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TO: **Economic Support Supervisors
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Income Maintenance Staff
W-2 Agencies
Training Staff
Child Care Coordinators**

FROM: Janice Peters, Bureau Director
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Division of Workforce Solutions

BEM/DWS OPERATIONS MEMO					
No:	06-51				
DATE:	12/19/2006				
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"/>				
PRIORITY: HIGH					

SUBJECT: **UPDATING THE FEDERAL 60-MONTH CLOCK WHEN ISSUING WISCONSIN
WORKS (W-2) AUXILIARY PAYMENTS**

CROSS REFERENCE: Operations Memos 99-21, 05-25, 05-27, 05-32, and 05-45
W-2 Manual 2.3.6 and 2.3.6.2

EFFECTIVE DATE: Immediately

PURPOSE

This memo provides Wisconsin Works (W-2) agencies with instructions to update the federal clock when a W-2 auxiliary payment is issued for a month in which CARES did not automatically update this clock. In addition, this memo provides instructions to agencies to review all cases approaching the 18th and the 54th month to verify that for each auxiliary payment that has been issued in the case there is a corresponding clock tick.

BACKGROUND

A recent Legislative Audit Bureau (LAB) review found that in some cases, the federal 60-month clock was not updated for months for which auxiliary payments were issued. Because the federal clock was not updated, some participants may have received cash assistance beyond the federal 60-month time limit during a period for which no time limit extension was in place.

In response to the LAB findings, DWD agreed to the following action items:

- 1) Update W-2 policy to require a review of federal clocks when a retroactive auxiliary payment is issued.
- 2) Review all cases approaching 60 months to determine if months for which cash payments were issued were correctly counted against the federal 60-month time limit.
- 3) Review all W-2 cases for which extensions to the 60-month time limit were denied to ensure those cases were not provided assistance payments in excess of the 60-month federal limit and recoup assistance paid for cases that did not have an extension.

NEW POLICY

Reviewing Federal Time Limits When Issuing Auxiliary Payments

When an auxiliary payment is issued the FEP must determine if the federal clock must be updated. If the auxiliary payment is for a prior month, the FEP must review CARES screen AIWC to determine if CARES generated a tick. If CARES has not generated a tick, then the FEP must manually update the federal clock.

Exception

The federal clock does not tick for documented aliens, participants in Trial Job placements, and for **some** individuals in CMC placements. Please refer to Operations Memo 99-21 for guidance on CMC placements and general information for when clocks will automatically tick. Do not manually update the federal clock (OTF) for any of these W-2 participants or for those not in cash assistance placements.

If the auxiliary payment is for the current month, the FEP should send him/herself an alert or another form of reminder to review CARES screen AIWC at the beginning of the following month to determine whether CARES generated a tick during the CARES batch job, which runs on the last business day of each month. The instructions for reviewing and updating the federal clock are included below in the *CARES Processing* section.

On CARES screen AIWC, the federal 60-month clock is tracked in the FED USED field. The 60 MO field located above the FED USED field tracks Wisconsin's 60-month clock. Wisconsin's 60-month time limit is tracked by months of placement in an employment position, and for some CMCs; the federal clock is tracked by months that cash assistance is paid. These clocks are not tracking the same information.

AIWC	WISCONSIN WORKS (W2) CLOCKS										10/10/06 12:43							
CASE: 0700403507	WORKER: XCT548										XCTI35 R PROCHAZKA							
LAST UPDATED: 09 29 06	CASE STATUS: OPEN										CASE MODE: ONGOING							
PIN: 0100830137			NAME: BOB			INCREDIBLE												
60 MO:	MX	UD	RM	UD	JOBS:	0	TJB:	24	0	24	CSJ:	24	2	21	W2T:	24	0	24
FED USED: 3 MO			OPC:	0	CMC:	0	OTF:	1										
ELIG	CLOCK	FED	OVR	AGY	AGY	DEC	STATE	EXT	EXT	BEG	EXT	END	USER	ID	UPDATED			
MTH	TYPE	IND	RSN	DEC	DT	DEC	DEL	MTH	MTH				DT					
0906	OTF_	Y	___											XCTI35	09 29 06			
0806	CSJ_	Y	___											CARES	08 31 06			
0706	CSJ_	Y	___											CARES	07 31 06			
PFKEYS: 13=AIWO, 14=AIWE, 18/ENTER=NEXT INDIVIDUAL													PAGE 1 OF 1					
NEXT TRAN: _____													PARMS: 0700403507_____					

To determine whether CARES generated a federal tick during the CARES batch job enter AIWC in the Tran field and the case number in the Parms field. Look at the ELIG MTH and the CLOCK TYPE columns on the left side of the screen to determine whether the month for which an auxiliary payment has been issued is reflected.

