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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 Working Families  
Division of Family and Economic Security

DFES OPERATIONS MEMO					
<b>No:</b>	09-59 - <b>AMENDED</b>				
<b>DATE:</b>	OCTOBER 7, 2009				
<b>FS</b>	<input type="checkbox"/>	<b>MA</b>	<input type="checkbox"/>	<b>BC+</b>	<input type="checkbox"/>
<b>SC</b>	<input type="checkbox"/>	<b>CTS</b>	<input type="checkbox"/>	<b>CC</b>	<input type="checkbox"/>
<b>W-2</b>	<input checked="" type="checkbox"/>	<b>FSET</b>	<input type="checkbox"/>	<b>EA</b>	<input type="checkbox"/>
<b>CF</b>	<input type="checkbox"/>	<b>JAL</b>	<input type="checkbox"/>	<b>JC</b>	<input type="checkbox"/>
<b>RAP</b>	<input type="checkbox"/>	<b>WIA</b>	<input type="checkbox"/>	<b>Other</b>	<input type="checkbox"/>
				<b>EP</b>	<input type="checkbox"/>
<b>PRIORITY: High</b>					

**SUBJECT:** Addressing Problems with Payment Reductions in CARES

**CROSS REFERENCE:** [Operations Memo 06-45, Modification to Wisconsin Works \(W-2\) Good Cause Policy Based on TANF Reauthorization](#)

**EFFECTIVE DATE:** October 19, 2009

### PURPOSE

This memo provides information and instructions regarding CARES changes being implemented to address problems with how payment reductions are imposed in CARES.

### BACKGROUND

The Department has identified a problem in CARES that is resulting in some payment reductions being imposed to W-2 payments inappropriately. This memo will describe the case scenarios in CARES where problems occur and explain the changes being implemented in CARES to address the problems.

**CARES INFORMATION AND INSTRUCTIONS**Problem Scenario One:

1. The participant is in either a W-2 T or CSJ and non-participation is entered on screen WPNP; and
2. The worker subsequently backdates the begin date of an unpaid placement or a CMC placement to a date prior to when the non-participation date occurred.

*Example:*

Participant is an ongoing CSJ placement during participation period from 9/16 through 10/15. Worker enters daily non-participation for time period from 10/1 to 10/15. On 10/16 worker backdates the begin date of the CMF placement to 10/6 resulting in the CSJ being end-dated effective 10/5.

In this example, the non-participation that occurred after the CMF placement began (10/6 to 10/15) is resulting in a payment reduction to the last W-2 payment covering the timeframe from 9/16 to 10/5.

*CARES Fix – No Worker Action Required*

Effective October 19, 2009, new functionality is being added to CARES to prevent payment reductions from being imposed when a worker either backdates the begin date of a new unpaid placement or a CMC placement to a date prior to when the non-participation date occurred.

The record of the non-participation would remain on WPNP, however no payment reduction would be imposed for any non-participation that occurred after the paid placement ended.

Problem Scenario Two:

1. The participant is in either a W-2 T or CSJ and non-participation is entered on screen WPNP; and
2. The worker subsequently backdates the end-date of the paid placement and ends the W-2 episode.

*Example:*

Participant is an ongoing CSJ placement during participation period from 9/16 through 10/15. Worker enters daily non-participation for time period from 10/1 to 10/15. On 10/16 worker backdates the end date of the CSJ to 10/6, but there is no new placement entered.

In this example, the non-participation that occurred after the CSJ placement ended (10/7 to 10/15) is resulting in a payment reduction to the last W-2 payment covering the timeframe from 9/16 to 10/6.

*CARES Fix – No Worker Action Required*

Effective October 19, 2009, new functionality is being added to CARES to prevent payment reductions from being imposed when the worker backdates the end-date of the paid placement and ends the W-2 episode on a date prior to when the non-participation date occurred.

CARES will delete any record on WPNP of non-participation that occurred after the paid placement ended.

Problem Scenario Three:

[Operations Memo 06-45](#) informed agencies that effective October 1, 2006, FEPs must only post daily non-participation. When posting hours of non-participation on WPNH, the date entered in the *NON-PART DATE* field must be the same as the date entered in the *THRU* field. The total *NP HOURS* entered must only be up to 8 hours of nonparticipation per day.

