group exceeding that level for two consecutive months. Depending on family size, 85% of Wisconsin's SMI is estimated to equate to between 205% and 299% of the FPL. Starting in SFY 2025, the family's copayment will increase by \$1.00 for every \$5.00 by which the family's gross income exceeds 200% FPL, increasing \$1 for every \$3. As a result, the subsidy will scale down with an increase in income rather than sharply dropping at the exit threshold. This policy change is designed to reduce the experience of a "benefit cliff" following an increase in income. Wisconsin implemented the phase-out period for continuing eligibility in 2018. Wis. Stat. §49.155(1m)(c)1d.

2017 Wisconsin Act 59 also created an asset limit of \$25,000 for eligibility in the Wisconsin Shares child care subsidy program effective November 1, 2017, for new eligibility determinations and reviews on. 2017 Wisconsin Act 269 also created two new asset restrictions for Wisconsin Shares eligibility. Under the Act, an applicant's family also cannot own more than one home, which is valued at more than two hundred percent (200%) of the statewide median value for homes, excluding the value of agricultural land owned by the family. An applicant's family also cannot own any number of vehicles with a combined equity value of more than \$20,000, except vehicles used for business purposes. DCF established a hardship exemption to the asset restrictions with Wis. Admin. Code DCF 101.09(3m)(c).

Child Welfare Prevention Services

Since 2001 (pursuant to an ACF suggestion to align services with TANF purposes 3 and 4), Wisconsin has used federal TANF funds to supplement services to prevent child abuse and neglect in Milwaukee county. Specifically, DCF provides TANF funds through the Brighter Futures program. Brighter Futures supports positive youth development and prevention programs in high-risk communities and high-poverty neighborhoods. Additionally, DCF contracts with the Milwaukee Health Department to support Empowering Families of Milwaukee, a home-visiting program for pregnant women and their families, and families with infants and toddlers. Goals include improving birth outcomes and preventing child abuse and neglect. Due to the COVID-19 pandemic, home visiting moved to a virtual platform and families continued to be served by the home visiting program. Services are targeted to the eleven (11) zip code areas within Milwaukee that have the lowest income levels, high rates of child abuse and neglect referrals, and poor birth outcomes. There are no financial eligibility requirements for a family to receive these services under TANF. Therefore, Wisconsin uses one hundred (100) percent TANF funds for this program (per federal requirements relating to services for TANF purpose four).

2017 Wisconsin Act 59 modified the traditional Milwaukee Prevention Services TANF program to allow it to be used to supplement and expand the number of "Family Foundations Home Visiting" (FFHV) programs statewide—an umbrella term Wisconsin has used since 2011 for the Empowering Families Milwaukee program and programs in other counties and tribes funded from the federal Maternal, Infant, and Early Childhood Home Visiting (MIECHV) grant and associated state funds. Wisconsin believes children and

families will benefit from expanding these services to more areas and families than what can be supported through current MIECHV funding levels. FFHV uses four evidence-based models to provide expectant and new parents with voluntary supports and mentoring through their children's early years. Due to the COVID-19 pandemic, home visiting moved to a virtual platform and families continued to be served by the home visiting program. TANF funds are targeted to provide services to predominately needy families, who may be facing community violence or experiencing mental health or other challenges as well as poverty. <https://dcf.wisconsin.gov/cwportal/homevisiting>

Grants for Innovative Prevention Services

2017 Wisconsin Act 254 authorized a new program under which DCF may award grants to counties, nonprofit organizations, or tribes to fund child-abuse and neglect prevention services. Grant applicants must provide matching funds toward proposed projects and services equal to 9.89 percent of the TANF grant amount from DCF. DCF is required to evaluate the effectiveness of the grant program in achieving its stated goals and must first submit a biannual report on the evaluation to the appropriate standing committees of the legislature beginning in June 2021. Wis. Stat § 49.175(1)(uk).

Grants for Substance Abuse Prevention to At-Risk Youth

2017 Wisconsin Act 261 authorized a new TANF-funded program under the Brighter Futures statute beginning on or after July 1, 2018. Under this program, DCF must administer grants to provide evidence-based programs and practices for substance abuse prevention to at-risk youth and their families. Eligible grant recipients include nonprofit corporations or public agencies in Milwaukee County, certain county departments, other than in Milwaukee County, and federally recognized American Indian tribes or bands. DCF may not award a grant to a county or tribe that offered evidence-based programs and practices for substance abuse prevention in the preceding fiscal year, unless those services were previously funded by a grant under this program. Wis. Stats. §48.545(2)(c), and §49.175(1)(o). 2019 Wisconsin Act 9 and 2021 Wisconsin Act 58 continued to fund the Brighter Futures program.

Families and Schools Together (FAST)

FAST is an evidence-based prevention/early intervention program that connects schools, families and communities to enhance family functioning; promote scholastic success; and prevent substance abuse, delinquency and child maltreatment. The FAST Program consists of eight (8) weekly sessions during which parents and children participate in structured experiences and activities that build cohesiveness and provide opportunities for parents to strengthen their role in the family. Upon completion of the FAST program, parents are transitioned into FAST Works, a parent-led sustainability program that assists and encourages families to maintain connections with each other over the next several years.

2017 Wisconsin Act 59 authorized use of TANF funds to pilot the FAST program in five Milwaukee elementary schools chosen by the department. Wis. Stat. §49.175(1)(d). In the 2017-18 school year, 81.7% of the students in the Milwaukee School District have been identified as economically disadvantaged, meaning that they are a member of a household qualifying for free or reduced priced meals. DCF collaborated with the Milwaukee Public Schools (MPS) to select five schools identified by MPS as low-performing. Three of the five schools selected for FAST in the 2017-18 school year (and for follow-up in 2018-19) are located in the 53206 zip code, which has been identified as especially challenged. The target

population for the FAST pilot is families with pupils in 4 year old kindergarten through third grade. 2019 Wisconsin Act 9 and 2021 Wisconsin Act 58 continued to fund this program.

Homeless Case Management Services Grants

2017 Wisconsin Act 59 created the Homeless Case Management Services Grant Program that is administered by the DOA, Division of Energy, Housing and Community Resources. 2019 Wisconsin Act 9 and 2021 Wisconsin Act 58 continued to fund this program. Under the program, grantees will provide intensive case management services to homeless families. For eligibility under this program, "homeless families" means:

1. Homeless adults (age 18 or older) accompanied by minor children (under age 18 for whom the homeless adults are legally responsible, or under 19 but a full-time student in high school, working on an equivalency degree, or enrolled in basic vocational or technical education);
2. Homeless pregnant women.
3. Non-custodial parents of children under the age of 18; or
4. Individuals who are over age 18 but younger than age 25 and accompanied by another person related by blood or marriage.

Services provided may include financial management, employment supports, ensuring school continuation for children, and enrolling unemployed or underemployed parents in W-2 or the FoodShare Employment and Training Program. The Homeless Case Management Services Grant Program is funded by federal TANF. Funds must be used for services and must benefit needy families.

State Supplement to Earned Income Tax Credit

The Wisconsin Department of Revenue (DOR) administers a state Earned Income Tax Credit (EITC), which supplements the wages and self-employment income of lower-income working families. TANF funds are used only for the portion of this refundable credit actually paid out to eligible families. State funds not claimed as MOE are used to pay amounts credited to claimants but intercepted to offset debts. MOE is only claimed if state funds exceeding the 1995 level are used for the TANF-eligible refunds. Persons are eligible for the tax credit if they had at least one qualifying child residing with them, were a full-year resident of Wisconsin, and qualified for the federal EITC. The state program is funded primarily with federal TANF funds but may be funded with state funds or co-mingled funds. The DOR follows the federal earned income credit which is in effect for Wisconsin purposes. Wisconsin did not adopt section 204(c) of Public Law 116-94 relating to the disaster area provision allowing certain taxpayers to use earned income from the preceding tax year to compute the current year federal earned income credit. Therefore, if this federal provision applies to any Wisconsin residents, they must recompute their federal earned income credit using Wisconsin's definition of the Internal Revenue Code to compute the Wisconsin earned income credit.

