

WISCONSIN DEPARTMENT OF HEALTH SERVICES
Division of Health Care Access and Accountability
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To: FoodShare Wisconsin Employment and Training (FSET)
Handbook Users

From: Michele Dickinson, Interim FoodShare Director
Bureau of Enrollment Policy and Systems

Re: **FSET Handbook Release 16-01**

Release Date: 04/12/2016
Effective Date: 04/12/2016

EFFECTIVE DATE The following policy additions or changes are **effective 04/12/2016**, unless otherwise noted. **Grey highlighted text denotes new text. Text with a strike through it in the old policy section denotes deleted text.**

POLICY UPDATES

1.4.1 Job Search ~~Assigning~~ A non-exempt ABAWD can only be assigned to upfront job search and job search training for less than half of their total required hours, ~~without other assigned components is not allowable for FSET,~~ unless these activities are assigned as a component of workfare, see section 1.4.3 of the FSET handbook.

1.4.3 Workfare Required hours of participation are determined by dividing the household's monthly FoodShare allotment by the state or federal minimum wage, whichever is higher. ~~FSET agencies cannot allow participants to volunteer to work beyond that maximum.~~ See section 6.3.2.4 of the FSET handbook for more information on determining required hour of participation for workfare.

~~**Note:** Non-exempt ABAWDs are allowed to voluntarily participate beyond the maximum number of required workfare hours, if they so choose. It is not allowable to require additional hours of participation beyond the maximum requirement calculated as described above.~~

3.5.1 Initial Contact, Appointment Scheduling, and Notification The FSET worker is expected to contact the referred FoodShare member by letter or by telephone within five business days of the FSET referral. As part of the initial contact, the FSET worker will schedule an initial appointment. ~~If the FSET agency reaches the referred member by phone when scheduling the orientation and enrollment appointment, the FSET agency should share with the member an estimate of the duration of the appointment.~~ If the FSET worker attempts, but is unsuccessful in making initial contact via telephone, the FSET worker is responsible for sending an appointment letter within five business days of the FSET referral. The five business days start the day after the FSET referral is received.

The FSET worker is expected to schedule an initial appointment for FSET enrollment and orientation. This appointment should be scheduled to occur within 12 calendar days of the date the FSET referral is received or the effective date of FoodShare eligibility, if the referral is sent prior to the FoodShare eligibility start date. The 12 ~~calendar~~ days ~~time period~~ starts the day after the referral is received.

For referrals in which the effective date of FoodShare eligibility is on or before the date the referral was received:

- The worker is responsible for contacting the member as soon as possible but

- no later than five business days from the date the referral was received.
- If the worker is unable to reach the member within the five business day time frame, an initial enrollment appointment must be scheduled.
- The initial appointment must be scheduled to occur within 12 calendar days of the date the referral was received.

Note: For appointments scheduled to occur within 12 calendar days of the current date, CARES Worker Web (CWW) will automatically send the FSET appointment letter the day after the FSET worker schedules the appointment.

Example 1: On 7/10/15, a referral is received for a non-exempt ABAWD with a FoodShare effective date of 7/1/15. The FSET worker calls the individual member on 7/11/15 and schedules an enrollment appointment for 7/15/15. CWW will automatically send an appointment letter on 7/12/15 for the scheduled appointment on 7/15/2015. The worker contacted the member within the five business day time frame, which expires on 7/17/2015. The worker also scheduled the appointment within the 12 calendar day time frame, which expires on 7/22/2015. The letter is automatically sent on 7/12/15, which is the day after the worker scheduled the appointment on 07/11/2015.

Example 2: On 7/10/15 a referral is received for a non-exempt ABAWD with a FoodShare effective date of 7/1/15. The FSET worker is unable to reach the member by phone on 7/11/15 and 7/15/15. On 7/15/15 the worker schedules the initial enrollment appointment for 7/21/15 so that the member receives the appointment letter prior to the date of the appointment. The worker contacted the member within the five business day time frame, which expires on 7/17/15. The worker also scheduled the appointment within the 12 calendar day time frame, which expires on 7/22/15. The appointment letter will be sent automatically by CWW on 7/16/15.

For referrals in which the 'Effective Date' of FoodShare eligibility is after the date the referral was received:

The worker is responsible for contacting the member no more than five business days from the date the referral was received.

The initial appointment must be scheduled to occur within 12 calendar days after the effective date of FoodShare eligibility.

Note: CWW will automatically send an appointment letter 12 days prior to the appointment.

