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**State of Wisconsin
Governor Jim Doyle**

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:		09-65						
DATE:		OCTOBER 27, 2009						
FS	<input type="checkbox"/>	MA	<input type="checkbox"/>	BC+	<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	<input type="checkbox"/>	*		
				EP				
PRIORITY:		High						

SUBJECT: Instructions for Moving a Participant to CMF Placement

CROSS REFERENCE: [Operations Memo 02-56, Appropriate Case Management Follow-Up \(CMF\) Services](#)
[W-2 Manual, Section 7.4.1.4.2](#)

EFFECTIVE DATE: November 2, 2009

PURPOSE

This memo provides policy and CARES instructions for moving a participant from a paid placement to CMF when employment begins.

BACKGROUND

[Operations Memo 02-56](#) instructed workers to, “verify with the employer that a participant has actually begun to work and validate the wages and hours prior to placing a participant in CMF”. This policy was originally implemented because frequently workers were changing a placement to CMF by mistake or prematurely, resulting in participants losing out on benefits.

This W-2 policy has been problematic since the implementation of the TANF documentation/ verification requirements in October 2007. TANF Federal rules require that every hour of work participation that is reported in CARES must be documented and verified. If a worker retains a W-2 participant in a paid placement and does not change the assigned activities until after unsubsidized employment has been verified, there may be a period of time where there is no

documentation or verification for the assigned activity because the participant is already working.

In addition, W-2 agency representatives reported at the February 2009 Program and Policy Operations meeting that they have different procedures for changing the placement to CMF, resulting in inconsistency in how and when the final month of benefits are issued to participants who obtain employment.

NEW PROCEDURES

The following policy instructions will address the problems pertaining to documentation and verification of W-2 activities when a participant in a paid placement starts employment while at the same time providing some consistency in how and when the final month of benefits are issued.

The worker must obtain verification that a participant who is placed in a CSJ or W-2 T placement has actually begun to work and validate the wages and hours prior to placing the participant in CMF on WPWW. While waiting for the employment verification, the agency must keep the participant in the paid placement.

1. On the date the participant reports that his or her employment will begin:
 - a. End-date all assigned W-2 activities on WPCS that would conflict with the new employment.
 - b. Discuss with the participant the types of case management services s/he is interested in receiving as part of case management follow-up and assign appropriate new activities.
 - c. Assign either Working Full-time “WF” or Working Part-time “WP” on WPCS using the Scheduled “S” phase of the activity. The Begin Date should be the date the participant reports s/he will start the job. The Anticipated End Date should be a date 7 to 10 days from the date the participant reported the employment in order to allow workers to use CARES online Reports WPRI and WPAI to assist with tracking employment verification due dates.
 - d. Schedule a meeting with the participant to update the Employability Plan to reflect all changes in assignment of W-2 activities if at all possible before the employment begins. If this is not possible, the worker may mail the updated Employability Plan to ensure that the participant has in his/her possession an Employability Plan that aligns with the changes in activities on WPCS.
2. On the date the employment verification is received:
 - a. Post the Working Full-time “WF” or Working Part-time “WP” activity on WPCS using the Actual phase of the activity. The Begin Date should be the date the participant actually started the job. This may require the worker to backdate the Begin Date of the activity. When a worker reports the Actual phase of an activity on WPCS, CARES will automatically post an Actual End Date for the Scheduled phase of that activity.
 - b. Change the W-2 placement to CMF. The CMF start date should be the date all of the needed employment verification is received and should never begin earlier than the first day of employment.

When a request for verification of employment is made by the agency, the participant has seven working days to provide the needed verification. If verification is not received, the worker should follow-up with the participant to determine the status of his/her employment and determine next steps. If the participant reports that employment did not start or has already ended, the worker should immediately schedule the participant for an appointment to update the Employability Plan and re-assign W-2 activities. If the participant fails to provide the verification, the placement may be ended as of the date the employment verification was due and W-2 may be closed. If the participant is making a reasonable effort but is having difficulty obtaining the needed employment verification, the agency must immediately proceed to seek the verification.

CMF CASE MANAGEMENT

CMF case management services continue to be a high priority for the W-2 program. W-2 agencies are responsible for working with and coaching participants to help them learn the skills necessary to retain employment. This responsibility continues for a minimum of 12 months after an individual begins unsubsidized employment. Agencies must provide intense, targeted employment stabilization services aimed at helping participants retain employment and pursue advancement opportunities. At a minimum, post-employment services must include face-to-face case management, assistance in accessing education and training to help the participant advance and help in negotiating difficulties on the job.

USE OF PRORATED CSJS

Although some participants who begin a part-time job are appropriate for placement in CMF, workers are reminded that some participants are more appropriate for placement in a prorated CSJ. If the FEP determines through an informal assessment that a participant has barriers that prevent him or her from obtaining an additional unsubsidized job or from increasing the number of hours in the current job, placement in a prorated CSJ may be appropriate. This includes individuals who lack the skills needed to be competitive for jobs available in the current unsubsidized market. Refer to [W-2 Manual, Section 7.4.1.4.2](#) for additional characteristics of an employed individual who may be appropriate for a prorated CSJ.

Similar to the instructions provided above for changing a placement to CMF, before placing a participant into a prorated CSJ, the worker should first have verification of the employment begin date and verification of the number of hours that will be worked to ensure that appropriate level of activities and W-2 benefits will be provided.

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.

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