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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 Wisconsin Works
Division of Family Supports

DFS OPERATIONS MEMO			
No:	07-38	(Corrected)	
DATE:	07/16/2007		
FS	<input type="checkbox"/>	MA	<input type="checkbox"/>
CTS	<input type="checkbox"/>	CC	<input type="checkbox"/>
FSET	<input type="checkbox"/>	EA	<input type="checkbox"/>
JAL	<input type="checkbox"/>	JC	<input type="checkbox"/>
WIA	<input type="checkbox"/>	Other	<input type="checkbox"/>
SC	<input type="checkbox"/>	W-2	<input checked="" type="checkbox"/>
CF	<input type="checkbox"/>	RAP	<input type="checkbox"/>
EP	<input type="checkbox"/>	*	<input type="checkbox"/>
PRIORITY: HIGH			

SUBJECT: **Best Practices For Wisconsin Works (W-2) Participation**

CROSS REFERENCE:

W-2 Manual Sections (referenced in the order found in this Operations Memo):

[8.3.2.2 Aggregating Education and Training Hours](#)

[8.3.2.2.1 Combining Aggregated Education and Training with Prorated CSJ Policy](#)

[8.3.2.1 Education for 18 and 19-year-old CSJ Participants](#)

[7.4.1.7 CSJ Education and Training](#)

[7.4.2.5 W-2 T Education and Training](#)

[7.4.2.1 General W-2 T Participant Description Characteristics](#)

EFFECTIVE DATE: Immediately

PURPOSE

This memo:

1. Describes, at a high-level, the Federal Temporary Assistance for Needy Families (TANF) Work Participation Requirements for CSJ and W-2 T participants.
2. Provides a number of best practice strategies to effectively prepare individuals for employment while ensuring that participants are engaged in work and training activities to the fullest extent possible.

3. Reiterates W-2 policy for assigning work training activities and education and training activities to CSJ and W-2 T participants; and
4. Provides further guidance on the use of the CARES activities (also called components), Caring for Disabled Child (CD) and Caring for Other Family Member (CF).

BACKGROUND

The Federal TANF legislation was reauthorized as part of the Deficit Reduction Act of 2005 (DRA). The legislation did not change the TANF work participation rates or the 12 Federal categories of work activities. However, it did direct the U.S. Department of Health and Human Services to develop new regulations that define each of the 12 Federal work activities and to require states to establish and maintain work participation verification procedures. The provision for the Caseload Reduction Credit was also amended to adjust the base year from 1995 to 2005 resulting in a lower work participation rate caseload reduction credit in Wisconsin beginning in Federal Fiscal Year 2007.

As a result of these new Federal provisions, the Department has been placing more focus on Federal TANF work participation requirements, including: 1) Completing a thorough analysis of Wisconsin's TANF work participation rates; 2) Developing reports for the Department and the agencies to use in monitoring work participation; and 3) consulting with stakeholders to develop strategies that will position Wisconsin to meet the TANF work participation requirements while continuing to emphasize W-2's primary goal of providing individualized services which move individuals to work.

At this time, no dramatic shifts in W-2 policy or program philosophy are planned. W-2 activities are to serve the purpose of helping individuals overcome employment barriers and develop the skills needed to become gainfully employed. W-2 agencies must, however, consider where quality improvement measures should be taken to ensure that participants are engaged in work and training activities to the fullest extent possible. This memo will describe best practice strategies to assist agencies with this undertaking.

FEDERAL WORK PARTICIPATION REQUIREMENTS

1. In general, in order for a CSJ or W-2 T participant to meet the TANF work participation requirement, s/he must participate in a minimum of 20 hours of Core activities per week. These 20 hours do not include hours in which a participant was sanctioned for non-participation. While W-2 good cause policy does not limit the number of hours a participant may receive good cause for non-participation, there are limits on the number of good cause hours that may be counted towards the TANF work participation requirement. The Department will keep track of reportable hours through its federal reporting data system.