Example 3: On 7/10/15 a referral is received for a non-exempt ABAWD with a FoodShare effective date of 8/1/15. The FSET worker calls the member on 7/12/15 and schedules an enrollment appointment for 8/2/15 (the member is ineligible for FoodShare in July and so cannot begin participating in FSET until August 1). The worker complied with the five business day requirement, which expires on 7/17/15. The worker also complied with the 12 calendar days, which expires on 8/13/15. CWW will automatically send an appointment letter 12 days prior to the date of the enrollment appointment.

If a member misses their initial appointment, the FSET worker is expected to schedule a second appointment. The second appointment which must be scheduled to occur within 12 calendar days of the initially scheduled missed appointment.

For more information about appointment correspondence, see Process Help 1.8.9.

4.3 Orientation

Orientation should include an overview of all services available through FSET, including services available to help a participant retain employment once he or she gets a job. Participants sometimes stop communicating with their FSET worker after gaining employment, making it difficult for the FSET worker to provide follow-up support and to gather the program information needed to claim an Entered Employment. Emphasizing supportive services available for job retention during the enrollment process may increase the likelihood that participant communication will be maintained after he or she gains employment. If an agency uses a form to collect barrier information during orientation, the FSET agency must inform the FSET participant that the barriers form is optional.

Participant Rights and Responsibilities: Review the FoodShare Employment and Training (FSET) Participation Agreement (F-00136) during the initial FSET enrollment appointment and have the customer sign the document after it has been reviewed. Scan the signed document into the Electronic Case File (ECF), making sure the customer ~~also~~ receives a copy ~~to take with them~~ of the signed agreement.

4.4 Assessment

A comprehensive, individualized participant assessment is used to identify the strengths, needs, and preferences of each FSET participant. Information gathered through the assessment process is the driving force behind the development of an employment plan (EP). Assessment results may also reveal the need for FSET supportive services or for a referral to another service provider to address participant needs that are outside the scope of FSET. FSET agencies must inform FSET participants that all assessment forms will be kept confidential and that the questions about barriers are being asked to connect participants with resources to overcome barriers to employment. It should also be explained that participants can opt out of answering these questions.

Individualized assessments may include, but are not limited to, identifying job readiness, level of job seeking skills, and other potential barriers to employment such as housing, transportation, family, or legal issues. The assessment process includes gathering past and current information from the participant or other relevant sources, either through informal or formal assessment. Assessment is not a one-time process that the FSET worker completes just after FSET enrollment. Instead, assessment and re-assessment are ongoing FSET processes. Once the initial EP is developed, re-assessment of participant progress in employment and training activities is needed to determine if any additional support, changes to the EP, or changes to assigned activities are needed. Follow-up assessment may indicate if current activities or support should be increased, decreased, or eliminated.

Primary areas of assessment include past and present information about the following:

- Barriers Assessment: Collect information regarding barriers to employment in five categories: work participation, housing, transportation, legal issues, and job readiness.
- Education Assessment: Collect and document the participant's educational level, ~~and~~ training information, and relevant test scores. Achievement on educational test scores (e.g. TABE, WRAT, etc.) and certificate/degree completion should be tracked and updated upon reassessment, as necessary.
- Employment Assessment: Collect ~~type(s) of employment~~ information for an individual or document if there is no employment history.

FSET agencies are encouraged to develop their own assessment tools or may use existing assessment tools for conducting a comprehensive, individualized assessment. ~~inclusive of information beyond what is described above,~~ In order to fully support participants' attainment of the knowledge and skills necessary to enhance employment opportunities, assessments should be inclusive of information beyond what is described above.

6.2.1 Non-ABAWD

***An individual may be determined a non-ABAWD if he or she resides in a FoodShare household unit where a household member is under age 18, even if the household member who is under age 18 is ineligible for FoodShare.

6.2.2 Exempt ABAWD

A FoodShare member is an exempt ABAWD if he or she is an ABAWD who meets at least one of the following criteria, as determined by the IM agency:

- Determined unfit for employment, which includes someone who is:
 - Receiving temporary or permanent disability benefits from the government or a private source;
 - ~~Mentally or physically unable to work~~ Unable to work due to physical or mental challenges, as determined by the IM agency;
 - Verified as unable to work by a statement from a health care professional or a social worker (may use Form-01598 Medical Exemption from Work Requirement for ABAWDs to verify).
 - Experiencing chronic homelessness.
 - An individual is chronically homeless if he or she currently lacks a fixed regular nighttime residence and does not expect to have a regular nighttime residence in the next 30 days. This includes people who are in a temporary housing situation.

