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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 Working Families
Division of Family and Economic Security

DFES OPERATIONS MEMO					
No:	09-36	REVISED			
DATE:	MAY 27, 2009				
FS	<input type="checkbox"/>	MA	<input type="checkbox"/>	BC+	<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 checked="" type="checkbox"/>
RAP	<input type="checkbox"/>	WIA	<input checked="" type="checkbox"/>	Other	<input type="checkbox"/> *
				EP	
PRIORITY: HIGH					

SUBJECT: W-2 and WIA Coordination

CROSS REFERENCE: DWD DET Administrator's Memos [9-01](#) and [9-02](#);
W-2 Manual Chapter 7;
Operations Memos 09-08, 07-55, 07-38, and 06-45

EFFECTIVE DATE: Immediately

PURPOSE

This memo provides guidance to W-2 agencies on collaboration with Workforce Development Boards (WDB) and other agencies that administer Workforce Investment Act (WIA) programs for the co-enrollment of participants in both programs. The American Recovery and Reinvestment Act (ARRA) has increased funding for WIA Youth, Adult, and Dislocated Worker programs. This funding is intended to provide opportunities for summer employment and year-round activities for Youth participants and additional WIA services for Adult and Dislocated Worker enrollees. Some W-2 participants may be appropriate for co-enrollment in the WIA program.

BACKGROUND

The Department of Children and Families (DCF) is partnering with the Department of Workforce Development (DWD) to deliver WIA services to W-2 participants. W-2 agencies are encouraged

to collaborate with local WIA service providers to offer coordinated employment and training services.

POLICY

Local agencies must work directly with the local WDBs and WIA providers to refer individuals to these opportunities. Please visit DWD's website at <http://dwd.wisconsin.gov/recovery/> for more information about ARRA and how funding has been distributed.

Individual assessment results will identify W-2 participants that will be appropriate candidates for co-enrollment with WIA. Within the WIA program, W-2 participants may be enrolled in Adult or Youth services. The WIA Youth services are available to individuals through 24 years of age and will include summer paid work experience opportunities for the period of May 1, 2009 through September 30, 2009. W-2 participants may also be eligible for WIA Adult services. The WIA agency will decide the types of services to be provided to eligible individuals under the Adult or the Youth funding category.

In any situation of paid work experience the following W-2 placement and CARES processing instructions will apply.

W-2 Placement Options

The W-2 placement decision will depend on the individual's assessment results and his or her scheduled work hours. Under the ARRA funding increase, WIA paid work experience assignments may vary from 20 to 35 hours per week for a period of 6 to 8 weeks, with a possible extension. Use the following policy as a guideline for placement decisions.

WIA Paid Work Experience Assigned Fewer than 30 Hours per Week

A prorated CSJ placement is appropriate for W-2 participants who are co-enrolled with WIA in a paid work experience in which 10 to 29 hours per week are scheduled. Participants working up to nine hours per week are to remain in a full CSJ placement.

W-2 Case Management services for individuals in prorated CSJ placements may include, but are not limited to:

- Assistance in creating a financial plan;
- Providing information about unsubsidized job openings;
- Arranging job interviews with employers;
- Contacting prospective employers on the individual's behalf; or
- Assessing possible eligibility for a job access loan.

WIA Paid Work Experience Assigned 30 or More Hours per Week

Participants assigned to 30 or more hours per week are to be offered follow up services and placed in the Case Management Follow-up (CMF) placement. During the CMF placement, the W-2 agency should continue to work closely with the participant to help connect that person to a permanent full time unsubsidized job when the paid work experience ends. In addition, case management services during the CMF placement may include, but are not limited to:

- Employment skills training;
- English-as-a-Second Language classes if it is determined that the course will facilitate the individual's efforts to retain employment;
- A course of study meeting the standards for granting a declaration of equivalency of high school graduation; or

- Other remedial education courses.

If the participant refuses case management services and the CMF placement, the FEP must document the refusal in case comments. Given the temporary nature of the paid work experience, W-2 agencies should strongly encourage the CMF placement and fully explain the benefits of staying connected to the W-2 agency.

When the work experience ends or the participant discontinues participation, he or she must be immediately reassessed to determine the appropriate services and placement for the individual. Following completion of a paid work experience as part of WIA activities it may be most appropriate to return the individual to a CSJ placement.

Employability Plan (EP)

In most cases the W-2 EP will mirror the WIA Plan. FEPS must work with the participant and their WIA case manager to develop a coordinated plan.

CARES and CWW

Below are the relevant CARES changes and CWW instructions for W-2 and WIA co-enrollment.

New Activity Codes

Two new Activity Codes have been created to identify paid work experience.

SW - Paid Work Experience in the public sector, not funded by TANF

Valid for the following program: W-2, CF

This is a supervised paid work training activity in a public sector organization such as a government entity in which the subsidized wages to the participant are provided by a source other than TANF funds.