Educational Support Services to Needy Students

DPI administers funding that assists needy families and their children through educational and non-educational programs provided through the public school system. Wisconsin anticipates claiming for MOE in the Plan period only aid programs that are highly targeted to provide enhanced services to needy families and the portion of the expenditure that is

reasonably allocable to eligible families, based on those qualifying for free-and-reduced lunch programs. Specifically:

- State-funded School Nutrition Programs (state supplemental funding for school lunch and breakfast programs, and a state funded "School Day Milk" program); and
- The Achievement Gap Reduction (AGR) Program. This program replaced the Student Achievement Guarantee in Education (SAGE) program, and only schools that previously participated in SAGE are permitted to participate in AGR. Under SAGE, DPI made grants to schools with a high percentage of low-income pupils which agreed to reduce classroom sizes and enact certain other policies. The other policies included a curriculum designed to improve academic achievement and a requirement to keep the school open every day for extended hours to make educational and recreational opportunities, as well as community and social services available in the school for all district residents.

The last SAGE contracts expired at the end of the 2017-18 school year. Under AGR, schools continue to provide highly targeted programming (intended to reduce achievement gaps) not generally available in Wisconsin public schools and will be reimbursed by DPI as a payment for each low-income pupil attending an AGR classroom. AGR schools must implement one or more of the following in K-3 classrooms:

1. Maintain the 18:1 or 30:2 pupil-teacher ratios in place under SAGE; and/or
2. Provide one-to-one tutoring by a licensed teacher; and/or
3. Provide one or more licensed teachers to offer instructional coaching.

Energy Services

DOA administers the federal Low-Income Home Energy Assistance (LIHEAP), TANF, and state funds that assist needy families (those under 60% of the State Median Income adjusted for family size) with utility and energy bills, reconnection services, crisis intervention services (e.g. furnace replacements), and weatherization services. TANF and TANF MOE funds are used only for families with children.

In-Home Safety Services

DCF administers child welfare services in Milwaukee County through the Division of Milwaukee Child Protective Services (DMCPS). DMCPS contracts with local service agencies to provide in-home safety services to children and families. DMCPS's goal is to keep families intact whenever possible by employing strategies and services that control for child safety, stabilize the family, and help the family develop links to community supports. Families receive individualized services tailored to their specific situation and needs as determined by an assessment social worker and an intensive in-home safety services manager. There are no financial eligibility requirements for a family to receive these services. Therefore, Wisconsin uses one hundred (100) percent TANF funds for this program (per federal requirements relating to services for TANF purposes three and four). In 2011 Wisconsin entered into a Child Welfare Program Improvement Plan in which it committed to expanding in-home safety services outside Milwaukee County to reduce the need for out-of-home placements. In 2021, the program served 38 counties and five Tribes.

Kinship Care

DCF provides allocations to counties and tribes to manage the Kinship Care program. The program provides monthly payments to relatives who care for minor relative children whom

CPS has determined are unsafe residing with their biological parents. Starting in SFY 2025, the monthly rate increases from \$300 to \$375. (See W-2 Manual Chapter 19.)

SSI Caretaker Supplement

DHS, which administers the state's SSI activities, also administers the SSI Caretaker Supplement (CTS) program. DHS provides an additional monthly payment to help with the support of SSI recipients' dependent children. (See W-2 Manual Chapter 19.)

Transform Milwaukee Jobs Program

The Transform Milwaukee Jobs (TMJ) program serves low-income adults in Milwaukee County. It is a subsidized-employment program under which employers are reimbursed, or partially reimbursed, for wages and benefits for a maximum of 1,040 hours worked per participant. These subsidized job opportunities provide work experience, and employers are encouraged to hire participants into permanent jobs.

Eligible individuals must: be at least age eighteen (18), or if over age twenty-four (24), must be a biological or adoptive parent or primary caregiver of a child under age eighteen (18); not be participating in a W-2 paid placement; have an annual household income below one hundred fifty (150) percent of the federal poverty limit; have been unemployed for at least four weeks; and be ineligible to receive unemployment insurance benefits. The Transform Milwaukee Jobs program targets adults who are ex-offenders, ordered to pay child support, or involved with the Child Welfare system and in need of employment as part of a family reunification plan. The TMJ program also targets youth aged eighteen (18) through twenty-four (24) who were in the foster care system at or after age 16 and need to develop job skills and work experience to become self-supporting adults living independently.

Transitional Jobs Program

Under current state law, DCF may establish a program similar to the TMJ program outside of Milwaukee County if funding is available. The program outside Milwaukee County is named Transitional Jobs. The Transitional Jobs (TJ) program shares the same eligibility criteria and target populations as the TMJ program. The Department is required to give priority to areas of the state with relatively high rates of unemployment and childhood poverty, and to other areas with special needs determined by the Department. The TJ program is available in 33 counties (Adams, Ashland, Barron, Bayfield, Brown, Burnett, Chippewa, Clark, Douglas, Dunn, Florence, Forest, Iron, Jackson, Juneau, Kenosha, Langlade, Marinette, Menominee, Oconto, Outagamie, Pierce, Polk, Price, Racine, Rock, Rusk, Sawyer, St. Croix, Taylor, Walworth, Washburn, and Winnebago) with a mix of rural and urban areas.

Wisconsin Community/Community-Building Milwaukee (CBM) Services Training Workshops

DCF contracts with Wisconsin Community Services (WCS) to provide community-building facilitator-training workshops to organizations in the city of Milwaukee that work with needy individuals who are eligible for TANF programs. The CBM initiative aims to incorporate a powerful change process called Community Building into social service, criminal justice and faith-based community programs through Community Building Workshops. Community Building is an intense interpersonal group process and experience that helps to encourage the formation and maintenance of two-parent families by promoting social and emotional learning and improves or builds on the core competencies of self-awareness, self-

management, social awareness, relationship building, and responsible decision-making skills in participants.

As a result of the COVID-19 pandemic, WCS and the CBM continues to provide most work on a virtual platform. The effectiveness of converting to a virtual platform has allowed WCS to use Community Building workshop tools and principles to develop interpersonal communication programming and skills for TANF participants. WCS will be working with local W-2 agencies to provide extensive (workforce) training with the focus on healing trauma, emotional health, and overall well-being. In addition, these skills will benefit the W-2 providers and the reduced programming efforts/needs that are provided to their participants. The workshops create an experience of safety, allowing participants to address unproductive attitudes and behaviors, and heal unresolved trauma and grief that may be driving current dysfunctional circumstances and compromised sustainable employment opportunities in our various communities and neighborhoods throughout Southeastern Wisconsin.

Fostering Futures; Connections Count

2015 Wisconsin Act 55 authorized a program under which DCF contracted with local organizations to employ trusted community members who function as “community connectors” to connect vulnerable families with pre-school-aged children (0-5) with formal and informal community resources. 2017 Wisconsin Act 59 continued this funding and authorized an additional \$200,000 in TANF funding to develop and implement a trauma-informed training curriculum that is more specific to Wisconsin's needs. 2019 Wisconsin Act 9 and 2021 Wisconsin Act 58 continued to fund this program. Wis. Stat. §49.175(1)(n).

Adult Literacy Grants

DCF is authorized to award grants to qualified applicants to provide literacy training to TANF-eligible adults. Grant recipients are required to coordinate with W-2 agencies to ensure adequate adult literacy services are available to W-2 participants. DCF has contracted with Wisconsin Literacy, Inc. through June 30, 2025. If funding continues to be made available, the contract provides for a potential two-year renewal. Wis. Stat. §49.169.

GED Services

DCF is also authorized to use TANF funding to provide General Education Development testing and preparation services to assist TANF-eligible individuals (needy parents or pregnant women) to obtain General Equivalency Degrees (GEDs).

In the 2017-19 biennium, DCF combined the GED services funding with the Adult Literacy grant to Wisconsin Literacy, Inc., as the services are closely related. As part of the combined contract, this current TANF use is anticipated through June 30, 2025, with a potential two-year renewal. Wis. Stat. §49.175(1)(v).

Grants for Civil Legal Services

Current legislation provides funding for grants to the Wisconsin Trust Account Foundation, Inc. (WisTAF), a non-profit organization established by the Wisconsin Court System. The grants may not be used for litigation against the state and may only be used to support specific civil legal services (related to domestic abuse, sexual abuse, or restraining orders

for certain at-risk elderly and disabled individuals) for otherwise TANF-eligible individuals with incomes under two hundred (200) percent FPL. This funding is also contingent on DCF review and approval of a plan to be developed by WisTAF for the use of the funds.

