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

FROM: Janice Peters
W-2 Policy Section
Bureau of Wisconsin Works
Division of Workforce Solutions

DWS OPERATIONS MEMO

No: 06-33

DATE: 07/24/2006

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: **Wisconsin Works (W-2) Sanctions by Race Summary Report**

CROSS REFERENCE: [W-2 Sanctions Study, December 2004](#)
[The Impact of Race on W-2 Sanctions from 2000 to 2004](#)

EFFECTIVE DATE: Immediately

PURPOSE

The purpose of this Operations Memo is to notify W-2 agencies of a new Web Intelligence (WebI) report that provides agencies with data on their use of sanctions (payment reductions.) This new report is intended to assist agencies in monitoring sanctions by race to ensure that the rate and extent by which W-2 sanctions are applied do not differ by the race of the participants.

BACKGROUND

In 2003, the Department of Workforce Development (DWD) began studying W-2 sanctions by race. The studies found differences by race in the amount of sanctions applied to W-2 participants. These findings indicated the need for agencies to monitor the race/ethnicity of participants who were sanctioned in order to assure that racial differences among W-2 participants at the agency level do not contribute to the application of W-2 sanctions.

MONITORING REPORT

The Department of Workforce Development (DWD) has created a new Web Intelligence (WebI) report for agencies to use to monitor and track sanctions by race. The report identifies the number and percent of W-2 participants in the W-2 T and CSJ placements that are sanctioned during a W-2 participation period (16th of a calendar month through the 15th of the following month.)

The sanction by race summary report includes only those W-2 participants who were in a CSJ or W-2 T placement during the participation period. W-2 participants are grouped into categories based on how W-2 participants' race and ethnicity are reported in CARES. The groups are Asian, African American, Hispanic, White, Other Race, and More Than One Race. Within each of these categories, the report shows the following:

- The number of CSJ and W-2 T placements,
- The number of CSJ and W-2 T participants with a sanction during a participation period,
- Each race/ethnic category, as a percent of CSJ and W-2 T placements, and
- Each race/ethnic category sanctioned as a percent of all sanctions.

WHERE TO FIND THE REPORT

The **DTPP Sanctions Summary** is available in the **Monitoring Reports W-2 & FSET** folder within Corporate Documents.

W-2 Participants in W-2 T or CSJ and Sanctions By Race or Ethnic Group Summary report:

Business Objects interface showing the report 'DTPP Sanctions Summary'. The report title is 'W-2 Participants in W-2T or CSJ and Sanctions By Race or Ethnic Group'. Drill filters are set to '105. May 2006' and 'Wisconsin'. The summary table is as follows:

	Asians	Blacks	Hispanics	Whites	Other Race	More Than One Race	All Participants in W-2T or CSJ
Total:	258	3,995	643	1,235	120	27	6,278
# with Sanctions	9	1,077	146	184	25	10	1,451
% of Cases	4.1%	63.6%	10.2%	19.7%	1.9%	0.4%	
% of All Sanctions	0.6%	74.2%	10.1%	12.7%	1.7%	0.7%	

W-2 Participants in W-2 T or CSJ and Sanctions by Race or Ethnic Group listing report:

W-2 Participants in W-2T or CSJ and Sanctions By Race or Ethnic Group																		
105. May 2006 Waukesha Region XKE018																		
Name	PIN	Case Number	Placement Code	Asians with Sanctions	Asians	Blacks with Sanctions	Blacks	Hispanics with Sanctions	Hispanics	White with Sanctions	Whites	Other Race with Sanctions	Other Race	More Than One Race with Sanctions	More Than One Race	Total Participants with Sanctions	Total Participants in W-2T or CSJ	
			D1. W2T	0	0	0	1	0	0	0	0	0	0	0	0	0	0	1
			D1. W2T	0	0	0	1	0	0	0	0	0	0	0	0	0	0	1
			D1. W2T	0	0	0	0	0	0	0	1	0	0	0	0	0	0	1
			D1. W2T	0	0	1	1	0	0	0	0	0	0	0	0	0	1	1
			D1. W2T	0	0	0	0	0	0	0	1	0	0	0	0	0	0	1
			D1. W2T	0	0	0	0	0	0	0	0	0	1	0	0	0	0	1
			D1. W2T	0	0	0	0	0	0	0	1	0	0	0	0	0	0	1
			D1. W2T	0	0	0	0	0	0	0	1	0	0	0	0	0	0	1
			D1. W2T	0	0	0	0	0	0	0	1	0	0	0	0	0	0	1
			D1. W2T	0	0	0	0	0	0	0	1	0	0	0	0	0	0	1
			Count:	9		9												
			Sum:	0	0	1	3	0	0	0	5	0	1	0	0	0	0	9

HOW TO USE THE SANCTIONS BY RACE REPORT

The last column of the sanctions summary page gives the total number of CSJs and W-2 Ts recorded during the participation period and the total number of sanctions applied.

By comparing the two percentage rows at the bottom of the summary tab, the user of the report will be able to determine whether a particular race/ethnic category of participants is being sanctioned at a rate that is greater than that group's participation in CSJ or W-2 T placements.

Please note that the number of CSJs and W-2 Ts will not match the monthly caseload counts of W-2 participants in these two placement types because of different timeframes. The monthly W-2 caseload is based on participants who were served during a calendar month (DTM), while the sanctions report is based on the W-2 participation period from the 16th of a month through the 15th of the report month. For example, the June sanctions report will identify those cases with sanctions that were open during the participation period of May 16th through June 15th. The June W-2 caseload includes those W-2 participants who were in a W-2 placement for at least one day during the calendar month of June.

REQUIRED ACTION

W-2 agencies should review the sanctions summary report on a monthly basis for any indication of disproportionate sanctions by race or ethnicity. Division of Workforce Solutions Regional Office staff will also review the summary report. Agencies must do the following:

1. Review the report monthly, compare the percentage of sanctions by race to the caseload composition. If the agency or the DWS Regional Office staff determines that the report indicates the possibility of disproportionate sanctions by race, the agency is to conduct a more detailed case review. The case review should include the following:
 - a review of the appropriateness of the W-2 placement;
 - the criteria used in the application of the sanction;
 - the details of the good cause criteria determination (Operations Memo 06-28);
 - and

- case management efforts and plans to assist the participant, for example if the sanction results in significant payment reductions, what steps is the agency taking to minimize the impact on the participant's time limited payments.
2. If an agency's monthly monitoring shows disproportionate sanctions by race or ethnicity, the agency will be required to submit the results of the detailed case review to the DWS Regional Office by the 15th day of the following month. In addition, the agency will be required to share its plan for resolving this sanction trend with the DWD Regional Office.
 3. A persistent occurrence, three months or more, of disproportionate sanctions by race or ethnicity will trigger a "Required Action" letter from the DWD Regional Office. Agencies that receive this letter must work with the DWS Regional Office to implement the steps and process outlined in the "Required Action" letter.

CONTACTS

For Policy Related Questions: BW-2 Regional Office

For CARES Processing Questions: BEM CARES Information & Problem Resolution

★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/BW-2/AE