6.3.2.4 Determining Required Hours of Workfare Participation

FSET participation requirements differ for workfare, in terms of the number of hours needed for a non-exempt ABAWD to meet the work requirement. The number of required workfare hours per month is equivalent to the household's current monthly FS allotment divided by the state or federal minimum wage, whichever is higher. Weekly workfare hours must be established after accounting for hours of participation in other programs, such as a Title IV work program. ~~Non-exempt ABAWDs are allowed to voluntarily participate beyond the maximum number of required workfare hours, if they so choose.~~ It is not allowable to require additional hours of participation beyond the maximum requirement calculated as described above. Changes in the amount of the monthly FS allotment may increase or decrease the number of required monthly hours for workfare. If there is a change in benefit amount, the FSET agency should recalculate the required number of participation hours, and apply that change beginning the month which follows the month the change in allotment becomes known to the FSET agency.

~~Workfare is a household-level program, meaning that all non-exempt ABAWD household members may share the hourly obligation during the course of a month. One member's failure to meet FSET participation requirements does not impact another non-exempt ABAWD household member's eligibility for past or current months, but it may for future months because the other ABAWD(s) would then be required to meet the full workfare monthly hours obligation.~~

Workfare is a household-level program, meaning that all non-exempt ABAWD household members may share the hourly obligation during the course of a month. FSET agencies should document in the FSET participant's PIN comments when the participant lives in a household that includes multiple ABAWDs sharing responsibility for meeting workfare participation requirements. ABAWDs are not required to report changes in household composition to their IM agency, except at the time of FS renewal or Six Month Report Form (SMRF). When a change in household composition is reported, this status change will not result in a referral update being sent to the FSET agency for individuals who remain on the case. An updated referral will be sent when an individual is deleted from a case. When the FSET worker receives a referral update for a workfare participant with a status of "FoodShare Ineligible," they should check the CARES Worker Web (CWW) case to see if there are or were other workfare participants whose hourly participation requirement needs to be updated.

Example 1: Tim and Joe are receiving \$200 in FS benefits per month.

Minimum wage is \$7.25 per hour. The FSET agency divides the monthly allotment of \$200 by the minimum wage of \$7.25, and determines that Tim and Joe must participate in workfare for a combined total of ~~28~~ 27 hours per month. ($\$200 \div \$7.25 = 27.58$ or ~~28~~ 27 hours per month)

Tim and Joe may choose to share the responsibility equally by each participating ~~44~~ a part of the hours per month to meet the participation requirement, or may agree to divide the hours so that one of them participates for more hours than the other. It is allowable for either Tim or Joe to complete all required household hours on his own.

6.3.2.5 Workfare Job Search

Prior to placing an ABAWD in a workfare position, a job search period may be established for up to 30 days. In some cases, participants completing a 30-day job search period will be expected to attend job seeking skills workshops prior to contacting employers. During the job search period, members are considered to be participating in and complying with the requirements of workfare, thereby meeting the participation requirement for ABAWDs. ABAWDs who do not obtain employment after the 30 days will be assigned to a workfare position in the community, as determined appropriate based on the participant assessment.

Example 3: Andre is receiving \$194 in FoodShare benefits per month. He is placed in workfare job search for the initial 30 days. The FSET agency divides the monthly allotment of \$194 by the minimum wage of \$7.25, and determines that Andre must participate in workfare job search for a combined total of 26 hours per month. ($\$194 \div \$7.25 = 26.75$ or 26 hours per month) to meet the work requirement.

6.4 Co-Enrollment in FSET and Another Allowable Work Program

When a non-exempt ABAWD enrolled in another allowable work program is also enrolled in FSET, the FSET worker should work closely with the participant's case worker for the other program in order to accurately determine how many hours he or she participates in the co-enrolled program and how many hours of FSET participation are required monthly in order to meet the ABAWD work requirement. If an ABAWD is meeting the work requirement through participation in another allowable work program, he or she may also be voluntarily referred to FSET as an exempt ABAWD in order to co-enroll.

6.4.1 Participation in a non-qualified Employment and Training Programs

Some FSET participants are participating in other employment or education programs that do not fall under the allowable work program list above. The hours spent in those programs may be able to count as an FSET component (see section 1.4 FSET Component Activities). For example, if a participant is enrolled in another education and training program the hours of participation in this program could be entered on the employment plan and the hours could assist the participant in meeting the ABAWD work requirement if they fall under a definition of an FSET component. The FSET participant participating in other employment or education programs will need to have an employment plan and participant tracked in the FSET tool to continue to receive FoodShare.

Example 1: Charlotte is a newly referred FSET participant and she informs her case manager that she is starting a certified nursing program funded by a local community service organization at the local technical college next week. She will go to class 12 hours per week and has four hours of study time. She spends 16 hours a week on her education. When her FSET case manager enters her activity information for this time period into the FSET Tool she counts the 16 hours under the post-secondary education component. Charlotte is also enrolled in four hours of job search a week. The FSET case manager must record participation information for both the certified nursing program and also the job search.