Skills Enhancement Grants

A program exclusively available to Wisconsin's community action agencies, the Skills Enhancement Program (SEP) provides financial assistance and supportive services to individuals who work at least 20 hours per week and whose earned income is at or below 150 percent FPL for education and training. The SEP focuses on increasing the earnings of working poor households by helping participants acquire the skills needed to obtain higher paying jobs that offer health care benefits by emphasizing short-term, demand driven, job-focused post-secondary training. The program includes access to transportation, child care, career counseling, job placement assistance, and financial support. Historically funded at \$250,000 annually from state general purpose revenue, current legislation provides for an additional \$500,000 in TANF funding for each fiscal year of the 2023-2025 biennium.

DCF contracts with Wisconsin's community action agencies on an annual basis through an application process. Community action agencies undertake outreach, initial screening, processing of applications and enrolling clients into the program. Community action agencies further enhance the success of participants by providing comprehensive support services including but not limited to providing labor market information and individualized training plans, case management, providing assistance with enrolling in approved training, referral and job search assistance. The community action agencies must ensure that the SEP meets all of the program's performance benchmarks and obtain the documentation to support the outcomes they report to DCF. Wis. Stat. s. 9.265(3)(b)11

Jobs for America's Graduates

Students need more than a diploma to be successful, especially students facing challenges like poverty, trauma, and other situations that put them at risk of learning loss and disconnection. Jobs for America's Graduates (JAG) improves social, academic, and employment skills of youth who are eligible to receive TANF in an in-school program that provides the support, connections, and training these students need to transition to adulthood. Students who take part in this program have multiple barriers that traditionally prevent students from graduating high school on time. This program is designed to specifically address those barriers. Graduating participants in this program receive 12 months of follow-up services to ensure they are successfully transitioning into employment, post-secondary education, or the military. Foundations of JAG include:

- Project Based Learning
- Employer Engagement
- Trauma Informed Care

Current legislation provides \$500,000 in TANF funding annually to expand participation in the JAG program. This additional \$500,000 results in \$1 million in total funding. Wis. Stat. s. 49.175 (1)(LM).

Wisconsin's Non-TANF Programs and Services

In addition to Wisconsin's other TANF programs and services, DCF supports a number of non-TANF programs and services, described below, that assist needy families and children.

Note: Some of these programs and services are identified as part of the state's annual determination of TANF MOE while other programs and services may not be counted for TANF MOE based on specific requirements of TANF MOE. Programs and services supported by state funding which are not identified in other sections of this Plan are described below

Substance-Abuse Screening and Testing for Work Experience Programs

2015 Wisconsin Act 55 created a program under which NCPs eligible for services (including a TEMP placement) under W-2, all applicants for the TMJ or TJ programs (described in this plan), and all NCPs ordered by a court to participate in the Children First work-experience and job-training program (also described in this plan) are required to complete a controlled-substance abuse screening questionnaire. If, on the basis of answers to the questionnaire, the administering agency determines there is a reasonable suspicion that the individual is abusing a controlled substance, the individual must undergo a drug test. Individuals who test positive for a controlled substance without evidence of a valid prescription are required to participate in a treatment program in order to remain eligible for W-2 NCP services, TMJ, TJ, or Children First. DCF is required to pay or reimburse its contractors for testing and treatment costs that are not covered by Medical Assistance (MA) or insurance in effect covering the individual. 2017 Wisconsin Act 195 also created the "Hire Heroes" program, a transitional jobs program for veterans, administered by Wisconsin's Department of Workforce Development (DWD), under which the screening, testing, and treatment requirements also apply to program applicants and participants. Wis. Stat. §49.162

Under provisions of 2017 Wisconsin Act 59, Wisconsin is expanding the required substance abuse screening, testing, and treatment as a condition of eligibility to the following W-2 paid placements: TEMP, CSJ, and W-2 T. Individuals applying for a W-2 paid placement as well as all adult members of the applicant's W-2 group whose income or assets are included in determining the individual's eligibility for W-2 will be subject to the requirements.

2017 Wisconsin Act 59 also replaces the current requirement for screening via a questionnaire with "controlled substance abuse screening," which would mean a questionnaire, a criminal background check, or any other controlled substance abuse screening method identified in administrative rule. DCF is required to promulgate administrative rule to implement the expansion to W-2 and screening changes.

DCF must use state funds to cover abuse screening, testing, and treatment costs that are not otherwise covered by medical assistance, private insurance, or another type of coverage. This program is included as a potential MOE expenditure to the extent that the expenditures are associated with eligible families as defined in this Plan.

Child Support Pass-Through

DCF administers the Child Support program. Cooperation with the child support agency is a requirement for receipt of W-2 services. The family's income from child support does not affect financial eligibility for W-2 or W-2 payments. Seventy-five (75) percent of payments for current support are passed-through to the families. Seventy-five (75) percent of payments for past-due support during W-2 participation time periods and one hundred (100) percent of

payments for past-due support for time periods without W-2 participation are passed-through to the families. (See W-2 Manual Chapters 3 and 15.)

Children First

DCF administers the Children First program, which provides employment and training services for non-custodial parents (NCPs) who are ordered by a court to participate in the program to promote their ability to pay child support and increase their involvement in the lives of their children. An NCP who meets all of the eligibility requirements for Children First and W-2 NCP services may receive both Children First and W-2 services at the same time. Some local agencies may also co-enroll Children First participants in the Food Share Employment and Training Program (FSET), which provides additional transportation and training resources. (See W-2 Manual Chapter 7.)

Case Management Follow-Up Plus (CMF+)

2017 Wisconsin Act 59 established authority for DCF to provide a worker supplement to W-2 participants that obtain unsubsidized employment and meet federal work participation requirements. These CMF+ supplemental payments are assistance provided as a separate state program with state funds to promote work. For that reason, receipt of a supplemental payment does not count toward a participant's state or federal 60-month TANF time limit and the participant's child support payments are not assigned to the state. The purpose of providing supplemental payments is to assist W-2 participants who become employed and stop receiving federally-funded assistance to transition into stable unsubsidized employment. Supplemental payments serve as an additional support for eligible families to retain employment and participate in services that may improve employment, and CMF+ allows W-2 participants who transitioned to the workforce to be included in Wisconsin's work participation rate calculations.

As of June 23, 2018, W-2 participants who gained unsubsidized employment and met minimum work participation requirements are eligible to receive a monthly \$50 supplemental payment in addition to case management follow-up services. Qualifying CMF placed W-2 participants may be eligible for the worker supplement, known as CMF+. CMF participants are W-2 participants who obtain employment while receiving W-2 services and assistance. The CMF placement makes them eligible to receive ongoing case management services for up to 12 months. CMF+ includes the same ongoing case management services as CMF, plus the \$50 supplemental payment for up to 12 months as long as participants maintain employment that continues to meet work participation requirements and meet W-2 program eligibility requirements. (See W-2 Manual Chapter 7.)

Domestic Violence Services

DCF administers state and federal funds to provide grants for domestic violence services in each county and tribal area in Wisconsin. The goals of the grant program are to: 1) provide crisis, safety, and support services for victims of domestic abuse and their children; 2) educate the community about issues related to domestic abuse; and 3) promote a coordinated community response to domestic abuse. DCF provides funding to End Domestic Abuse Wisconsin to provide training and technical assistance to domestic abuse programs and other systems. Wisconsin claims for MOE only the portion of the state-funded expenditures that are reasonably allocable to eligible families defined as at or below three hundred (300) percent of the FPL.

Burial Services

DHS administers the Wisconsin Funeral and Cemetery Aids Program (WFCAP) in Wisconsin, an assistance program to service providers who offer funeral, cremation, and cemetery services to certain decedents whose services are not fully compensated by the decedent's estate, family, or other resources. DHS reimburses funeral and/or cemetery expenses of a person who was eligible for TANF or MA services. DHS pays funeral and cemetery expenses for eligible families with state funding, which Wisconsin reports as an MOE expenditure. (See W-2 Manual Chapter 19.)

Milwaukee County Alcohol and Other Drug Abuse Services

DHS contracts for the provision of Alcohol and Other Drug Abuse (AODA) services to serve the TANF population in Milwaukee County at or below two hundred (200) percent of the FPL. Special target populations include: pregnant women; specialized minority treatment agencies including tribal agencies; intravenous drug users; correctional clients; and child welfare related service populations. DHS awarded grants for providing new or expanded community-based AODA treatment programs that meet the special needs of TANF eligible individuals based on the program's ability to emphasize parent education, vocational and housing assistance, and coordination with other community programs and with treatment under intensive care.

