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TO: Income Maintenance Supervisors
Income Maintenance Lead Workers
Income Maintenance Staff
W-2 Agencies
Workforce Development Boards
Job Center Leads and Managers
Training Staff
Child Care Coordinators

FROM: Janice Peters, Director
Bureau of Wisconsin Works
Division of Family Supports

DFS OPERATIONS MEMO

No: 07-48

DATE: 08/20/2007

FS	<input type="checkbox"/>	MA	<input type="checkbox"/>	SC	<input type="checkbox"/>
CTS	<input type="checkbox"/>	CC	<input 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: Elimination of Case Management Services (CMS) Wisconsin Works (W-2)
Placement Type

CROSS REFERENCE: W-2 Manual Chapter 7
Operations Memos 04-34, 05-54, 06-29, 07-38
Administrator's Memo 04-20

EFFECTIVE DATE: August 20, 2007

PURPOSE

The purpose of this memo is to provide information on the establishment of the Job Search Community Service Job (CSJ), transitioning from the Wisconsin Works (W-2) program Case Management Services (CMS) placement type.

BACKGROUND

Since the beginning of the W-2 program, the Unsubsidized Employment rung of the W-2 ladder has included persons who are currently unemployed but are capable of obtaining immediate full time employment. Unemployed individuals "ready for unsubsidized employment" have been placed on the Unsubsidized Employment (UE) rung of the W-2 ladder and coded as Case Management Services (CMS).

DWD is issuing a new policy establishing the Job Search CSJ, transitioning from the CMS placement type as well as providing guidance regarding placing unemployed individuals on the W-2 ladder to reflect a recent court decision.

POLICY

DETERMINING FINANCIAL AND NONFINANCIAL ELIGIBILITY

All persons applying for the Wisconsin Works (W-2) program must meet nonfinancial and financial eligibility requirements before a decision is made to place the individual on the W-2 ladder. While this is the case, there are several nonfinancial eligibility requirements upon which emphasis must be made for persons who are currently unemployed but are capable of obtaining immediate full time employment.

First, the unemployed participant who is determined to be ready for unsubsidized employment must have made a good faith effort, within 180 calendar days immediately preceding application, to obtain employment or has not refused any bona fide offer of employment, including a job quit.

Second, the unemployed participant who is determined to be ready for unsubsidized employment must have cooperated with the efforts of a Wisconsin Works agency to assist the individual in obtaining employment. This provision is only applicable if the individual had applied for W-2 within the 180 days immediately preceding the current application.

Third, these individuals must also cooperate with pre-eligibility job search requirements as a condition of W-2 eligibility.

If an individual fails to meet one of the nonfinancial or financial eligibility tests or fails to complete up-front job search activities, he or she may be denied W-2 services. This eligibility determination process may take up to 12 days from the date an individual applies for W-2.

An individual who does pass the nonfinancial and financial eligibility tests must be placed on the most appropriate rung of the W-2 ladder.

PLACEMENT ON THE W-2 LADDER AND GUIDANCE ON PROVIDING SERVICES

The CMS placement type for W-2 has been eliminated. Even with the elimination of this placement type, the current policy of placing an eligible individual on the highest rung of the W-2 ladder still exists; however, the highest rung that can be considered for an unemployed individual who meets all nonfinancial and financial eligibility criteria is a Trial Job. Given the low number of Trial Job placements, Financial and Employment Planners (FEPs) must consider placing these individuals in a Community Service Job (CSJ) placement.

While DWD is eliminating the CMS placement type and requiring placement in one of the other W-2 employment positions, it recognizes the need to allow agencies the flexibility and discretion in developing a service strategy that best serves the W-2 participants in its geographic area. This is particularly true in rural areas where geographic limitations exist. At the same time, DWD strongly believes that with consistent, intensive, focused job search assistance, this population can experience rapid attachment to the workforce. For these reasons, DWD has developed the following guidance that will assist agencies in creating a service strategy that meets the needs of this particular population of W-2 participants and facilitates rapid attachment to the workforce.

Regardless of the W-2 placement for these unemployed individuals, weekly contact with these participants is required to discuss job search results and strategize ongoing job search efforts, including updating the Employability Plan. Preferably the contact would be face-to-face, but may be by phone in geographic areas in which this would create undue burden on its participants.

GUIDANCE ON SERVING UNEMPLOYED W-2 PARTICIPANTS CAPABLE OF OBTAINING IMMEDIATE EMPLOYMENT

DWD requires all W-2 agencies to provide a variety of types of CSJs that differ by target population, duration, activity mix, and employability goals. Examples of such specific types of CSJs are:

1. *Soft-Skills CSJs*, focusing mainly on strengthening the day-to-day behaviors necessary to find and retain employment, e.g., time management skills, interpersonal skills, etc.
2. *Work Experience CSJs* focusing mainly on worksite behaviors and expectations, and establishing a positive “work” history.
3. *Occupational Skills CSJs* focusing mainly on learning a specific occupation (also referred to as job skills or vocational training CSJs).