If the month for which the auxiliary payment was issued is not displayed in the ELIG MTH column on AIWC, then the federal clock must be ticked on AIWO for that month. If the FED IND is N, then this case meets the exception criteria identified in the text box above. Do not manually update the federal clock for these exceptions as listed above in the text box.

CARES Processing

1. On AIWO, complete the BENEFIT MMY field with the corresponding month that must be updated. **This will be the month for which the auxiliary was issued, not necessarily the month the auxiliary payment was generated.** (Example: An auxiliary payment was generated on 12-2-06 for the participation period of 9-16-06 through 10-15-06. The month for which the check was issued was October, but the month the check was generated was December. In this example, the month the clock must be ticked for is October because that is the month for which the payment was issued.)
2. Enter CLOCK TYPE as OTF (Other TANF).
3. Enter the override reason: OVR RSN as ASE, PRD or other appropriate reason code as listed on Reference Table TTLO.
4. Enter a comment on the comment line (which is required by CARES).
5. Press enter and the ADD SUCCESSFUL message should display.
6. Repeat steps 1 – 5 for each additional month that a manual tick must be entered for the case.

NOTE ➤ For two parent cases, an OTF tick must be entered for both the parent in a W-2 placement and the second parent.

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AIWO                CREATE W2 CLOCKS                10/10/06 13:08
CASE: 0700403507   WORKER: XCT548                XCTI35 R PROCHAZKA
LAST UPDATED:                                           CASE STATUS: OPEN
CASE MODE: ONGOING

NUM: ___  NAME:                SSN:

BENEFIT MMY: 0906_  CLOCK TYPE: OTF_  OVR RSN: PRD  OVR USER ID: XCTI35

COMMENT:
Auxiliary payment resulting from Fact Finding

PFKEYS: 13=AIWC
-----INDIVIDUALS-----
 02 BOB   I (PP )   01 HELEN I (WIF)   03 VIOLE I (NOT)   04 DASH I (NOT)
NEXT TRAN: _____  PARS: 0700403507_____

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Example

If the results of a Fact Finding overturn the agency's decision to impose a full payment reduction for the participation period of 8-16 to 9-15, the eligibility month is September and the month for which a manual clock update must be done is September. The month in which an auxiliary payment is requested is not necessarily the eligibility month for which the auxiliary check is paid. The eligibility month is always equal to the month in which the participation period ends. In this example, the participation period ended on 9-15, so the eligibility month is September.

Operations Memo 05-27 requires agencies to designate auxiliary payment approvers. The designated auxiliary payment approver or other appropriate supervisory staff is now required to conduct a second party review of the AIWC screen prior to approving an auxiliary payment in order to ensure that the federal 60-month clock is updated appropriately.

Reviewing Cases Approaching Time Limits for Past Auxiliary Payments

No later than the 18th or 54th month and prior to the extension discussion, FEPs must now review CARES screens AIWC, IQAF, IQAD, and IQAM to determine if there have been auxiliary payments issued for months without a federal clock tick. When the FEP determines that there have been payments issued that do not have a corresponding clock tick, the FEP must manually update the federal OTF clock for the appropriate eligibility month(s).

There may be some cases reaching the 60th month earlier than anticipated and some cases may have exceeded the 60-month limit. If the case has exceeded the 60-month limit, the agency must determine if an extension is appropriate or if benefit recovery action is necessary. However, keep in mind that Operations Memo 05-45 limits recoupment of overpayments resulting from administrative error to 12 months from the date of discovery which is the same as the overpayment claim notice date. In other words, the overpayment period cannot begin more than 12 months prior to the notification date of the overpayment.

DWD is reviewing cases for which extensions to the 60-month time limit were denied to ensure those cases were not inadvertently provided cash assistance beyond the 60-month time limit. In situations where there were payments issued beyond the 60-month federal time limit, the cash assistance must be recouped as allowed in Operations Memo 05-45. However, no

agency action on these cases is required at this time. A subsequent Operations Memo will be issued to address these cases if necessary.