Emergency Homeless Shelters

Wisconsin provides state funding to a homeless shelter located in the Fox River Valley section of the state. The purpose of the funding is to assist eligible families under two hundred (200) percent of the FPL with services and shelter in order to achieve stability during severe financial hardship. Note: Wisconsin funds other family shelters in the state with federal housing funds.

Home-Visiting Programs

DCF, in collaboration with DHS, administers comprehensive home-visiting programs to expand the in-home services to needy families. These services for families at-risk focus on: improving birth outcomes; supporting maternal and child health; enhancing family functioning; promoting safety and development; and preventing child abuse and neglect.

(b) Require a parent or caretaker receiving assistance under the program to engage in work (defined by the State) once the State determines that the parent or caretaker is ready to engage in work, or once the parent or caretaker has received 24 months of assistance, whichever is earlier, consistent with the child care exception at 407(e)(2) (section 402(a)(1)(A)(ii) of the Social Security Act).

W-2's goal is to connect parents with appropriate work or work training as soon as possible. A W-2 participant is placed in the highest possible employment or work-training level according to his or her ability. As participants gain work experience and skills, they are expected to move up to the next appropriate level of work or training at the earliest opportunity. Unsubsidized employment is the goal for most W-2 participants, and applicants may be required to search for unsubsidized employment while their applications are pending. The EP includes the specific program activities for the W-2 participant to achieve

employment. These program activities focus on the participant's employment, family, and personal needs identified in assessments and screenings. (See W-2 Manual Chapter 6, W-2 Manual Appendix on Activity Codes, and information on the Employability Plan within section above.)

Ongoing Case Management and Supportive Services

The W-2 FEP provides ongoing case management for the W-2 participant, including periodic reassessment of the current placement based on circumstances at the time. The FEP works with the W-2 participant to assist in addressing family and work-related needs before situations result in a family crisis, nonparticipation in program activities, and/or loss of employment. The FEP provides information necessary to connect applicants/participants with supportive services available within the agency as well as other resources in the community. Supportive services may include housing, child care, transportation, family health care, economic supports, household budgeting, employment support needs such as work connection and retention services, and other needs identified by the participant that impede the participant's ability to find and retain a job. (See W-2 Manual Chapter 7.)

W-2 Employment positions (Work Training or Subsidized Employment placements)

The W-2 FEP may offer the W-2 applicant a work training placement (TEMP, CSJ or W-2 T), if the applicant's good-faith attempts to obtain employment have been unsuccessful, or if the W-2 agency determines that the applicant is not prepared for unsubsidized employment. While participating in a work training placement, the W-2 participant may be required to continue appropriate ongoing employment search with the assistance of the W-2 agency. (See W-2 Manual Chapter 7.)

W-2 Education and Training

W-2 emphasizes that education and training are a pathway to meaningful employment, rather than an alternative to employment. Combining work or work training activities with short-term education and training at a minimum prepares participants for entry-level employment. W-2 agencies may coordinate with the Technical College system or other educational programs to provide a variety of Adult Basic Education opportunities including literacy skills and remedial math, as well as completing a high school diploma or equivalency or certified (or diploma/degree) training program consistent with the participant's career assessment results. (See W-2 Manual Chapter 8.)

Required Hours of Participation

W-2 participants are required to participate in up to 40 hours of assigned activities per week. The number of assigned hours depends on the participant's circumstances. For CSJ participants, within the up to 40 hours per week of assigned activities, up to 10 hours per week may be in education and training activities. For W-2 T participants, within the up to 40 hours per week of assigned activities, up to 12 hours per week may be in education and training activities. (See W-2 Manual Chapter 7.)

Performance Outcomes

The performance outcomes, stated in the W-2 Contracts for the period beginning on January 1, 2013, reinforce that the focus of W-2 agencies is engage participants in work, educational attainment, and vocational training activities; assist participants in obtaining employment

with opportunities for wage increases; and support participants in maintaining long-term employment.

Work Verification Plan

Wisconsin's TANF Work Verification Plan addresses countable work activities, hours engaged in work, procedures for identifying work-eligible individuals, etc. See Wisconsin's TANF Work Verification Plan at: <https://dcf.wisconsin.gov/files/w2/tanf-state-plans/tanf-work-verification-plan-10-1-08.pdf>

Learnfare Case Management Services

Learnfare, a component of the W-2 program, requires school-age children of W-2 participants to enroll in and attend school. Learnfare also requires minor parents, habitual truants, dropouts, and returning dropouts to participate in case management. 2015 Wisconsin Act 55 extended the requirement to participate in case management to children whose parents were assigned to a CSJ, W-2 T, or TEMP placement but were unable to participate in required activities due to the child's school-related problems. 2017 Wisconsin Act 59 revised the Learnfare statute to require children to attend school regularly and not be a habitual truant. A habitual truant is defined as a student absent from school without an acceptable excuse for part or all of five or more days on which school is held during a semester. Learnfare case management focuses on services to maintain school enrollment, improve school attendance, and prepare children for a career. A family's monthly W-2 payment could be sanctioned if a child is not enrolled in school or is a habitual truant, refuses to cooperate with Learnfare case management, has no good cause granted, and has not requested a Fact Finding Review. (See W-2 Manual Chapter 16.)

Employment Transportation Services

Wisconsin has made it a priority to work with job seekers, employers, and local service providers to address transportation needs for low income families. (See W-2 Manual Chapter 19.)

W-2 Two-Parent Household Participation

W-2 philosophy strongly emphasizes the responsibility both parents have to care for and support their children. (See W-2 Manual Chapter 14.)

(c) Ensure that parents and caretakers receiving assistance engage in work in accordance with section 407 (section 402(a)(1)(A)(iii) of the Social Security Act). Consistent with the required strategic elements discussed in section II (a)(2) herein, provide a specific analysis of how the State's workforce development activities are addressing employment and training services for parents or caretakers receiving assistance.

Intensive Case Management

To ensure that parents eligible for W-2 are engaged in work activities, the W-2 program provides intensive case management and supportive services, such as child care, transportation, housing, and other services that address the parent's family and work-related needs.

Participation in Work Activities

The W-2 program encourages parents to engage in work activities by providing strengths-based and family-centered services that are consistent with the parents' interests and goals. Parents may be assigned to participate in work activities as a condition of receiving assistance payments. W-2 agencies include parents in the decision-making process to identify appropriate work activities. (See W-2 Manual Chapter 1.) W-2 agencies also encourage parents to engage in work activities by tracking the eligible parents' time limits and discussing the impact of time limits with applicants and eligible parents. (See W-2 Manual Chapter 2.)

W-2 agencies meet with each eligible parent to review assigned activities and the parent's progress toward meeting the established goals. W-2 agencies also complete an EP review with each eligible parent as often as necessary based on the eligible parent's circumstances. The W-2 agencies consider the parent's progress in assigned activities in the agencies' future decisions regarding placement and activity assignment. (See W-2 Manual Chapter 6.)

W-2 agencies verify and track a parent's attendance in assigned activities based on Wisconsin's TANF Work Verification Plan. (See W-2 Manual Appendix on TANF Work Participation Requirements.) See Wisconsin's TANF Work Verification Plan at: <https://dcf.wisconsin.gov/files/w2/tanf-state-plans/tanf-work-verification-plan-10-1-08.pdf>

In accordance with work requirements under 42 U.S.C. 602(a)(1)(B)(iv) and consistent with the exception provided in section 607(e)(2), Wisconsin requires W-2 participants not exempt from work requirements due to temporary incapacitation to engage in work activities beginning the first month of assistance. Section VII(b) above addresses Wisconsin's requirements for a parent or caretaker receiving assistance under the program to engage in work.

The W-2 program utilizes workforce development activities to address employment and training services for parents in the following ways:

Career Services: In order to connect parents to relevant and tailored career pathways that will help them receive the training and credentials needed to obtain jobs with family-sustaining wages, all W-2 applicants and participants complete a career assessment during the informal assessment process as well as throughout ongoing case management. There is a wide array of career assessments tools that W-2 agencies and job seekers use to obtain greater awareness about how a participant's work styles, skills, and interests can be used to define a career path, assign meaningful activities, highlight strengths, identify training needs, and match the participant to fulfilling work activities and employment opportunities. While W-2 agencies are able to choose the career assessment tools that they feel best measure work styles, skills, and interests, some agencies choose to use the Department of Workforce Development's Career Exploration online tool.

If an applicant is new to W-2 or is re-applying and does not have career assessment results documented, an assessment must be scheduled within 30 days of application and completed within 30 days of placement. If an applicant has completed a career assessment that identifies work styles, skills, and interests, and wants to remain on the career path

indicated by that assessment, or is already working in a field available in the local labor market, another career assessment does not need to be completed.