Individuals appropriate for one of the three types of CSJs listed above are unemployed and have barriers that prevent them from obtaining employment, e.g., lack of skills necessary to obtain employment, physical or mental conditions or other personal limitations which require time and flexibility to be resolved or stabilized, etc. For more information on these types of CSJs, see [Administrator's Memo 04-20](#).

With the elimination of the CMS placement type, another example of a CSJ type has been developed:

4. *Job Search CSJ* focusing mainly on accelerated employability through intensive job search.

Individuals appropriate for this type of CSJ are unemployed but have the characteristics that suggest they would be able to obtain employment, with intensive, focused job search services to assist in identifying employment options. Persons placed in a CSJ with a job search focus may have some of the following characteristics:

- No barriers to work other than those that can be addressed through supportive services;
- Capable of working;
- A steady and/or recent work experience; and
- An education or training background that allows the individual to compete for available jobs in the unsubsidized labor market.

Expectations in a Job Search CSJ

W-2 Participant Expectations: Once child care is secured, the participants will be required to participate in assigned activities, including:

- Attending structured job search activities;
- Following up on job leads;
- Meeting with their FEP; and
- Completing the assignments as outlined in their Employability Plan (EP).

W-2 Agency Expectations: Within the Job Search CSJ type, W-2 agencies should offer intensive, focused job search services to participants on a regular basis. While agencies currently provide a blend of job search services and other types of work training services to *all* W-2 participants, those participants in the Job Search CSJ type should receive only intensive job search services geared toward rapid workforce attachment. Specifically, this means that agencies should consider the following when developing a strategy to serve these unemployed participants:

- Assigning the maximum hours of job search activities. In the first two weeks of the placement, this would mean up to 40 hours. After the first two weeks, no more than 30 hours of job search activities may be assigned. It is expected that unemployed W-2 participants who are deemed ready for unsubsidized employment would be assigned the maximum number of hours allowed under the W-2 statutes based on their level of job readiness and the absence of any barriers.
- Provide quality, intensive job search services, including assistance with:
 - ✓ Establishing employment goals;
 - ✓ Providing information about job openings;
 - ✓ Contacting employers on the individual's behalf;
 - ✓ Arranging job interviews with employers;
 - ✓ Writing a resume;
 - ✓ Completing job applications;
 - ✓ Improving job interviewing skills;
 - ✓ Providing bilingual support for job contacts and interviews; and
 - ✓ Developing networking skills.
- Provide facilitated job search services on a regular basis for each CSJ participant with a job search focus. These services may be provided by the W-2 agency staff or its subcontracted representatives. While it is up to each agency to define "regular basis," ideally the participant would be receiving facilitated job search services on a daily basis. In areas presenting geographic limitations, agencies should design a strategy that allows for facilitated job search for at least half of the participant's assigned hours.

- Require face-to-face, weekly meetings with the FEP to discuss job search results and strategize ongoing job search efforts, including updating the Employability Plan.
- Designate specialized FEPs trained to work with the participant to facilitate immediate attachment to employment by using local labor market information, employability screening, career and educational assessments and other informal and formal assessment information when developing the EP.
- Develop specialized job development strategies that make direct connections with employers and build ongoing relationships with them, including:
 - ✓ Connecting career paths with local high-growth industries;
 - ✓ Identifying employers within an industry or the community that are best equipped to work with the W-2 population;
 - ✓ Determining what skill sets local industries need for the entry level workers; and
 - ✓ Understanding changing trends within industries and occupations and engage employers based on this understanding.
- Reassess the appropriateness of the CSJ job search focus after 60 days in the placement type and implement one of the options described below in the [EXITING A JOB SEARCH CSJ](#) section.
 - *NOTE:* The 60-day timeframe is geared toward *initial* placements on the CSJ rung of the ladder, e.g. initial W-2 placement or movement from CMC or W-2 T to CSJ. If an individual is already in a CSJ placement with one of the other types of focus, e.g., work experience, job skills training, and then successfully demonstrates progress in developing needed employment skills, the FEP may once again shift the focus back exclusively to job search activities, but this time the focus must not last more than four weeks. See [Operations Memo 07-38](#) for more information on this best practice.

Exiting a Job Search CSJ

If, during the Job Search CSJ, the participant is able to obtain employment, the participant should be moved to the Case Management Follow-up (CMF) placement. In the event part-time employment is obtained, the participant may be placed in a pro-rated CSJ based on the current pro-rated CSJ policy found in the [W-2 Manual, Section 7.4.1.4.2](#).

