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TO: **Income Maintenance Supervisors
Income Maintenance Lead Workers
Income Maintenance Staff
W-2 Agencies
Training Staff
Child Care Coordinators**

FROM: Janice Peters, Director
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Division of Family Supports

DFS OPERATIONS MEMO					
No:	07- 34 (Corrected) 08/20/2007				
DATE:	07/03/07				
FS	<input type="checkbox"/>	MA	<input type="checkbox"/>	SC	<input type="checkbox"/>
CTS	<input type="checkbox"/>	CC	<input checked="" type="checkbox"/>	W-2	<input checked="" type="checkbox"/>
FSET	<input type="checkbox"/>	EA	<input type="checkbox"/>	CF	<input type="checkbox"/>
JAL	<input type="checkbox"/>	JC	<input type="checkbox"/>	RAP	<input type="checkbox"/>
WIA	<input type="checkbox"/>	Other	EP	<input type="checkbox"/>	*
PRIORITY: HIGH					

SUBJECT: Wisconsin Works (W-2) and Child Care Program Eligibility Verification

CROSS REFERENCE: State Statute 49.155 (1m) and 49.145 (2)(k); DWD 12.09 and DWD 12.11; Operations Memos 06-32; 04-64; 03-46; 98-82 W-2 Manual chapter 2, 3, 4 and Appendix VIII; Day Care Manual Chapter 2

EFFECTIVE DATE: Immediately

PURPOSE

This Operations Memo informs Wisconsin Works (W-2) agencies of the documentation required to support eligibility determinations for applicants of W-2 and Child Care (CC) and provides a list of examples of documents that may be used to verify eligibility criteria.

BACKGROUND

As part of its 2006 single audit, the Legislative Audit Bureau found that some case files did not contain adequate documentation to support W-2 and Child Care eligibility determinations. The Department of Workforce Development (DWD) agreed to review items used to verify and document W-2 eligibility.

Operations Memo 04-64 listed the items that must be verified during the W-2 and Child Care eligibility determination process. This Operations Memo provides a list of eligibility criteria along with sources of verification that agency staff may use to verify W-2 and Child Care eligibility.

To strengthen the system of consistent retention of and access to case file information, the Department of Health and Family Services (DHFS) and DWD have implemented the use of the Electronic Case File (ECF), in part as a means to ensure consistent retention of eligibility verification information. Documents that are used in the eligibility determination process must be scanned and saved in the ECF.

POLICY

ITEMS THAT MUST BE VERIFIED DURING W-2 AND/OR CHILD CARE ELIGIBILITY DETERMINATION

The list below identifies the non-financial and financial eligibility requirements that must be verified during the W-2 eligibility determination process.

- Identity
- Age
- WI Residency
- US Citizenship
- Alien Status
- Marital Status
- Custody of Children
- Social Security Number
- Earned Income
- Unearned Income
- Assets
- Child Support Cooperation

Items that must be verified during Child Care eligibility determination are:

- Identity
- Age
- WI Residency
- US Citizenship or Qualified Alien Status (for child if parent is non-citizen)
- Marital Status
- Social Security Number for parents if they are citizens or Qualified Aliens or SSN for child if parents are not citizens or Qualified Aliens
- Earned Income
- Unearned Income
- Child Support Cooperation
- Approved Activity/employment

CASE FILE REVIEW

Eligibility must be documented in sufficient detail to allow a reviewer to easily substantiate the accuracy of the determination. When the W-2 agency is notified by a Regional Office Administrator that a particular case has been selected for review, the W-2 agency is required to scan all documents that were used to substantiate the W-2 eligibility decision into the ECF within 10 business days. Instructions for where to file items in ECF can be found in the ECF manual at the following web address: <http://www.emhandbooks.wi.gov/ecf/>

Some of the Eligibility Criteria may be self-declared, such as Custody of Children and Marital Status. Self-declaration is achieved through signature on the *Wisconsin Works (W-2) and Related Programs Application* or the Combined Application Form (CAF). If any of these items are contradicted by another source of verification the Financial and Employment Planner (FEP) must request additional information to substantiate the eligibility determination.

SOCIAL SECURITY NUMBERS

Providing or applying for a Social Security Number (SSN) is a condition of eligibility per Wisconsin Statute 49.145(2)(k) and DWD 12.09 (2)(L); any person who requests public assistance but does not provide an SSN or apply for one will not be eligible for W-2 services. SSN's and personally identifiable information will be used only for the direct administration of the program.