CARES Review

Use Benefit Issuance screens IQAM, IQAF and/or IQAD to identify past auxiliary payments. IQAM will provide the most detailed payment information when dates are entered into the PARMS.

To query IQAM, enter <IQAM> in the NEXT TRAN and <Case Number / MMCCYY / MMCCYY> in the PARMS. To query all payments made from January, 2001 to December, 2006, it will be entered like this:

NEXT TRAN: IQAM PARMS: 3700210132/012001/122006

This will bring up all of the payment history on a case for the time period entered in the PARMS. IQAM will display each payment issued during the requested time period, and identify each payment as IN (Initial), MN (Monthly) or SU (Auxiliary). The payments coded SU will be the auxiliary payments that need to be researched.

See the screen print for IQAM, below.

IQAM AFDC/W-2 ISSUANCE HISTORY - PAYMENT PERIOD											12/05/06 14:37	
											XCT545 M WELCH	
CASE		BEG PERIOD		END PERIOD								
6700309867		01 2001		12 2006								
CURRENT PRIMARY PSN NAME		SEARS, ANNETTE										
SEL	CAT	SEQ	BEN NUMBER	BEN PERIOD	BEN RSN	BEN TYP	BEN AMT	RECOUP/ OFFSET	DOCKING/ DR FELON	RTN AMT/ LFARE FN	VENDOR AMT	
_	WW	C	1 100050690	11 01 03		MN	673.00	.00	.00	.00	.00	
_	WW	C	1 100050402	10 01 03		MN	673.00	.00	.00	.00	.00	
_	WW	C	1 100050123	09 01 03		MN	673.00	.00	.00	.00	.00	
X	WW	C	1 100055208	08 01 03	908	SU	70.00	.00	.00	.00	.00	
_	WW	C	1 100049858	08 01 03		IN	260.00	.00	.00	.00	.00	
TOTALS FOR THE PERIOD							17534.00	.00	.00	.00	.00	
PF14 IQAV		PF15 IQAF		PF16 IQAP		PF17 IQAD		PF18 IQWD				
NEXT TRAN: _____		PARMS: 6700309867/012001/122006_____										

To view the detailed information on a specific auxiliary payment, enter an X in the SEL field next to the identified auxiliary payment on IQAM and press PF17 to go to IQAD.

IQAD will display payment details, including each monthly amount if the auxiliary payment was for multiple months.

IQAD AFDC/W-2 ISSUANCE HISTORY - DETAILS							12/05/06	14:46
							XCT545 M WELCH	
CASE NUM	CAT	SEQ	BENEFIT NUM	TOTAL VENDOR AMT				
6700309867	WW C	01	100055208	.00				
PAYEE TYPE:	PR			ADDRESS IND:				
PAYEE NAME:	SEARS, ANNETTE			AFFIDAVIT RCV DT:				
BANK NAME:				REPL CHK NUM:				
ADDRESS:	852 ELM ST			REPL CHK DATE:				
	MILWAUKEE WI 53201			CHK/EFT DATE: 03 01 05				
				RUN TYPE IND: D				
SEL	BEN TYPE	BEN RSN	PERIOD COVERED	BENEFIT AMT	RECOUP AMT	OFFSET AMT	RETURNED AMT	
_	SU	908	08 01 03	70.00	.00	.00	.00	
PF14 IQAV							PF15 IQAF	PF16 IQAP
NEXT TRAN: _____							PARMS: 6700309867/WW C/01/100055208_____	
							PF17 IQAM	PF18 IQWD

Tran to AIWC and PF8 through the screens to see if clock ticks were entered for the month(s) the auxiliary payment was issued.

If the month and year for which the auxiliary payment was issued is listed on AIWC and is displayed in the ELIG MO column, take no action. If the month and year for which the auxiliary payment was issued is not reflected on AIWC, enter a clock tick on screen AIWO to update the OTF clock for the appropriate eligibility month.

NEXT STEPS

DWD will identify those cases that received an auxiliary payment and were denied an extension to ensure that those cases were not provided assistance beyond the 60-month federal limit and will do as much as possible internally to update the federal 60-month clocks for these cases. No agency action to identify these cases or to update clocks on these cases is required at this time. However, DWD is reviewing cases and if necessary will provide additional guidance to W-2 agencies in the coming months.

Policy questions: Please direct policy questions to your Regional Office

BEM CARES Information & Problem Resolution Center

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.