If the participant is unable to find unsubsidized employment within 60 days, the FEP must reassess the appropriateness of the intensive job search focus of the placement as well as the overall CSJ placement. It is expected that if the participant does not obtain employment within 60 days, his or her time in the Job Search CSJ will have provided more information to the FEP regarding the individual's capability of obtaining employment.

Based on the information gathered during the reassessment, the FEP has a number of options regarding the participant's future in W-2.

1. Retain the individual in the Job Search CSJ.
2. Retain in a CSJ, but refocus the placement on one of the other three CSJs types.
3. Consider placement in a Trial Job or W-2 T. A change in placement must be supported by a thorough informal assessment as well as a formal assessment for a W-2 T placement.

4. In the event of noncooperation with job search requirements, end W-2 eligibility. See [Operations Memo 04-34](#), [Operations Memo 05-54](#) and [Operations Memo 06-29](#) for a description of the steps a FEP must take prior to closing a case for noncooperation. It is important to note here that if an individual does not provide good cause or rectify the deficiency, failure or other behavior within the 7 day timeframe as required for case closures due to noncooperation, the FEP should let the case close. The agency is not required to extend the due date. In addition, if the person reapplies for W-2 after the case closure, he or she may be held to the W-2 nonfinancial eligibility requirements described in the Determining Financial and Nonfinancial Eligibility section above.

OTHER IMPACTS OF ELIMINATING THE CMS PLACEMENT TYPE

The Division of Family Supports (DFS) is aware that there are a variety of impacts based on the elimination of the CMS placement type. Therefore, the following guidance is being provided to address specific issues.

W-2 Applicants Requesting Case Management Services Only and Declining a Paid Placement

While it is likely that applicants applying for job search assistance will also want to receive a cash payment, there may be some situations in which an applicant declines the cash payment, but would still desire the job search assistance. One reason for declining the cash payment may be the applicant's unwillingness to assign his or her child support over to the state. If this is the case, the agency should refer the participant to the FoodShare Employment and Training (FSET) program.

In addition, the applicant may be eligible for Job Access Loan (JAL) to assist him or her in looking for a job.

Ending a W-2 Paid Placement When Employment is Obtained

Under the new policy, the FEP must verify that the participant has obtained employment **prior** to placing him or her in the CMF placement and then verify the wages and hours once the employment begins. If the participant loses his or her job, he or she must be quickly reassessed and placed in a W-2 paid placement and offered other appropriate services. Currently policy states that prior to placing an individual in Case Management Follow-up (CMF) after obtaining employment, the FEP must verify with the employer that the participant has actually begun to work and validate the wages and hours.

Ending a Custodial Parent of an Infant (CMC) Placement

When ending a CMC placement, a FEP must contact CMC participants as they approach their CMC end date to discuss employment and supportive service needs once the placement ends. FEPs can no longer consider a CMS placement for these transitioning participants. Depending upon an informal assessment, the FEP must place the participant on the most appropriate rung of the W-2 ladder. If the participant is not employed, the highest rung that may be considered is a Trial Job. If the participant is employed and is returning to a job, the FEP can place the participant in the CMF placement type even if the participant has not yet returned to work, but must then verify wages and hours once the employment begins. If the CMC participant does not respond to the worker's attempts to contact him or her, the FEP may close the case.

The noncooperation case closure procedures outlined in [Operations Memo 06-29](#) do not apply to this type of case closure.

CARES PROCEDURES

W-2 Placement Types: On CARES screen WPWW, FEPs must use the “CSJ” code when placing someone in the Job Search CSJ.

W-2 Activity Codes: A new activity code (also referred to as Status/Component Codes) has been created in order to track individuals in the Job Search CSJ type. The JOB SEARCH CSJ (“CJ”) activity code must be posted on CARES screen WPCS when a participant is determined appropriate for the Job Search CSJ type. When a participant exits this type of CSJ, the FEP must enter an actual end date for W-2 activity code CJ on CARES screen WPCH. In addition to posting CJ, FEPs must use the existing job search related activity codes when assigning job search activities to these participants.

ACTION STEPS

Effective immediately, FEPs cannot place applicants or participants in the CMS placement. In addition, agencies should be taking steps to reassess existing CMS placements and reassigning these individuals to a more appropriate W-2 placement type. Agencies can use WPFN to identify existing CMS placements that need to be reassessed. In addition, there are reports located on Webl in the W-2/FSET Monitoring folder. For example, agencies may use the *DWSCDW - RP740P - W2 Placement & Activities Report - CMS Placements* report to identify CMS cases that need to be reassessed. Agencies must complete this reassessment no later than 14 calendar days from the issuance date of this Operations Memo.

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 – FoodShare 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.