Core activities, as defined in TANF regulations, that count toward meeting the 20-hour requirement may include participation in any of the following:

- A. Working Full-Time (WF) or Working Part-Time (WP);
- B. Work Experience (WE);
- C. Job Skills Training (JS) by itself or combined with Vocational Adult Basic Education (VA), Vocational English-as-a-Second-Language (VE), or Vocational Literacy (VL). This activity may count as a Core activity for no more than 12 months during the lifetime of participation. The 12 months need not be consecutive;

- D. Technical College (TC). This activity may count as a Core activity for no more than 12 months during the lifetime of participation. The 12 months need not be consecutive;
- E. Activities that fall under the Federal definition of Job Search and Job Readiness. These activities may count toward the 20 hour per week requirement for no more than 12 weeks in a federal fiscal year (October 1 - September 30) and no more than 4 consecutive weeks. These activities include:
- Disability and Learning Assessment (AD)
 - AODA Counseling (CA)
 - Career Planning & Counseling/Up-Front Career Planning (CE, UC)
 - Occupational Testing (OC)
 - Mental Health Counseling (CM)
 - Employment Search/Up-front Employment Search (ES, UE)
 - Job Readiness/Motivation (MO)
 - Mental Health Assessment (AM)
 - AODA Assessment (AA)
 - Physical Rehabilitation (PR)
 - Life Skills (LF)
 - Physicians Assessment (AL)
 - Career Advancement Services (CR)
 - Job Retention Services (JR)
 - Mentor/Coach (MN);
- F. Assignment to a combination of any of the activities listed in A through E above.
2. In addition to 20 hours per week of Core activities, CSJ and W-2 T participants whose youngest child is age 6 or older must also participate in 10 or more hours of additional activities. These activities may be additional hours of Core activities or they may be Non-Core activities, as defined in TANF Regulations. Non-Core activities may include:
- A. Adult Basic Education (BE)
 - B. English-as-a-Second Language (EL)
 - C. Literacy Skills ((LS)
3. Teen parents, ages 18 and 19, who do not have a high school diploma, may meet their work participation requirement either through the combination of Core and Non-Core activities described above, or through participation in activities that fall under the federal definition of Satisfactory School Attendance. These activities include:
- A. General Educational Development – GED (GE)
 - B. High School Equivalency Diploma – HSE (HE)
 - C. Regular School – K through 12 (RS)
- Note that for Satisfactory School Attendance, the TANF regulations do not require a specific assignment of hours. The participant must, however, demonstrate that, through the assignment of the activity, they are making progress towards completion of their diploma.
4. CSJ and W-2 T participants who are caring for a disabled family member are excluded from the TANF work participation requirement. In order to be excluded, the participant must be assigned to one of two CARES activities, Caring for Disabled Child (CD) or Caring for Other Family Member (CF).

BEST PRACTICE STRATEGIES

The following are best practice strategies that were developed with the input of various stakeholders that will help position Wisconsin to meet the TANF work participation rates while continuing to emphasize W-2's primary goal of moving individuals to work.

WORK EXPERIENCE

When assigning Work Experience as the primary work training activity, assign 25 hours per week. This ensures that even with a small amount of non-participation, the participant is still able to meet the 20 hour Core work participation requirement.

JOB SKILLS TRAINING

When assigning Job Skills Training as the primary work training activity (or in combination with Vocational ABE, ESL or Literacy), assign as close to 25 hours per week as possible. This ensures that even with a small amount of non-participation, the participant is still able to meet the 20 hour Core work participation requirement.

Job Skills Training is a highly effective method for moving individuals into jobs when the training is designed for the local labor market, with an emphasis on high growth, high demand occupations.

Methods that W-2 agencies may use to provide participants with access to training include:

1. Designing a training program in response to an employer-request to hire a specific number of trained individuals.
2. Designing training programs for jobs currently in high-demand in the local labor market.
3. Matching individual participants with training slots available in existing high-quality training programs.
4. Working with training providers such as Technical Colleges and Workforce Development Boards to customize an existing training program for groups of W-2 participants.
5. Linkage to high demand Pre-Apprentice and Apprentice programs.

As a reminder, the FEP may aggregate education and training hours to allow W-2 T and CSJ participants' access to short-term intensive job skills training programs that require more than 10 or 12 hours of participation per week. The aggregation policy can be applied for education and training programs that a participant can complete within a one-year period with participation in up to 516 hours of education and training activity. Refer to Section 8.3.2.2 of the W-2 Manual for more information on W-2 Aggregated Education and Training policy.

COMBINING CORE AND NON-CORE ACTIVITIES

The expectation in the TANF Regulations that participants engage in a combination of Core and Non-Core activities closely mirrors W-2 policy for CSJ and W-2 T participants. Most individuals will do best when engaged in a combination of work training and education and training activities. There are a number of ways to combine activities that will serve the purposes of helping individuals move towards employment while also engaging in a combination of activities that will meet the TANF work participation requirement. The combination of activities that are assigned should be tailored to the skills, interests and needs of the participants. *Note: The numbers below would need to be adjusted slightly for W-2 T participants.*

The following are examples for combining activities:

1. Work Experience: 25 hours + Job Search and Job Readiness Activities: 5 hours + Basic Education (i.e., ABE, ESL or Literacy) or GED: 5 to 10 hours = 35 to 40 hours of participation.

