

DEPARTMENT OF WORKFORCE
DEVELOPMENT
Secretary Roberta Gassman
201 East Washington Avenue
P.O. Box 7946
Madison, WI 53707-7946
Telephone: (608) 266-7552
FAX: (608) 266-1784
www.dwd.state.wi.us



State of Wisconsin
Governor Jim Doyle

DEPARTMENT OF HEALTH AND
FAMILY SERVICES
Secretary Kevin R. Hayden
1 West Wilson Street
P.O. Box 7850
Madison, WI 53707-7850
Telephone: (608) 266-9622
FAX: (608) 266-7882
www.dhfs.wisconsin.gov

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:	08-12				
DATE:	03/17/2008				
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		
PRIORITY: HIGH					

SUBJECT: Updates to Wisconsin Works (W-2) CARES Activities and the Impacts on Work Participation Documentation and Verification Procedures

CROSS REFERENCE: [Operations Memo 07-55, W-2 Work Participation Documentation, Verification and Supervision Policy and Procedures](#)
[Operations Memo 06-44, Wisconsin Works \(W-2\) CARES Activities](#)

EFFECTIVE DATE: April 5, 2008

PURPOSE

This memo describes:

1. Changes to some W-2 work program activities that can be posted on WPCS;
2. Actions steps that W-2 agencies must take to get participants assigned to new activities appropriately and steps the Department is taking to assist agencies with this process;
3. How the activity changes will impact on the Work Participation Documentation, Verification and Supervision Policy and Procedures laid out Operations Memo 07-55; and
4. Documentation requirements when assigning Physical Rehabilitation (PR) as an activity.

BACKGROUND

In November 2007, the Department sought input from W-2 agencies and other program stakeholders through the Policy Program and Operations Workgroup on strategies for simplifying the assignment and tracking of W-2 activities that do not get counted towards the Federal TANF Work Participation rates. The Department reviewed the recommendations from the workgroup and determined what could feasibly be changed to reduce the workload for W-2 workers. This memo includes those changes as well as some additional updates to the definitions of some W-2 activities that are necessary to bring the W-2 program into compliance with Federal TANF Work Participation requirements.

W-2 ACTIVITY UPDATES

Activities No Longer in Use

Two activities are no longer in use. These are:

1. Personal Care/Self Care (PC); and
2. Other Medical (OM)

These activities have been combined into one new activity which is defined below.

New Activities

The following activities and their associated CARES codes will be added April 5, 2008. These activities will not count towards a participant's Federal TANF Work Participation requirement:

1. Ongoing Medical/Personal Care (MP)

New Definition:

Report this activity when a participant is involved in ongoing medical appointments or during timeframes when a participant cannot be assigned to other work activities due to medical restrictions that are expected to last more than six months. The medical restrictions and the expectation that the activity will last more than six months must be certified by a qualified medical or mental health professional.

Reasons for the Change:

- 1) Currently over 600 W-2 participants are assigned to both Other Medical (OM) and Personal Care/Self Care (PC). Combining these two activities into one activity will lesson the amount of entries needed in CARES.
- 2) Along with combining these activities, the Department has also modified the participation documentation and verification requirements to reduce agency workload. The new requirements are described below under *Changes to W-2 Work Participation Documentation, Verification and Supervision Requirements*.

Department Action Steps:

The Ongoing Medical/Personal Care (MP) activity will be available on reference table TCOS to assign as an activity beginning on April 5, 2008.

The Department will run a one-time batch process in CARES on April 4, 2008. This batch process will identify all W-2 cases that are assigned to either Other Medical (OM) or Personal Care/Self Care (PC) or to both activities as of that date.

- 1) For cases that are assigned to either Other Medical (OM) or Personal Care/Self Care (PC), but are not assigned to both activities, the batch process will end-date the old

activity on WPCH effective April 4, 2008 with a "Q" completion code (completed by CARES). On April 5, 2008, the new activity Ongoing Medical/Personal Care (MP) will be recorded on WPCS with a Component Begin Date of April 5, 2008. All other fields on WPCS will be populated through the batch process with the information that had previously been recorded by the agency for the old activity as of April 4, 2008.