6.5.4.3 Anticipated to Meet Work Requirement

By the second Saturday of the month, the FSET agency is responsible for recording whether a participant is anticipated to meet the ABAWD work requirement by the end of the current month.

This action should only be taken for **all** non-exempt ABAWDs ~~for all non-exempt ABAWDs~~ who are enrolled, fully participating in FSET, expected to meet the ABAWD work requirement through FSET participation by the end of the current month, and:

1. Are in their third TLB month, or
2. Are in their second or third additional benefit month or an extended benefit month, with no break in FSET participation since the second additional benefit month.

The FSET agency's timely recording of this information tells the CARES system that FoodShare benefits may be issued prospectively for the next month. If the agency does not indicate timely whether it is anticipated that the ABAWD work requirement will be met by the end of the month, an individual's eligibility for FS may end incorrectly, resulting in FSET disenrollment and a lapse in FSET services.

Note: Recording whether a participant is in the third TLB month, third additional month, or any extended benefit month is anticipated to meet the ABAWD work requirement must be completed taken each month ongoing, for the remainder of the individual's FSET participation period. This keeps an individual from inaccurately being determined FS ineligible and allows the CARES system to issue benefits prospectively for the following month by updating the FS clock to 'Active in FSET' status.

Example 2: Susie is a non-exempt ABAWD. In March, her second TLB month, Susie enrolls and is participating in FSET in order to meet the ABAWD work requirement. The FSET worker determines that Susie is anticipated to meet the March ABAWD work requirement by the end of the month. The FSET worker updates the 'Anticipated to Meet Work Requirement?' indicator on the Track Participation and Good Cause page to 'Yes' prior to the second Saturday in March so that Susie can maintain FS eligibility and continue participating in FSET. Now that the policy has been applied, the FSET worker should continue to update this indicator each month based on Susie's current and expected FSET participation.

If the FSET worker enters 'No' to the "Anticipated to Meet Work Requirements?" question and then the FSET participant completes the ABAWD work requirement for that month, the FSET worker must contact the IM agency as soon as they become aware or at least by the 5th of the following month so the IM worker can adjust the members case to reflect this new information.

Example 3: Mary's third TLB month is in December. She enrolled in FSET on December 8 and completed 10 hours that week. This scenario does not meet the requirements to mark the "Anticipated to Meet Work Requirements?" question as 'Yes' so the FSET worker updates this question on the Track Participation page to 'No'; Mary's FoodShare case will close on December 31st. Mary turns in her participation logs on the last day of December and she participated 80 hours in the month of December.

Since Mary met the ABAWD work requirement by the end of the month, Mary's FoodShare clock should be updated to reflect this participation. The FSET agency must contact the IM agency as soon as they become aware the individual met the ABAWD work requirement but no later than the 5th of the following month. The FSET agency must enter the participation information and also add PIN comments. IM agency staff should update the FoodShare clock, issue an auxiliary payment for January, and case comment actions taken on the Mary's case. This process is only necessary for members who are in their third TLB month and the "Anticipated to Meet Work Requirements?" question is answered 'No' and the individual meets the ABAWD work requirement in that month.

7.1.2 Entered Employment

An Entered Employment should be assigned when a job is obtained while participating **and enrolled** in FSET and the job meets all of the below criteria:

- Meets the definition of part-time or full-time employment (see Appendix A),
- Has a start date on or after the FSET **referral enrollment** start date,
- Is gained prior to disenrollment from FSET,
- Is not a job change while employed by a temporary agency, and
- Fits one of the following:

<Table>

Do not assign an Entered Employment to a job that fits any one of the following criteria:

- Any position in which the income cannot be budgeted for the FoodShare benefits (example: work-study),
- An entry into a work experience position or volunteer job, or
- Any ONE of the following:

<Table>

Before the FSET worker records an Entered Employment, the FSET worker must confirm that the employment began, and that Entered Employment conditions have been met in accordance with procedures established by the FSET agency. **The FSET worker must inform the IM agency when the participant gains employment.**

Note: If the position is subsidized or voluntary, do not record as an Entered Employment. Instead, record this position as unpaid work experience or voluntary employment.

10.5 Appendix E: Qualifying Work Programs for ABAWDS

Temporary Assistance to Needy Families (TANF) Work Programs	Work programs must be approved by the state. Example: W-2, Tribal TANF, Children First, Transform Milwaukee Jobs Program, TEMP	20 hours per week Participating and complying with any work requirement under title IV of Social Security Act	U.S. Department of Health and Human Services
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