Based on the results of the career assessment and career planning with a Financial and Employment Planner, W-2 participants' Employability Plans (EP) shall include both long-term and short-term career goals with action steps, objectives, and the appropriate combination of services and training needed to achieve each goal.

Training Services: W-2 participants are assigned to education and training activities that will prepare them for careers available in local job markets.

Education and vocational assessment tools are used in combination with career assessment tools to identify the education and training needed to help individuals obtain employment that fits their work styles, skills, and interests. Results from these assessments are used in tandem to better inform the development of effective EPs and assignment of meaningful work and education and training activities, including adult basic education, technical college education, and job skills training, including customized job skills training.

Educational needs assessment tools, like the Test of Adult Basic Education (TABE) or Wide Range Achievement Test (WRAT), test skills and aptitudes in reading, language, math computation, and applied math in order to identify current math and reading comprehension levels and any literacy or numeracy deficiencies. W-2 agencies use the educational needs assessment results to provide participants with appropriate education activities including, but not limited to, a course of study meeting the standards established under Wis. Stat. 115.29(4) for the granting of a declaration of equivalency of high school graduation; English as a Second Language, and adult basic education courses. Agencies also use the educational needs assessment results to match eligible adults to appropriate technical college courses and other educational courses that provide an occupational skill. The agencies are required to work with technical colleges to offer certified (or diploma/degree) training programs. Regardless, the training courses must be tied directly to occupations for which there are job openings in the local labor market. Contractors also use the educational needs assessment results to match eligible adults to appropriate job skills training, including customized skills training.

Vocational assessment tools help individuals living with a disability establish realistic vocational goals and a plan to achieve them. The vocational evaluation process is designed to assess the unique strengths, resources, and experiences of an individual in order to match that person's abilities and preferences to appropriate work placements, jobs, or training programs. The process is interactive; the intent is for staff to learn about the participant and the participant to learn about themselves.

In W-2, agencies use education and vocational assessments to match participants to job skills (or vocational) training programs. These programs must lead to one of the six listed credits, credentials, certificates, or degrees listed below.

1. Credits or a credential earned from a Wisconsin-based eligible training provider, as defined by the Workforce Innovation and Opportunity Act (WIOA) Statewide List of Eligible Training Programs and Providers (including Continuing Education Credits);

2. A license, recognized by the State or Federal Government;
3. A certificate of apprenticeship completion;
4. A certificate of completion of a program approved by the Office of Skills Development through a Fast Forward or Blueprint for Prosperity grant; (For more information about Fast Forward and Blueprint for Prosperity grants, please visit [www.wisconsinfastforward.com/.](http://www.wisconsinfastforward.com/))
5. Completion of a customized training established with an employer(s) with the written understanding that the employer(s) will make a good faith effort to hire the participant upon successful completion of the training; or
6. A bachelor's or associate degree.

Agencies are required to have available a wide range of jobs skills training programs, including customized job skills training programs. The customized job skills training programs include employer participation in the design and implementation of the training. Customized job skills training programs are designed using industry-approved training requirements and in alignment with known career pathways in the local labor market. When necessary, agencies match eligible parents to bridge programs so that they can attain the basic skills they need to enter job skills training programs. Regardless, agencies must ensure that parents who complete training have acquired marketable job-specific skills.

Business Services: W-2 agencies actively help applicants and eligible parents find employment in the local labor market. In order to effectively do this, agencies have business service units within their agencies, and employ job developers, often referred to as Account Executives, Business Services Managers, Employer Account Representatives, etc.

Most W-2 agencies are co-located at the local Job Center. Job Centers have Business Services Teams (BST) that coordinate activities and resources with Job Center partners to provide comprehensive high quality, customer centered services to employers. Business Services Teams include Workforce Innovation and Opportunity Act core program representatives as well as other combined state plan partners. Where the W-2 agency is co-located in the Job Center the business service unit is part of the Job Center's BST.

In W-2, job development is the process of creating job opportunities for W-2 participants by researching, identifying and soliciting commitments from possible sources of employment. Job developers have a thorough knowledge of local labor market information, including high-growth industries and career paths that exist within those industries. They coordinate with members of the BST to identify employers within local area industry that are best prepared to work with the W-2 population. They understand local industry trends and occupations and have capacity to engage with employers to assist in meeting their recruitment needs. Finally, they identify the skill-sets local industries need and apply related skill development to work experience and job skills training programs.

W-2 agencies provide the following work activities to W-2 participants:

- Individualized job readiness services including
 - Career and vocational assessments;
 - Career exploration and planning;
 - Jobs readiness assessments;

- Job readiness instruction, including soft skill development;
- Interviewing skills and mock interviews;
- Job coaching;
- Resume review and updating; and
- Job search instruction and assistance, including applying for jobs online.
- Additional work activities include:
 - Work experience;
 - On-the-job training;
 - Job coaching;
 - Employment retention services, and
 - Advancement services.

W-2 agency staff also provide the following services:

- Research the local labor market and contact employers to create job opportunities that are appropriate for local W-2 applicants or eligible parents;
- Match individual applicants or eligible parents to jobs in the area;
- Arrange job interviews and provide post interview follow up with both the parent and the local employers;
- Provide access to clothing for interviews;
- Identify and develop work experience sites to better prepare those participants who have some work skills but are not yet prepared to succeed in unsubsidized employment;
- Organize job fairs; and
- Work with W-2 agencies' Community Steering Committees as well as general business and sector-specific associations and local workforce development boards to avoid duplication of workforce services, improve employer access to skilled workers, exchange best practices, and collaborate on funding opportunities.

In addition to the work activities and services listed above, W-2 participants also benefit from the services provided to employers through the BSTs.

Penalties/Payment Reductions

CSJ and W-2 T participants must participate in all assigned work training activities or education and training activities outlined in the EP. Payments for CSJ and W-2 T participants who fail to participate in assigned activities are reduced for hours missed without good cause. To encourage parents to engage in work activities, the W-2 program requires parents to notify the W-2 agency of the reason for the parent missing any assigned W-2 activity. The W-2 agency determines if a parent's reason for missing an assigned activity meets a W-2 good cause reason based on good cause policy. If the parent misses an assigned activity without good cause, the W-2 agency applies an hourly payment reduction for each instance. (See W-2 Manual Chapter 11.)

Refusal to Participate

A W-2 participant assigned to a W-2 employment position (CSJ, W-2 T, or TEMP position) may become ineligible for any facet of W-2 for three (3) months if, without good cause as determined by the Department, the W-2 participant fails to appear for an interview with a prospective employer (including a sponsor of work experience or subsidized employment)

or for an assigned work activity, voluntarily leaves employment or training activities or a work-experience site without good cause, is discharged from employment or training or a work-experience site for cause, or demonstrates through other behaviors or actions defined by the Department through administrative rule that he or she refuses to participate. Additionally, a W-2 participant may become ineligible if residing with the other parent of a child and receiving child care assistance, if the other parent is neither disabled nor caring for a severely disabled child and the other parent refuses to work in subsidized or unsubsidized employment or other work-experience, job-training, or community-service activities prescribed by the Department.

Intentional Program Violations

The penalties for intentional program violations (IPVs) help ensure parents provide accurate information about their work activities to W-2 agencies.

Wis. Stat. § 49.001(3m) defines an intentional program violation as:

“... intentionally making a false or misleading statement, intentionally misrepresenting or withholding facts, or intentionally committing any act that constitutes a violation of state or federal law for the purpose of using, presenting, transferring, acquiring, receiving, possessing, or trafficking benefits under this chapter.”

An individual who applies for or receives assistance payments under W-2, Wisconsin Shares Child Care, EA, and/or JALs and commits an intentional program violation for the purpose of establishing eligibility, maintaining eligibility, or increasing assistance payments, will be denied assistance as follows:

- For six months for the first intentional program violation;
- For one year for the second intentional program violation; and
- Permanently for the third intentional program violation.

(d) Take such reasonable steps as the State deems necessary to restrict the use and disclosure of information about individuals and families receiving assistance under the program attributable to funds provided by the Federal Government(section 402(a)(1)(A)(iv) of the Social Security Act).

Existing Wisconsin statutes and W-2 policy restrict the use and disclosure of information about individuals and families receiving assistance under the program. W-2 policy restrictions on the use and disclosure of information about individuals and families focus on when disclosure is necessary for administration of the W-2 program or law enforcement purposes. (See W-2 Manual Chapter 4.)