Under regulations set forth by the Privacy Act, each time the Social Security Number is requested, the individual must be informed that disclosure is mandatory for eligibility determination, how the number will be used and under what statutory or other authority the number is being requested. A sample statement follows:

Provision of your SSN or cooperation in applying for a SSN is required to determine eligibility for Wisconsin Works (W-2). The number you provide to the agency will be verified through a computer matching program to monitor compliance with program regulations and for program management. Wisconsin Statutes 49.145 (2)(k).

A Privacy Act statement is included on all DWD forms that request the disclosure of the Social Security Number.

VALIDATING ELIGIBILITY CRITERIA THROUGH VERIFICATION ITEMS

Validation may be done through:

- Taking a photocopy of an original document and then scanning it into ECF;
- An Income and Eligibility Verification System (IEVS) match report;
- A query response from Systematic Alien Verification for Entitlements (SAVE);
- A CARES birth query result.

Each item used in the W-2 and Child Care eligibility determination process must be documented. Photocopies of verification items should be marked with the date the document was obtained along with the initials of the staff person who obtained the document.

If the document that was used to validate eligibility is scanned into ECF, or if the validation occurred through a CARES data exchange, case comments to document how the eligibility criteria were verified are not necessary. However, when there is no original or copy of the document such as when there is a collateral contact, FEP observation, a home visit, or a verbal statement, a CARES case comment should contain enough information to describe the nature and source of the information should any follow up be required.

MARKING VITAL RECORDS, "ADMINISTRATIVE USE ONLY"

Vital records are maintained by the Wisconsin Department of Health and Family Services and are official records of births, deaths, marriages, and divorces. These documents are referred to as Birth Certificates, Death Certificates, Marriage Certificates, and Divorce Certificates. A certified birth certificate has a registrar's raised, embossed, impressed or multicolored seal, registrar's signature, and the date the certificate was filed with the registrar's office, which must be within 1 year of the stated birth. Every time an official vital record is used in the eligibility determination process, it must be marked, "Administrative Use Only" per Wis. Stat. s 69.30 (2).

Prior to scanning these documents, the FEP must photocopy the original document, stamp it with "Administrative Use Only" and then scan the photocopy into ECF. Originals must not be scanned into ECF, but must be returned to the W-2 or Child Care applicant.

Certificates of Naturalization and Certificates of Citizenship are not considered vital records, but must be treated as vital records as these are also official documents.

VERIFICATION

The agency may request any information that is necessary and appropriate in order to make a correct eligibility decision. However, do not verify an item that is not required or is not questionable.

When an agency receives contradictory information regarding any of the eligibility criteria, the agency should request documentation to substantiate the applicant's claim and allow the applicant seven business days to obtain to obtain such documentation. The agency may extend the seven business day time limit for up to 30 calendar days from the initial request when compliance with the time limit is unduly burdensome as determined by the agency.

If the applicant is unable to produce the requested verification items, or requires assistance to do so, the W-2 agency must assist the applicant in obtaining the verification. To do this, the agency may need the applicant's signature on a written *Release of Information* form to obtain the information from a third party. If the applicant is able to produce the information, but refuses or fails to do so, no eligibility shall exist.

The applicant must be informed in writing of the verification items that are needed along with a due date. If the individual has made a reasonable effort and cannot obtain the information, the application must not be denied based upon the information that could not be obtained. Instead the agency must use the available information to process the case and then reassess the case when the requested information is received.

VERIFY ONLY ONCE

There are a number of items that must be verified only once, such as:

- Identity,
- Social Security Number,
- Birth Date, and
- Citizenship.

In this instance, *Verify Only Once* means once per lifetime. To assure that these items are only verified once, the FEP must scan copies of the documents used to verify these items in the ECF in the appropriate folder based upon the document type. When an applicant approaches an agency for services and if these items are known to CARES, the worker will need only to view these documents in the ECF and enter case comments documenting that these items were viewed in the ECF and previously known to CARES.

Other eligibility criteria should be reviewed at every eligibility review and when new information is reported or received through a data exchange.

SOURCES OF VERIFICATION FOR EACH ELIGIBILITY ITEM

The chart below provides a list of eligibility criteria along with suggested sources of verification that may be used to substantiate the eligibility for Wisconsin Works (W-2) or Child Care. The list of sources to verify an eligibility item is not exhaustive, but provides a sampling of the possible resources.