This activity includes activities conducted by the W-2 agency or other work training provider to prepare a participant for a specific work site. The job site must have a training site supervisor.

The program funding agency must provide Worker's Compensation and Unemployment Insurance.

For W-2: Hours reported count toward the work training requirement for a W-2 participant in a CSJ or W-2 T placement.

For Federal Work Participation: Hours count as "Core".

SZ - Paid Work Experience in the private sector, not funded by TANF

Valid for the following program: W-2, CF

This is a supervised paid work training activity in a private sector entity in which the subsidized wages to the participant are provided by a source other than TANF funds.

This activity includes activities conducted by the W-2 agency or other work training provider to prepare a participant for a specific work site. The job site must have a training site supervisor.

The program funding agency must provide Worker's Compensation and Unemployment Insurance.

For W-2: Hours reported count toward the work training requirement for a W-2 participant in a CSJ or W-2 T placement.

For Federal Work Participation: Hours count as “Core”.

Tracking Activities and Participation in CARES

WPCS: On CARES screen WPCS enter the corresponding activity code to indicate the assigned activity. It is critical that the work activity phases are recorded accurately on WPCS/WPCH. In order to accurately represent the date a new activity begins, follow instructions found in the *Wisconsin CARES Guide, Section 2 – Work Programs, Chapter 06, Version 3 – Posting Statuses and Components* for posting the S-Scheduled and A-Actual Phases for each activity on WPCS/WPCH. The FEP must:

- Report the Scheduled Phase of an activity when the W-2 participant is scheduled to participate in the activity, and the exact start date is known.
- Report the Actual Phase of an activity only after the activity has been verified to have actually begun. The BEGIN DATE on WPCS is the actual start date of the activity. Activities have started even if the participant fails to show up. The FEP should update from the Scheduled to the Actual phase to process non-participation on WPNH if the participant misses the first day of the activity.
- See Operations Memo 07-55 for additional instructions.

WPNP: SW and SZ are non-sanctionable activities. If the participant is in a pro-rated CSJ placement, other activities assigned in addition to the SW or SZ activity are sanctionable and must be entered on WPNP. Continue to record non-participation for one day at a time as described in Operations Memo 06-45. The non-participation hours should be entered for the same date the missed activity was assigned on the participant’s EP.

When the weekly non-participation hours (including good cause hours) recorded on WPNH are subtracted from the weekly scheduled hours recorded on WPCS/WPCH, the resulting number should be equal to weekly actual hours found in the participation documentation received for assigned activities.

WPEH: Enter the paid work experience on WPEH; however paid work experience may not be claimed as an “entered employment”.

CWW Employment Page

On the CWW Employment page, use the “I” code (WIA) in the Employment Type field to indicate that the wages are funded by WIA. Using this code will allow CARES to automatically make the correct financial eligibility determination for all programs of request.

WIA earnings are disregarded for W-2, Child Care, and FoodShare, but are counted as unearned income for BadgerCare Plus.

Federal Work Participation

Individuals that remain in the prorated CSJ placement during WIA co-enrollment will be included in the work participation rate. The Activity Code SW or SZ will be treated in the same manner as the WE code for federal reporting purposes.

To document the participation rate of individuals working part time the initial hours of employment may be documented by an Employer Verification Letter or phone call to the employer if a verification letter cannot be obtained. From this initial documentation, a projection of work participation may be projected for up to 6 months. Subsequent documentation of work hours will be documented by photocopies of the equivalent of two weeks pay stubs which must be collected not less than every six months. Actual hours must include all hours for which the participant was paid. Please refer to Operations Memo 07-55 and its attachment.

Individuals in a CMF placement during co-enrollment with WIA will not be included in the Federal Work Participation rate because they are not receiving cash assistance.

Earned Income Tax Credit

Paid work experience allows participants to gain eligibility for federal and state Earned Income Tax Credits (EITC). For many working parents, receiving this additional amount of money can make a significant difference in the household budget. Agencies must provide information on the EITC to all participants that are co-enrolled in WIA and W-2. See Operations Memo 09-08 for additional information on tax credits.

OTHER PROGRAMS

Wisconsin Shares Child Care

WIA income is disregarded in financial eligibility determination for child care assistance and copayments. Individuals that are co-enrolled in W-2 and WIA under this project are eligible for child care funding regardless of the W-2 placement type. Authorize children for care as needed while the parent is participating in the paid work experience.

FoodShare and BadgerCare Plus

FoodShare: see FoodShare Eligibility Handbook section 4.3.2.1.

BadgerCare Plus: see BadgerCare Plus Eligibility Handbook section 16.2.

CONTACTS

For Policy Related Questions: BWF Regional Office Staff

For CARES Processing Questions: W-2/CC Help Desk

*Program Categories – FS – FoodShare, MA – Medicaid, BC+ – BadgerCare Plus, 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.

DCF/DFES/BWF/RMP