In addition, DCF restricts access to data stored in CARES, Wisconsin’s eligibility determination and case management system, by requiring state authorized access to the system depending upon each user’s job responsibilities. For more information, contact [DCF Security](#) regarding DCF’s Information Technology Security Management Policy.

(e) Prevention and Reduction of Out-of-wedlock and Adolescent Pregnancies
Establish goals and take action to prevent and reduce out-of-wedlock

pregnancies, with special emphasis on teenage pregnancies (section 402(a)(1)(A)(iv) of the Social Security Act).

The W-2 program and the programs referenced in this section include TANF-funded programs and services that have established goals and take actions to prevent and reduce the incidence of out-of-wedlock pregnancies, with special emphasis on adolescent pregnancy prevention, adolescent parent self-sufficiency, adolescent pregnancy counseling, and adolescent parenting skills. In addition, Wisconsin provides funding for other services, which coordinate with the TANF services, to reduce unintended pregnancies.

W-2 Program's Prevention and Reduction of Out-of-wedlock and Unintended Pregnancies

Although minor parents living outside of an adult-supervised living arrangement are not eligible to receive a W-2 payment, W-2 agencies are required to provide case management services to minor parents (both male and female parents), regardless of their income, assets, or living arrangement. These case management services are required to include discussions of family planning, career planning, and parenting skills.

In addition, the following elements of the design of the W-2 program implements Wisconsin's goals to prevent and reduce out-of-wedlock pregnancies in the population served by W-2:

1. Flat grants: W-2 provides payments based on participation, not family size.
2. Family cap: W-2 does not treat parents who have additional children while on assistance differently for W-2 time limits. Parents caring for a child who is younger than eight weeks old may be eligible to receive a monthly payment for their living expenses that does not include a work requirement. However, parents receiving such payments are exempt from the state lifetime limit only if the child is born less than ten months after the individual was first determined eligible for W-2 or if the child was the result of sexual assault or incest.
3. Case management: W-2 FEPs may counsel participants to delay subsequent births or provide referrals to family planning services. FEPs assist participants in making choices about their career and family, make appropriate referrals based on the family's needs, and encourage the use of resources available to families. Each W-2 agency maintains a list of family-planning referral agencies and health care providers which is available to all customers.

Boys and Girls Club

DCF provides grants to Boys and Girls Clubs (BGC) to operate two programs in Wisconsin. TANF funds from DCF are used to fund the Wisconsin After 3 program, and the BE GREAT: Graduate program. Funds are provided to the Boys and Girls Club of Fox Valley (BGCFV), who acts as the fiscal agent, and distributes funding to other clubs providing programs throughout the state.

Wisconsin After 3

Boys and Girls Club provides a program to support afterschool programming focused on improving fluency in reading and math and career preparation for low-income youth. Services provided through this program are the Stride Online Learning Academy, NBA Math

Hoops, Power Hour/Homework Help, and Career Launch. These services focus on study habits, intensive tutoring in math and English, and exposure to career options and role models.

BE GREAT: Graduate

BGC provides the BE GREAT: Graduate afterschool program focused on increasing academic achievement, school engagement, and college and career readiness among low-income youth identified as being at risk of dropping out of high school.

BE GREAT: Graduate follows the evidence-based Check and Connect program model, which links each student with a Graduation Coach to provide weekly interactions with a positive adult and includes intentional efforts to establish a connection between each student's school, parents, and BGC.

Brighter Futures

Under the administration of DCF, the Brighter Futures program awarded grants to private nonprofit and public agencies in Milwaukee County, and county social services agencies in other counties, and tribes. These grants, which fund programs for the prevention of non-marital pregnancy, youth violence, substance use and abuse, and child abuse and neglect, and the promotion of self-sufficiency for pregnant adolescents and adolescents who are parents. Brighter Futures supports positive youth development and prevention programs in high-risk communities and high-poverty neighborhoods. Programs serve infants, children, youth, and families, and focus on increasing adolescent functioning by encouraging high school graduation, vocational preparedness, improved social and other interpersonal skills, and responsible decision-making. The agencies establish their goals and performance metrics based on the evidence-based curriculum and strategies utilized in the program

Healthiest Wisconsin 2020 Plan

DHS, in coordination with DPI and DCF, developed the following strategies for Wisconsin to address adolescent pregnancy prevention: encourage and promote delayed sexual activity, and provide access to confidential contraceptive and related reproductive health services. These strategies are consistent with the Healthiest Wisconsin 2020 Plan, the current State Public Health Plan.

The Healthiest Wisconsin 2020 Plan highlights the importance of: reproductive and sexual health, comprehensive sex education, and better access to clinical services to reduce the rates of adolescent and unintended pregnancies. Wisconsin established three statewide goals to reduce rates of unplanned pregnancies, especially adolescent pregnancies:

1. Establish a norm of sexual health and reproductive justice by measuring the percentage of sexually active high school students who reported that they or their partners had used a condom during their last sexual intercourse (Youth Risk Behavior Survey [YRBS]);
2. Establish social, economic, and health policies that improve equity in sexual health and reproductive justice; and
3. Reduce the disparities in reproductive and sexual health experienced among populations of different races, ethnicities, sexual identities and orientations, gender identities, and educational or economic status as measured by HIV/STD Surveillance and YRBS data.

See Healthiest Wisconsin 2020 at:

<https://www.dhs.wisconsin.gov/statehealthplan/index.htm>

Medicaid Family Planning Services

DHS administers Family Planning Only Services, which is a Medicaid-funded program for persons aged 15 years and older who:

1. Have income that does not exceed three hundred and six (306) percent of the FPL; and
2. Are not enrolled in full benefit coverage from Medicaid or BadgerCare, Wisconsin's health services for low-income families.

The Medicaid Family Planning Services provides selected family-planning services, including free contraceptive services and supplies, routine preventative primary services that are family-planning related, tests for abnormal cervical cells (Pap tests), and tests and treatment for sexually transmitted diseases and voluntary sterilizations for women and men 21 years or older.

(f) Prevention of Statutory Rape and Other Sexual Assault Conduct a program, designed to reach State and local law enforcement officials, the education system, and relevant counseling services, that provides education and training on the problem of statutory rape so that teenage pregnancy prevention programs may be expanded in scope to include men.

DCF, DPI, and DHS in partnership with the Wisconsin Coalition Against Sexual Assault (WCASA) and the Department of Justice (DOJ), work cooperatively to prevent statutory rape, other sexual assault, and adolescent pregnancies. These education and training services, in addition to other services, are designed to reach various professions, including state and local law enforcement officials, the education system, and relevant counseling services ranging from prevention to enforcement based on the needs identified by Wisconsin's communities.

Over the years Wisconsin's adolescent sexual assault prevention and adolescent pregnancy prevention services have evolved to a strengths-based focus on promoting well-being, healthy relationships, sexual health, and self-esteem. The scope for these services includes both males and females.

An example of services implemented across Wisconsin Departments includes DPI's collaboration with DHS and DOJ to create and post an electronic publication describing the circumstances under which educators are required to report sexual activity among adolescents as possible child abuse. A second example is DCF's collaboration with DOJ and DHS to update W-2 program policy to comply with state statutes that require use of the legal substitute address assigned to individuals enrolled in the state's address confidentiality program. This program, known as Safe at Home, aims to protect individuals who fear for their safety such as victims of sexual assault.

Comprehensive services across professions include implementation of the Wisconsin Statutes requirement that Child Protective Services (CPS) agencies refer all cases of suspected or threatened child sexual abuse to law enforcement. Local law enforcement

agencies and CPS coordinate the planning and execution of the investigation of the report. Any law enforcement agency that determines criminal action is necessary refers the case to the District Attorney for criminal prosecution. The CPS Access and Initial Assessment Standards describe the statutory requirements and practice guidelines for CPS agencies to enhance collaboration with law enforcement agencies in response to reports of sexual abuse, as well as reports of other forms of child maltreatment. (See the DCF CPS Access and Initial Assessment Standards at:

<https://dcf.wisconsin.gov/files/cwportal/policy/pdf/access-ia-standards.pdf>

(g) Prevention of Access to Assistance in Electronic Fund Transactions

Implement policies and procedures as necessary to prevent access to assistance provided under the State program funded under this part through any electronic fund transaction in an automated teller machine or point-of-sale device located in a place described in section 408(a)(12), including a plan to ensure that recipients of the assistance have adequate access to their cash assistance (section 402(a)(1)(A)(vii) of the Social Security Act).