- 2) For cases that are assigned to both Other Medical (OM) and Personal Care/Self Care (PC), the batch process will end-date both activities on WPCH effective April 4, 2008 with a "Q" completion code (completed by CARES). Because the information previously recorded on WPCS as of April 4, 2008, for each of these activities may be different (i.e., different assignments for hours, different anticipated end dates, etc.), the Department will use the following criteria/information to populate the fields for the new Ongoing Medical/Personal Care (MP) activity:
 - A. Begin Date: New activity will be recorded with a Begin Date of April 5, 2008;
 - B. Staff ID: Will use the current FEP ID;
 - C. Provider ID: Will use the Provider ID that was recorded for the Personal Care/Self Care (PC) activity as of April 4, 2008. The PINS will be tracked and shared with agencies for all cases where the Provider ID for Personal Care/Self Care (PC) was different than the Provider ID for Other Medical (OM).
 - D. Weekly Scheduled Hours: Will combine the total weekly hours that had been assigned as of April 4, 2008, for Personal Care/Self Care (PC) and Other Medical (OM), but will record no more than 30 hours since that is the maximum that should be recorded per W-2 policy.
 - E. Daily Scheduled Hours: Will compare hours assigned as of April 4, 2008, for Other Medical (OM) and Personal Care/Self Care (PC) and record the greater number of the two.
 - F. Frequency (Days Per Month): Will compare number of days assigned as of April 4, 2008, for Other Medical (OM) and Personal Care/Self Care (PC) and record the greater number of the two.
 - G. Funding Source: Will use CARES code *WTWO*. The PINS will be tracked and shared with agencies for all cases where the Funding Source code for Personal Care/Self Care (PC) was different than the Funding Source code for Other Medical (OM).
 - H. Employer Provider ID, Site ID, DOT and Non-Approval Code: These fields on WPCS are not required and not appropriate for this type of activity. No information will be recorded.
 - I. Anticipated End Date: Will compare dates recorded for Other Medical (OM) and Personal Care/Self Care (PC) as of April 4, 2008, and record the date that is farther out of the two. If the anticipated end date is prior to April 4, the date will be reset to April 5. This date can then be adjusted as appropriate.
 - J. W-2 Sanction Indicator: Will record Yes for all cases.

Agency Action Steps:

Agencies may elect to take one or more of the following action steps:

- 1) As noted above, the PINS will be tracked and shared with agencies for all cases where the Provider IDs and/or the Funding Sources for the Personal Care/Self Care (PC) and Other Medical (OM) activities were different as of April 4, 2008. If agencies use these fields internally for any type of reporting, they may elect to update the fields in these cases to accurately reflect provider and funding information.
- 2) Sometime after April 5, 2008, agencies may use the WPFN function to identify all cases assigned to the new Ongoing Medical/Personal Care (MP) activity and review screen WPCH on each case for accuracy.
- 3) As part of the Employability Plan review process that must occur for each W-2 case at least every six months, agencies should review WPCH and for any cases assigned to

the new Ongoing Medical/Personal Care (MP) activity, review and update the fields as needed;

2. Family Member Treatment/Counseling (FC)

New Definition:

Report this activity when a participant is attending appointments on a weekly basis for the treatment of another W-2 group member's medical, AODA or mental health needs.

Reasons for the Change:

- 1) Currently, there is no CARES activity available for a participant who is assigned to attend appointments for family members as part of his/her Employability Plan.
- 2) When other CARES activities such as Mental Health Counseling (CM) or Caring for Disabled Child (CD) are used under these circumstances, it may result in the Department reporting erroneous information to the Federal Administration for Children and Families about Wisconsin's Federal Work Participation rates.

Department Action Steps:

The Family Member Treatment/Counseling (FC) activity will be available on reference table TCOS to assign as an activity beginning on April 5, 2008.

The following fields will be required when entering this activity on WPCS:

- Phase
- Begin Date
- Staff ID
- Provider ID
- Weekly Scheduled Hours
- Daily Scheduled Hours
- Frequency Days per Month
- Funding Source
- Anticipated End Date

Agency Action Steps

If an agency has made it a common practice to use other CARES activity codes to represent the time on an EP that a participant spends attending other family members' appointments, there should be a review of all W-2 cases assigned to that activity to determine if the participant should be reassigned to the new Family Member Treatment/Counseling (FC) activity.