2. Job Skills Training: 25 hours + Job Search and Job Readiness activities: 10 hours = 35 hours

Note: Study time that is required for job skills training should also be counted as assigned hours. Study time must be supervised and tracked for attendance purposes.

3. Job Skills Training: 15 hours + Work Experience: 10 hours + Job Search and Job Readiness Activities: 10 hours = 35 hours
4. For CSJ and W-2 T participants, who are working part-time, combine unsubsidized employment hours with other core activities to bring them up to a minimum of 25 hours per week. Core activities may include work experience, job skills training and job search and job readiness activities. Assign additional activities, such as basic education, as appropriate.

Example 1:

Sarah works 15 hours per week in unsubsidized employment. She is placed in a 1/2 Prorated CSJ because she lacks the skills needed to allow her to be competitive for a full-time job in the unsubsidized labor market. In addition to working part-time, her W-2 worker assigns her to 20 hours per week of job skills training and 5 hours of job search and job readiness activities. Her combined total hours of participation per week are 40 hours of Core activities.

Note: The worker based assignment of activities on policy found in the W-2 Manual under Section 8.3.2.2.1, Combining Aggregated Education and Training with Prorated CSJ Policy.

Example 2:

Susie has significant work history but a recent car accident left her with a permanent brain injury. She works 8 hours per week in unsubsidized employment but is unable to increase her hours due to her injury. A vocational evaluation shows that through vocational retraining and special accommodations, Susie could eventually go back to work full-time. In addition to the 8 hour of unsubsidized employment, her W-2 worker assigns her to 20 hours per week of job skills training and 5 hours per week of job search and job readiness activities. Her combined total hours of participation per week are 33 hours of Core activities.

STRATEGIES FOR PROMOTING FULL PARTICIPATION

Some participants have barriers to full participation or lack the motivation to fully engage in the activities assigned to them. W-2 agencies should consider strategies that will address problems with non-participation. Examples include:

1. Tailor work experience sites and job skills training to the interests, skills and employment goals of each participant. Participants who are engaged in work activities that are meaningful to them are more likely to remain fully engaged in the activity and less likely to accrue non-participation.
2. Identify work sites that are flexible in meeting the needs of the participants. Examples: 1) Worksites that allow a participant to make up hours of non-participation on an alternative day; 2) Worksites that allow a participant to leave for part of a workday to attend to family issues and return to complete his/her participation later in the day.
3. Schedule activities in a way that minimizes amount of daily travel and limits the number of daily activities to make participation as simple as possible. For example, individuals who

are assigned to a combination of work experience, employment search and adult basic education could be assigned to the following schedule:

Monday: Work Experience: 6 Hours + Adult Basic Education: 2 Hours

Tuesday: Work Experience: 6 Hours

Wednesday: Employment Search: 5 Hours + Adult Basic Education: 2 Hours

Thursday: Work Experience: 7 Hours

Friday: Work Experience: 6 Hours

Note: The numbers would need to be adjusted slightly for W-2 T participants.

4. Provide nominal incentives to promote participation such as small gift certificates, food vouchers or small gifts. Daily/weekly drawings for door-prizes at group activities or individualized reward systems may produce effective results with little cost to the agency.

JOB SEARCH AND JOB READINESS STRATEGIES

CSJ and W-2 T participants who are appropriate for job search should continue to be assigned job search and job readiness activities on an ongoing basis in conjunction with other work training activities. However, case managers should also consider assigning periods of intensive job search at intervals throughout a participant's time in the W-2 program.

An applicant who meets the general characteristics of a CSJ placement should typically be assigned to a period of up-front job search before being placed in a CSJ. If the applicant is unable to secure unsubsidized employment and a CSJ placement is made, the individual should be assigned to a combination of activities similar to those laid out in the examples described earlier in this memo under *Combining Core and Non-Core Activities*. The goal of assigning work training activities in a CSJ placement is to help individuals develop good work habits and learn skills that will assist them in obtaining employment. After a set period of time in a CSJ placement, if the participant has demonstrated progress in developing needed employment skills, the case manager may choose to revise the participant's employability plan and focus exclusively on job search activities, e.g., job club, facilitated job search, individual job search. If this strategy is used, the W-2 agency must ensure that they are providing a significant amount of hands-on assistance. This must include using the participant's career and educational assessment information to solicit job openings, market the participant to employers and arrange for job interviews.

If this strategy is used, the interval of intensive job search should be limited to no more than 4 weeks, at which time the employability plan should be reviewed to determine the appropriate next steps.