Eligibility Criteria	Suggested Sources of Verification
Identity (verify identity only once)	Driver's License
	State Issued ID Card
	Employee ID Card
	Student ID Card
	US Government ID Card
	Military ID Card
	Native American ID Card issued by a Federally recognized tribe
	Any photo ID document issued by USCIS
	US Passport
	CARES birth query (Wisconsin Births only)
	Paycheck displaying the applicant's name
	Any unexpired immigration document
	Any other reliable document that verifies identity
Age (verify the birth date only once)	Certified copy of Birth Certificate (must be marked "For Administrative Use")
	Hospital Birth Record
	Driver's License
	US Passport
	State Issued ID Card
	Certificate of Naturalization (must be marked "For Administrative Use")
	Certificate of Citizenship (must be marked "For Administrative Use")
	Native American ID Card issued by a Federally recognized tribe
	CARES birth query (Wisconsin Births only)
	Any unexpired immigration document
	Any other reliable document that verifies birth date
Wisconsin Residency (verify residency each time a change is made)	Lease agreement
	Utility bill for water, gas, electricity, or telephone that includes name and address
	Mortgage receipt
	Subsidized housing program approval
	Weatherization program approval
	Pay check stub including name, address, employer's name, address and phone number
	Wisconsin Driver's License
	Wisconsin ID card
	Signed statement from a shelter or individual providing temporary residence
	Wisconsin Motor Vehicle registration
	Special Note: Do not require residence verification for homeless or migrant assistance groups newly arrived to the area
	Any other reliable document that verifies Wisconsin residency

U.S. Citizenship (verify citizenship only once)	Certified copy of Birth Certificate (must be marked "For Administrative Use")
	Baptismal Certificate if place of birth is shown
	Hospital Birth Record
	CARES birth query (Wisconsin Births only)
	Native American ID Card or other tribal membership documentation issued by a Federally recognized tribe
	Certificate of Naturalization (should be marked "For Administrative Use")
	Certificate of Citizenship (should be marked "For Administrative Use")
Alien Status	Please see W-2 Manual Chapter 2.2.1.1 and Chapter 20
Marital Status	Self Declaration/signature on CAF is acceptable if no other source is available
	Certified copy of Marriage Certificate (must be marked "For Administrative Use")
	Judgment of Divorce
Custody of Children	Self-declaration/signature on CAF is acceptable unless contradicted by another source of verification
	KIDS child support disbursement query
Social Security Number	Social Security Card
	Pay stub displaying the Social Security Number
	W-2 Tax Form displaying the Social Security number
	Form SS-5, Application for Social Security number
	Verbal statement of the Social Security Number
	IEVS Match
	Other reliable documents displaying both the name and SSN
Earned Income	Paycheck stubs
	Letter from employer stating earnings
	Self-employment business tax records
	Self-employment Income Report (DWSP-2131)
	CARES data exchange/UI query
	Any other document that verifies earned income
Unearned Income	Social Security Award Letter
	Unemployment Compensation Award Letter
	Divorce paperwork identifying a financial settlement
	Documentation of Court Awarded compensation
	Compensation Award Letter
	Veteran's Administration Award Letter
	CARES data exchange
	Any other document that verifies unearned income

Assets	Bank Statement
	Kelly Blue Book information for vehicle value
	Real Estate Deed
	Mortgage Document
	Any other document that verifies stated assets
Child Support Cooperation	The determination of Child Support cooperation rests with the Child Support Agency (CSA). The CSA notifies the W-2 agency of non-cooperation through a CARES and KIDS interface that issues an alert to the worker to re-run eligibility when a change in cooperation status has occurred.
School Attendance	School attendance report
	School enrollment document
Approved Activity	Employment or assigned W-2 activity (Employability Plan)
	HSED, GED, High School for parents under 20 yrs old

CONTACTS

For Policy Related Questions: BW-2 Regional Office Staff

For CARES Processing Questions: W-2/CC Call Service Center

*Program Categories – FS – FoodShare, MA – Medicaid, SC – Senior Care, CTS – Caretaker Supplement, CC – Child Care, W-2 – Wisconsin Works, FSET – Food Stamp Employment and Training, CF – Children First, EA – Emergency Assistance, JAL – Job Access Loan, JC - Job Center Programs, RAP – Refugee Assistance Program, WIA – Workforce Investment Act, Other EP – Other Employment Programs.

DWD/DWS/BW2/RMP