Example:

Marie is assigned to a W-2 T placement because of medical problems that resulted from recent back surgery. She is making progress in her physical rehabilitation and is currently able to participate at a work experience site 10 hours per week. Her 5 year old son, Alex, has been diagnosed with Oppositional Defiant Disorder and is seen by a specialist weekly for treatment and counseling. On WPCS, Marie was assigned to 10 hours of Work Experience (WE) and 15 hours of Physical Rehabilitation (PR). She was also assigned to 4 hours per week of Mental Health Counseling (CM) for the appointments she attends each week for her son's treatment and counseling. With the availability of the new Family Member Treatment/Counseling (FC) activity, the worker reviews Marie's EP and determines that the assignment to the Mental Health Counseling (CM) activity should be end-dated and Marie should be assigned to Family Member Treatment/Counseling (FC) for 5 hours per week.

Should the New Activities be Used by FSET or Children First?

Ongoing Medical/Personal Care (MP) – may be used in both the FSET and Children First programs.

Family Member Treatment/Counseling (FC) – may be used in FSET but not Children First.

Changing how SSI Advocacy (SD) is Posted on WPCS

The definition of SS(D)I Advocacy/Application (SD) will remain the same and the activity must continue to be posted on WPCS. However, beginning on April 5, 2008, the fields on WPCS that require an entry will change:

1. Fields that will continue to require an entry include:

- Phase
- Begin Date
- Staff ID
- Provider ID
- Funding Source
- Anticipated End Date

2. Fields that will not allow an entry include:

- Daily Scheduled Hours
- Weekly Scheduled Hours
- Frequency (Days Per Month)
- W-2 Sanction Indicator
- Employer Provider ID
- Site ID
- DOT
- Non-Approval Code

Reasons for the Change:

Since implementation of the W-2 Work Participation Documentation, Verification and Supervision requirements in October 2007, W-2 agencies have expressed concerns about the requirement to post daily and weekly schedule information for SSI Advocacy/Application (SD) on WPCS. Given how the SSI application process works, it is unlikely that participants will consistently be engaged in hours of participation on a weekly basis. There is agreement

however, between the Department and those W-2 agencies that were consulted, that agencies must continue to have the ability to record SS(D)I Advocacy/Application (SD) as an activity.

Department Action Steps:

The Department will run a one-time batch process that will identify all W-2 cases currently assigned to the SS(D)I Advocacy/Application (SD) activity and end the activity on April 4, 2008 with a "Q" completion code. On April 5, 2008, the batch process will reopen the activity on WPCS with all information removed from those fields listed above that are no longer enterable.

Agency Action Steps

No agency actions are needed.

Changes to Definitions for Existing Activities

The activity Employment Search (ES) will remain in use, but the definition has been updated below (changes are underlined):

Employment Search (ES): Report this activity for participants who are engaged in employment search that is tailored to the needs of the individual and includes some or all of the following activities:

- Time used to research prospective employers;
- Making contact with prospective employers whether by phone, in person or via internet to learn of job openings;
- Completing applications for vacancies;
- Preparing for job interviews;
- Interviewing for jobs.

Activity may be completed independently or in a group setting. When traveling to job interviews, the travel time between interviews may be counted toward hours of participation. Travel time to the first job interview and the time spent returning home after the last one cannot be counted.

Reason for the Change

The policy concerning when travel time may be counted towards hours of participation in Employment Search (ES) was covered in Operations Memo 07-55. The update to the definition of Employment Search (ES) covered in this Operations Memo was done to align the activity definition with the policy.

Changes to W-2 Work Participation Documentation, Verification and Supervision Requirements

As part of the process of creating two new activities, Ongoing Medical/Personal Care (MP) and Family Member Treatment/Counseling (FC), the procedures for W-2 Work Participation Documentation, Verification and Supervision have also been updated. Neither activity will count towards Federal TANF Work Participation Rates. Workers must follow the procedures below for individuals assigned to either of these new activities:

Documentation: Appropriate assessment documentation or required DFS forms constitute documentation.

Verification: W-2 agency is required to document in the case file (either CARES case comments or ECF) ongoing quality case management practices. At a minimum, this includes documenting monthly contact with participant.

Supervision: FEP will have contact (phone or face-to-face) at least once a month with participant to discuss progress in activities determined appropriate by the W-2 agency.

Note: This update reduces documentation and verification requirements for participants who were previously assigned to Personal Care/Self Care (PC). There is no change to documentation and verification requirements for participants who were previously assigned to Ongoing Medical (OM).