ACTIVITIES FOR 18 AND 19 YEAR OLDS

As noted earlier in this memo, there are special provisions in the TANF regulations for 18 and 19 years who have not completed high school. Teen parents, ages 18 and 19, may meet their work participation requirement either through the combination of Core and Non-Core activities or through participation in activities that fall under the federal definition of Satisfactory School Attendance. These activities include General Educational Development, High School Equivalency Diploma and Regular School.

This closely mirrors W-2 policy, Section 8.3.2.1, which states that:

When an 18- or 19-year old CSJ participant has not obtained a high school diploma or equivalent, the W-2 agency must allow the participant to decide whether to attend high school or to enroll in a course of study meeting the

standards established under 115.29(4), Wis. Stats, in order to satisfy, in whole or in part, the required hours of participation in a CSJ. The W-2 agency must monitor each participant's progress towards achieving a high school diploma or equivalent.

W-2 case managers must be sure to carefully explain to 18 and 19 year olds the option to meet their W-2 participation requirement through activities that prepare them for a GED, HSED or through attendance at a High School program. Appropriate coding of these activities in CARES are General Educational Development (GE), High School Equivalency Diploma (HE) or Regular School (RS). If an 18 or 19 year old is attending Adult Basic Education activities with a goal of obtaining a GED or HSED, the activity assigned in CARES should be either GED (GE) or HSED (HS).

Strategies for W-2 T Participants

Individuals are placed in W-2 T for a variety of reasons and as such, the strategies for engaging them are diverse and should be tailored to the needs of the participant. Agencies should review their W-2 T caseload and prioritize based on characteristics of the family.

W-2 cases that should be a higher priority for increasing participation include participants with longer term barriers or medical needs who are unlikely to qualify for Supplemental Security Income (SSI). This may include individuals with employment barriers related to mental health, substance abuse, cognitive functioning or physical limitations and individuals who are victims of domestic violence.

Strategies to address the special needs of these individuals include:

1. Implementing motivational techniques that begin in the W-2 application phase. For example, through the assessment process and completion of the Barrier Screening Tool, individuals must be given the opportunity to provide information about medical conditions and other employment barriers. However, rather than explaining formal assessment and the Medical Capacity Form as a means to determine how many hours a participant is able to work, the case worker should place emphasis on using formal assessments to determine what accommodations can be implemented and what supportive services should be put in place to help the participant engage in employment and training activities.

Work is also being done through the Department-led W-2 Screening and Assessment Advisory group to review and edit the Medical Capacity Form as well as W-2 assessment policies to ensure that policy and medical forms clearly communicate the employment focus of W-2.

2. Using vocational evaluations to help participants with disabilities identify and explore their unique career interests, aptitudes and skills, and formulate immediate and long-term career goals.
3. Coordinating with the Division of Vocational Rehabilitation (DVR) to ensure that persons with disabilities are able to access DVR services. Work-related activities and job skills training provided through DVR may also count towards participation in the W-2 program.
4. Developing or sub-contracting with Supported Employment work sites. The U.S. Department of Labor's website characterizes Supported Employment in the following way:

Supported employment facilitates competitive work in integrated work settings for individuals with the most severe disabilities (i.e. psychiatric, mental retardation, learning disabilities, traumatic brain injury) for whom competitive employment has not traditionally occurred, and who, because of the nature and severity of their

disability, need ongoing support services in order to perform their job. Supported employment provides assistance such as job coaches, transportation, assistive technology, specialized job training, and individually tailored supervision.

Supported employment is a way to move people from dependence on a service delivery system to independence via competitive employment. Recent studies indicate that the provision of on-going support services for people with severe disabilities significantly increases their rates for employment retention. Supported employment encourages people to work within their communities and encourages work, social interaction, and integration.

For more information about Supported Employment, go to:

<http://www.dol.gov/odep/archives/fact/supportd.htm>

5. Consulting with disability professionals, organizations and websites to identify worksite and training accommodation solutions for individuals with more challenging needs. Suggested resources include:
 - A. Wisconsin Disability Program Navigators: The Disability Navigators will consult at both a program level and on individual cases where disability is a barrier to employment. There is one Disability Navigator in each Workforce Development Area, plus a navigator in Milwaukee who specializes in TANF cases, a navigator in Wausau who specializes in the Southeast Asian population and two navigators who work with the Native American population in Wisconsin. The navigators are housed in Job Centers throughout the state. A fact sheet from the U.S. Department of Labor on the Disability Program Navigator Program can be accessed online at: http://www.doleta.gov/disability/onepagers/dpn_factsheet_april2007.pdf. A contact list for Wisconsin's Disability Program Navigators is attached.
 - B. DVR Counselors: W-2 agencies should be in direct contact with their local DVR programs to discuss areas of coordination such as cross-training and technical assistance. Presently, there is virtually no wait-list for individuals who meet eligibility criteria for DVR services. W-2 agencies should make referrals to DVR for W-2 participants who may benefit from vocational rehabilitation services.
 - C. Job Accommodation Network: This website provides a range of resources related to serving persons with disabilities, including accommodations that have been determined effective for specific types of medical conditions. The main website is at: <http://www.jan.wvu.edu/>. The disability-specific accommodation information can be accessed from the main page by clicking on *JAN Disability A to Z* on the menu on the left side of the screen.