Wisconsin issues payments via paper check or via Electronic Funds Transfer (direct deposit into participants' bank accounts). In order to prevent access of TANF-funded assistance under any electronic funds transfer in prohibited locations, Wisconsin has: 1) published an operations memo informing its W-2 Agencies of prohibited locations and transactions; 2) included a flyer, available in English, Spanish, or Hmong, as part of the application and eligibility-review processes to ensure that the FEP discusses the information with participants; and 3) mailed a notice October 2014 to all then-current W-2 participants (who would not have received the brochure at intake) informing them of the prohibited locations for using their cash assistance. (See W-2 Manual Chapter 1.)

(h) Access to Assistance with No or Minimal Fees/Charge Ensure that recipients of assistance provided under the State program funded under this part have the ability to use or withdraw assistance with minimal fees or charges, including an opportunity to access assistance with no fee or charges, and are provided information on applicable fees and surcharges that apply to electronic fund transactions involving the assistance, and that such information is made publicly available (section 402(a)(1)(A)(viii) of the Social Security Act).

As stated in (g) above, Wisconsin issues payments via paper check or via Electronic Funds Transfer (direct deposit into participants' bank accounts). W-2 Policy requires the FEP to discuss the possible fees that may be associated with Electronic Funds Transfer with the participant before the participant signs the Electronic Funds Transfer form, which is required to provide bank routing information. By signing the Electronic Funds Transfer form, participants also acknowledge that their W-2 worker talked to them about the possible monthly fees, customer service fees, inactivity fees, and paper statement fees. If a participant is chronically overdrawn or owes fees associated with their negative account balance, the participant may choose to receive their payment via paper check. (See W-2 Manual Chapter 10.)

(i) Residence Indicate whether the State intends to treat families moving into the State from another State differently than other families under the program, and if so, how (section 402(a)(1)(B)(i) of the Social Security Act)

Wisconsin does not treat families moving into the state from another state differently from other families under the program; however, it does verify the amount of time in the TANF program in the other state to assure compliance with the federal 60-month lifetime time limit on receipt of TANF. (See W-2 Manual Chapter 2.)

(j) Citizens and Non-citizens Indicate whether the State intends to provide assistance to non-citizens and if so, include an overview of such assistance (section 402(a)(1)(B)(ii) of the Social Security Act)

Wisconsin does not provide assistance under the program to individuals who are not citizens of the United States or are not qualified non-citizens. Eligible individuals who are qualified non-citizens receive the same assistance through W-2 and EA as citizens of the United States. W-2 policy is consistent with federal and state definitions and other laws regarding qualified non-citizens. (See W-2 Manual Chapter 2 and EA Manual Chapter 4.) However, under the Wilson Fish TANF Coordination program, DCF's W-2 Refugee Programs Liaison provides ongoing case management, including adapting and facilitating access to employment and training services and support for eligible refugees receiving W-2 cash assistance in order to promote self-sufficiency and integration. The Liaison partners with W-2 agency FEPs to conduct initial eligibility assessments, intake appointments, and needs assessments for each member of a refugee family.

(k) Fair and Equitable Treatment Set forth objective criteria for the delivery of benefits and the determination of eligibility and for fair and equitable treatment, including an explanation of how it will provide opportunities for recipients who have been adversely affected to be heard in a State administrative or appeal process (section 402(a)(1)(B)(iii) of the Social Security Act).

Wisconsin has established objective criteria for the delivery of benefits, determination of eligibility and for fair and equitable treatment. Wisconsin's objective criteria for the delivery of cash assistance include:

- Maximum payment amounts for W-2 program placements;
- Payment issuance;
- Electronic Funds Transfer;
- Overpayment recovery; and
- Payment reductions.

(See W-2 Manual Chapters 10 and 11 and information on Penalties/Payment Reductions.)

Wisconsin's objective criteria for the establishment of eligibility include nonfinancial and financial eligibility. (See W-2 Manual Chapters 2 and 3 and information on W-2 Eligibility.)

Due to the variety and needs of each of the TANF programs in this section, there are different complaint resolution processes for program eligibility and participation. For TANF programs within DCF, there generally is an informal step first to resolve the issue quickly and with cooperation. When this process does not resolve the issue, there is a formal resolution process(see W-2 Dispute Resolution Process below). For TANF programs provided by other Wisconsin Departments, each Department has its own complaint resolution process.

Labor Standards

Fair and equitable treatment of W-2 participants is addressed by the labor standards for all W-2 employment and work training sites (for TEMP, CSJs, and W-2 Ts) and require compliance with all federal, state, and local laws, ordinances, and regulations affecting W-2 participants, including requirements for safe and healthy work environments(see W-2 Manual Chapter 9).

W-2 Dispute Resolution Process

There are two levels of review under the W-2 Dispute Resolution process: 1) a Fact Finding Review; and 2) a Departmental Review.

The purpose of the Fact Finding Review is to resolve disputes for applicants and participants who disagree with a W-2 agency's decision. This includes decisions regarding all W-2 services, including Learnfare, JALs, and EA. An individual or a W-2 agency may request a Departmental Review if either disagrees with a Fact Finding decision.

(See W-2 Manual Chapters 12 and 15.)

Civil Rights, Affirmative Action, and Complaint Resolution

Each W-2 agency must meet Civil Rights Compliance and Affirmative Action requirements, which include processes for resolution of complaints. Complaints must be filed within one hundred and eighty (180) days for discrimination complaints. Civil rights investigations are to be completed within ninety (90) days of when the complaint is filed. However, investigations may take longer depending upon the need for additional information from the complainant or other parties involved in the complaint.

The Wisconsin Departments and/or their provider agencies administer all of the state programs included in this Plan. These Departments are DCF, DOA, DHS, DPI, and DOR. All of these Departments and their provider agencies are required to meet state and federal Civil Rights Compliance and Affirmative Action requirements. (See W-2 Manual Appendix on W-2 Agency Civil Rights Obligation.)

(I) Elder Care Indicate whether the State intends to assist individuals to train for, seek, and maintain employment (Section 402(a)(1)(B)(v) of the Social Security Act)—:

(1) Providing direct care in a long-term care facility (as such terms are defined under section 1397j of this title); or (2) In other occupations related to elder care, high-demand occupations, or occupations expected to experience labor

shortages as, determined appropriate by the State for which the State identifies an unmet need for service personnel, and, if so, shall include an overview of such assistance.

The W-2 program provides assistance to eligible individuals to train for, seek, and maintain employment that includes providing direct care in a long-term care facility (as terms are defined for the TANF program under section 1397j of Title IV-A of the Social Security Act). The W-2 program's job skills training, work experience, and job retention services provided for TEMP, CSJ, and W-2 T participants often include training and employment services for Certified Nursing Assistants (CNAs), home health aides, and other personal and health care aide positions. The W-2 program's case management services provide ongoing employment retention services for positions that include CNAs, home health aides, and other personal and health care aides.

Additionally, Wisconsin has a program that requires state agencies with 100 or more full-time equivalent positions to annually prepare and implement a plan to hire W-2 participants. State agencies with fewer employees are encouraged to participate in the program as well. A primary goal of the W-2 employment program is to ensure that W-2 customers are enabled to become economically self-sufficient. Together with DCF, the DOA Division of Performance Management provides resources and support to agencies to recruit, assess, certify and retain W-2 participants. W-2 participants are commonly hired for positions related to providing direct care in a long-term care facility, including positions under the following classification titles: nursing assistant, nurse clinician, resident-care technician, and psychiatric-care technician.

DCF will coordinate with DHS's Bureau of Aging and Disability Resources and the Department of Workforce Development (DWD) to plan for and help address Wisconsin's current and ongoing shortage of health care workers for the increasing elder population. The goal of this coordination is to proactively identify geographic movement within Wisconsin of the elder population and the workers who provide health care services, eldercare labor shortage issues, and other eldercare issues. DCF will share this information with W-2 agencies. W-2 agencies are required to keep informed of local economic trends and provide employment services, including job skills training and job development, based on those trends.

(m) MOE-funded Services Provide for all MOE-funded services the following information: the name of the program benefit or service, and the financial eligibility criteria that families must meet in order to receive that benefit or service. In addition, for TANF MOE-funded services (co-mingled or segregated MOE) describe the program benefit provided to eligible families (SSP services do not have to include a description but the Department of Health and Human Services encourages it) (§263.2(b)(3) & §263.2(c) preamble pages 17826-7).