Clarification on Documentation for Physical Rehabilitation (PR)

The BW-2 Regional Offices have indicated there is a need for the Department to provide further clarification on use of the Physical Rehabilitation (PR) activity and what constitutes appropriate documentation of work participation for this activity. The definition for Physical Rehabilitation (PR) was updated in Operations Memo 06-44 to say the following:

Report this activity for participants who are engaged in an activity that meets the following criterion:

- 1. Determined to be medically necessary;*
- 2. Anticipated to last six months or less; and*
- 3. Geared towards helping the individual recover from a medical condition so that s/he may enter or re-enter the workforce.*

The determination that the activity is medically necessary and the expectation that the rehabilitation activity will last six months or less must be certified by a qualified medical or mental health professional.

This activity should not be assigned when a participant is in the process of applying for SSI or SSDI and the W-2 agency or another provider is providing related advocacy services.

The Operations Memo further went on to state:

The new definition for PR - Physical Rehabilitation may now include any type of medically necessary activities that are anticipated to last six months or less and geared towards helping the individual recover from a medical condition so that s/he may enter or re-enter the workforce. This may include bed rest or personal care activities conducted in the home provided it meets all of the other criteria laid out in the new definition.

Because Physical Rehabilitation (PR) is intended to be used short-term (i.e., six months or less) and is geared towards helping a participant recover so that s/he may enter or re-enter the workforce, the hours spent in this activity may be counted towards Federal TANF Work Participation Requirements. The activity is considered a Core activity under the federal category, Job Search and Job Readiness.

Operations Memo 07-55 included a chart laying out the Documentation, Verification and Supervision criteria for each W-2 activity. In this chart, Physical Rehabilitation (PR) is broken out into Facilitated Physical Rehabilitation and Self-Directed Physical Rehabilitation.

The method of documentation for Facilitated Physical Rehabilitation is an individual activity log which must be signed by qualified provider or staff of qualified provider e.g., medical receptionist, nurse aid, etc. As indicated in Operations Memo 07-55, the individual activity log must be received from the participant at least twice per month and must contain:

1. Participant's Name
2. Date of Activity

3. Start Time
4. End Time
5. Daily Actual Hours
6. Activity Description
7. Supervisor's Signature/Electronic Signature
8. Supervisor's Phone Number

The methods of documentation for Self-Directed Physical Rehabilitation include both an individual activity log and a treatment plan. The treatment plan is the documentation from the medical provider indicating the need for the rehabilitation activity and the type and frequency of treatment that is needed. This documentation should assist the worker in determining how many hours per week to assign and the length of time the participant is expected to be in the activity. As indicated in Operations Memo 07-55, the individual activity log must be received from the participant on a weekly basis and must contain:

1. Participant's Name
2. Date of Activity
3. Start Time
4. End Time
5. Daily Actual Hours
6. Activity Description
7. Signature of W-2 agency staff verifying participation

Example:

Sarah is a W-2 T participant who is recovering from recent back surgery. Her physician has completed a Medical Examination & Capacity form indicating that during the next 6 weeks, Sarah will be attending physical therapy appointments at a medical clinic five days a week for one hour each day. With the exception of the physical therapy appointments, Sarah must remain at home on bed rest for the next six weeks. A reevaluation of her progress will be done at that time. Sarah is expected to make a full recovery and should be able to return to regular full-time physical activity within four to six months.

Based on the information provided in the Medical Examination & Capacity Form, Sarah's caseworker assigns her to 28 hours per week of Physical Rehabilitation activities keeping in mind that work training activities must be limited to 28 hours per week for a W-2 T placement. Sarah must submit an individual activity log for 5 hours each week of physical therapy appointments at the medical clinic (i.e., Facilitated Physical Rehabilitation) and for 23 hours each week of activities performed in the home while on bed rest (i.e., Self-Directed Physical Rehabilitation). Note that for Self-Directed Physical Rehabilitation, the activities being described may include such things as bed rest, self-care, food preparation, etc.

CONTACTS

For Policy Related Questions: BW-2 Regional Office Staff

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

ATTACHMENT

Chart: Wisconsin Works Documentation, Verification and Supervision Criteria

Note: The Wisconsin Works Documentation, Verification and Supervision Criteria chart is also available and kept up-to-date on the [W-2 Partner Page](#).

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.

DWD/DFS/BW-2/HH