W-2 T cases that may be a lower priority for increasing participation include: 1) Individuals who the W-2 agency has determined are appropriate for SSI Advocacy; 2) Individuals who are recuperating from a short-term illness or injury and have the employment skills to immediately return to work once recovered; and 3) Individuals who are needed in the home full-time to care for a disabled child or other family member. These individuals should be assigned to one of two CARES activities, either Caring for Disabled Child (CD) or Caring for Other Family Member (CF).

W-2 POLICY ON ASSIGNING ACTIVITIES

Through the Regional Offices and the W-2 WEBI monitoring reports, we continue to identify W-2 agency practices that are inconsistent with W-2 policy concerning the number of hours that various types of W-2 activities may be assigned.

Current policy requires that CSJ and W-2 T participants engage in up to 30/28 hours per week of work training activities and up to 10/12 hours per week of education and training activities (There are exceptions for individuals engaged in an Aggregated Education and Training Program. See W-2 Manual Section 8.3.2.2).

Activities that fall under the definition of education and training are prescribed in state statute and can be found in Sections 7.4.1.7 (CSJ Education and Training) and 7.4.2.5 (W-2 T Education and Training) of the W-2 Manual. Activities that may count towards education and training are limited to:

- A course of study meeting the standards established under 115.29(4), Stats., for the granting of a declaration of equivalency of high school graduation;
- Technical college courses and other educational courses that provide an employment skill (includes job skills training);
- Employer-sponsored training;
- English-as-a-Second Language; and
- Adult basic education courses.

Because the list of education and training activities is limited by state statute, all other types of activities assigned in the W-2 program must count towards the assignment of up to 30/28 hours work training activities. The full list of W-2 activities can be found in the CARES Guide under *WP Appendix 01 – Definitions of Components and Statuses*. Under the definition of each W-2 activity, there is a statement as to whether the activity should count towards the 30/28 hour work training activity requirement or the 10/12 hour education and training requirement.

Key points to remember include:

1. Activities that may count towards the 10/12 hours education and training (or towards assignment of Aggregated Education and Training) are limited to those 5 activities listed above.
2. After the initial two weeks in a W-2 placement, it is never appropriate to assign someone to more than 30/28 hours per week of combined work training activities.

USE OF CARES ACTIVITIES: CARING FOR DISABLED CHILD AND CARING FOR OTHER FAMILY MEMBER

As was noted earlier in the memo, CSJ and W-2 T participants who are caring for a disabled family member are excluded from the TANF work participation requirement. In order to be excluded, the participant must be assigned to one of two CARES activities, Caring for Disabled Child (CD) or Caring for Other Family Member (CF). Section 7.4.2.1 of the W-2 Manual provides guidance on use of these activities as part of the W-2 program.

When a participant has multiple barriers to employment including some personal conditions and some related to the care of another disabled family member, it is important that the care of the disabled family member is recorded as part of the 30/28 hours of work training activities assigned to the individual. The CD or CF activity should be a priority when assigning W-2 activities. The caseworker should however continue to assign other types of work training activities when appropriate, again keeping in mind that CSJ and W-2 T participants may participate in up to 30/28 hours per week of work training activities

AGENCY ACTION

W-2 agencies are to use this memo as guide for:

1. Familiarizing W-2 agency staff with Federal TANF Work Participation Requirements;
2. Reviewing W-2 cases to determine what combination of services and strategies will most effectively prepare each participant for employment while ensuring s/he is engaged in work and training activities to the fullest extent possible;
3. Addressing any inconsistencies between agency practices and W-2 policy concerning the number of hours that various types of W-2 activities may be assigned; and
4. Ensuring that the CARES activities, Caring for Disabled Child (CD) and Caring for Other Family Member (CF) are a priority when assigning activities to a participant who is responsible for the care of another disabled family member.

CONTACTS

For Policy Related Questions: BW-2 Regional Office Staff

For CARES Processing Questions: W-2/CC Call Service Center

*Program Categories – FS – FoodShare, MA – Medicaid, 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.