See Section VII(a) of this Plan.

TANF Certifications

Wisconsin will operate a program to provide TANF: so that children may be cared for in their own homes or in the homes of relatives; to end dependence of needy parents on government benefits by promoting job preparation, work, and marriage; to prevent and reduce the incidence of “out-of-wedlock” pregnancies and establish annual numerical goals for preventing and reducing the incidence of these pregnancies; and to encourage the formation and maintenance of two-parent families. This program generally is known as Wisconsin Works (W-2).

States that include TANF in the Combined State Plan must provide a certification by the chief executive officer of that State, that during the fiscal year, the State will:

1. Wisconsin’s TANF Program

Specify which state agency will administer and supervise the program in part (a) in all political subdivisions of the State:

- DCF administers and supervises the program in all political subdivisions of the State;

2. Child Support

Operate a child support enforcement program under the State plan approved under part D (section 402(a)(2) of the Social Security Act);

3. Foster Care and Adoption Assistance

Operate a foster care and adoption assistance program under the State plan approved under part E, and that the State will take such actions as necessary to ensure that children receiving assistance under such part are eligible for medical assistance under the State plan under title XIX (section 402(a)(3) of the Social Security Act);

4. Administration

Specify which State agency or agencies will administer and supervise the program referred to in paragraph (1) for the fiscal year, which shall include assurances that local governments and private sector organizations (section 402(a)(4) of the Social Security Act)—

(A) have been consulted regarding the plan and design of welfare services in the State so that services are provided in a manner appropriate to local populations; and

(B) have had at least 45 days to submit comments on the plan and the design of such services;

5. Equitable Access

Provide each member of an Indian tribe, who is domiciled in the State and is not eligible for assistance under a tribal family assistance plan approved under Section 412, with equitable access to assistance under the State program funded under this part attributable to funds provided by the Federal Government (section 402(a)(5) of the Social Security Act);

6. Program Fraud and Abuse

Establish and enforce standards and procedures to ensure against program fraud and abuse, including standards and procedures concerning nepotism, conflicts of interest among individuals responsible for the administration and

supervision of the State program, kickbacks, and the use of political patronage (section 402(a)(6) of the Social Security Act);

7. Domestic Violence (42 U.S.C. 602(a)(7)) Optional Certification

[x] The State has established and is enforcing standards and procedures to:

- Screen and identify individuals receiving assistance under this part with a history of domestic violence while maintaining the confidentiality of such individuals;
- Refer such individuals to counseling and supportive services; and
- Waive, pursuant to a determination of good cause, other program requirements such as time limits (for as long as necessary) for individuals receiving assistance, residency requirements, child support cooperation requirements, and family cap provisions, in cases where compliance with such requirements would make it more difficult for individuals receiving assistance under this part to escape domestic violence or unfairly penalize such individuals who are or have been victimized by such violence, or individuals who are at risk of further domestic violence.

Wisconsin TANF Certification Requirement from the Consolidated Appropriations Act of 2022

CERTIFICATION THAT THE STATE WILL PROVIDE INFORMATION TO VICTIMS OF SEXUAL HARASSMENT OR SURVIVORS OF DOMESTIC VIOLENCE, SEXUAL ASSAULT, OR STALKING (Section 402 (a)(8) of the Social Security Act):

(A) In general. A certification by the chief executive officer of the State that the State has established and is enforcing standards and procedures to:

- (i) ensure the applicants and potential applicants for assistance under the State program funded under this part are notified of assistance made available by the State to victims of sexual harassment and survivors of domestic violence, sexual assault, or stalking;
- (ii) ensure that case workers and other agency personnel responsible for administering the State program funded under this part are trained in:
 - a. the nature and dynamics of sexual harassment and domestic violence, sexual assault, and stalking;
 - b. state standards and procedures relating to the prevention of, and assistance for, individuals who are victims of sexual harassment, or survivors of domestic violence, sexual assault, or stalking; and
 - c. methods of ascertaining and ensuring confidentiality of personal information and documentation related to applicants for assistance and their children who provided notice about their experiences of sexual harassment, domestic violence, sexual assault, or stalking;
- (iii) ensure that, if a State has elected to establish and enforce standards and procedures regarding the screening for, identification of, domestic violence, sexual assault, or stalking pursuant to paragraph (7):
 - a. the State program under this part provides information about the options under this part to current and potential beneficiaries and;

- b. case workers and other agency personnel responsible for administering the State program funded under this part provided with training regarding State standards and procedures pursuant to paragraph (7).

Wisconsin helps families with low-incomes achieve self-sufficiency through the Wisconsin Works (W-2) program. All W-2 applicants receive written information about domestic violence which describes the resources and protections available to applicants and participants who are the survivors of domestic violence. Posters with similar information are posted in common areas of all W-2 agencies. In 2023, language will be added to the written information to address sexual harassment, sexual assault, and stalking.

The Wisconsin Works Programs (WWP) Informal Assessment includes a screening section that assesses participants for domestic violence, sexual assault, and stalking. The screener is offered to every W-2 participant prior to the initial W-2 placement. W-2 agency workers provide supportive resources to survivors of domestic violence based on the results of the screener. Participants may decline to answer without risk of sanction or case closure. The screener is offered again at six-month intervals until completed or until the participant is no longer in a W-2 placement. The participant may also request to revisit the screener at any time. Agency workers explain how participant information will be kept confidential. Wisconsin exempts survivors of domestic violence from child support cooperation requirements.

All agency workers who directly work with applicants and participants must take a state designed and delivered training that covers the nature and dynamics of domestic violence. The topics of sexual harassment, sexual assault and stalking will be added to this training and an updated course will be ready by January 1, 2024. W-2 agencies must work closely with individuals for whom domestic violence is an issue to ensure that these individuals are receiving appropriate services. Workers should explain to participants the good cause exemption from program rules, available resources, and finding support to overcome the barriers they face. Additionally, survivors of domestic violence may receive a time-limit extension if there is an identified need to continue receiving W-2 services.

45-day Public Comment Period

This WIOA State Combined Plan TANF Section was available for public comment for 45 calendar days, January 12, 2024 – February 27, 2024.

Certified by the designee of the Chief Executive Officer of the State of Wisconsin:

Emilie Amundson
Secretary, Wisconsin Department of Children and Families

Date

Glossary of Acronyms

AODA	Alcohol and Other Drug Abuse
ARP	At Risk Pregnancy
BOS	Balance of State
BMCW	Bureau of Milwaukee Child Welfare
CMC	Custodial Parent of an Infant
CMD	Case Management Denied
CMF	Case Management Follow-Up
CMF+	Case Management Follow-Up Plus
CMJ	Case Management for Job Ready Individuals
CMM	Case Management for Minor Parents
CMN	Case Management for Non-custodial Parents
CMP	Case Management for Pregnant Women
CMU	Case Management for Unsubsidized Employment
CNA	Certified Nursing Assistant
CPS	Child Protective Services
CSA	Child Support Agency
CSJ	Community Service Job
CTS	SSI Caretaker Supplement
DOA	Department of Administration
DMCPS	Division of Milwaukee Child Protective Services
DCF	Department of Children and Families
DHS	Department of Health Services
DOJ	Department of Justice
DPI	Department of Public Instructions
DOR	Department of Revenue
EA	Emergency Assistance
EP	Employability Plan
FPL	Federal Poverty Level
FEP	Financial and Employability Planner
IPV	Intentional Program Violation
JAL	Job Access Loan
MOE	Maintenance of Effort
MPCP	Milwaukee Parental Choice Program
NCP	Non-Custodial Parent
PPSCP	Parental Private School Choice Program
PRWORA	Personal Responsibility and Work Opportunity Reconciliation Act of 1996
SMART	Skills Mastery and Resistance Training
SSDI	Social Security Disability Insurance
SAGE	Student Achievement Guarantee in Education

TANF Section, WIOA Combined Plan 2024

SSI	Supplemental Security Income
TANF	Temporary Assistance for Needy Families
TEMP	Trial Employment Match Program
TJ	Transitional Jobs
TMJ	Transform Milwaukee Jobs
W-2	Wisconsin Works
W-2 T	W-2 Transition
WCASA	Wisconsin Coalition Against Sexual Assault
WFCAP	Wisconsin Funeral and Cemetery Aids Program
WISH	Wisconsin Interactive Statistics on Health
YRBS	Youth Risk Behavior Survey