Through monitoring, the Department continues to see cases periodically where the worker posts multiple days of non-participation as part of the same entry (i.e., the *NON-PART DATE* field does not match the *THRU* field).

If non-participation is entered for multiple days and the worker subsequently backdates the end date of the paid placement into that period of non-participation, a payment reduction is imposed for the full period of non-participation.

*Example:*

Participant is an ongoing CSJ placement during participation period from 9/16 through 10/15. Worker enters multiple days of non-participation from 10/5 through 10/10 as part of the same entry. On 10/13, worker backdates the end date of the CSJ placement to 10/8 and ends the W-2 episode.

In this example, the non-participation that occurred after the CSJ placement ended (10/9 to 10/10) is resulting in a payment reduction to the last W-2 payment covering the timeframe from 9/16 to 10/8.

*CARES Fix – Worker Action Required*

Effective October 19, 2009, new functionality is being added to CARES. When multiple days of non-participation are posted as part of the same entry, CARES is unable to determine the amount of non-participation that occurred on each day. Therefore, an edit will prevent the worker from ending a placement that falls within a timeframe where the worker has entered multiple days of non-participation as part of the same entry. If the worker attempts to end-date a paid placement on WPWW on a date that falls in the middle of a period of non-participation, the following error message will appear:

*NON-PARTIPATION HRS EXIST AFTER THE W-2 END DT. PLEASE DELETE.*

In order to end the placement, the worker must first delete the non-participation and reenter appropriate days of non-participation one day at a time. The worker may then navigate to WPWW to end-date the placement and the W-2 episode.

Problem Scenario Four:

This scenario occurs when a participant is in a paid placement, non-participation is entered for multiple days as part of the same entry (i.e., the *NON-PART DATE* field does not match the *THRU* field), and worker subsequently backdates the begin date of an unpaid placement or a CMC placement into that period of non-participation. As a result a payment reduction is imposed for the full period of non-participation.

*Example:*

Participant is an ongoing CSJ placement during participation period from 9/16 through 10/15. Worker enters multiple days of non-participation from 10/5 through 10/10 as part of the same entry. On 10/13, worker backdates a CMF placement to 10/8.

In this example, the non-participation that occurred after the CSJ placement ended (10/9 to 10/10) is resulting in a payment reduction to the last W-2 payment covering the timeframe from 9/16 to 10/8.

*CARES Fix – Worker Action Required*

Effective October 19, 2009, new functionality is being added to CARES. When multiple days of non-participation are posted as part of the same entry, CARES is unable to determine the amount of non-participation that occurred on each day. Therefore, an edit will prevent the worker from backdating the begin date of an unpaid placement or a CMC placement into that period of non-participation. If the worker attempts to backdate the begin date of unpaid placement or a CMC placement on WPWW to a date that falls in the middle of a period of non-participation, the following error message will appear:

*NON-PARTICIPATION HRS EXIST AFTER END DT OF PD PLACEMENT. PLS UPDATE.*

In order to backdate the begin date of the unpaid placement or CMC placement, the worker must first delete the non-participation and reenter appropriate days of non-participation one day at a time.

**NEW FIELD ON SCREEN WPNP**

Effective October 19, 2009, a new field, *SANC IND* (short for Sanction Indicator), is being added to screen WPNP to inform workers of which rows of non-participation will result in a payment reduction. If the *SANC IND* field displays a <Y>, a payment reduction will be imposed for that record of non-participation.

If the *SANC IND* field displays a <N> a payment reduction will not be imposed. A <N> would be displayed in the following circumstances:

1. The participant was in an unpaid placement or CMC placement during the timeframe in which the non-participation occurred.
2. The activity that was recorded is not allowed to be sanctioned (e.g., any W-2 assessment activities, Working Full-Time, Working Part-Time).
3. The Incomplete BST Indicator (i.e., *INC BST IND*) is displaying a <Y> meaning the BST has not yet been completed or declined for this participant.
4. The Ongoing Assessment Indicator (i.e., *ONG ASMT IND*) is displaying a <Y> meaning there is currently an assessment activity open on WPCS.

Below is a screen shot of WPNP with the new *SANC IND* field shaded:

NON-PARTICIPATION		ACT	COMP	NON-PART			GOOD CAUSE		INC	ONG	SANC		DEL
BEGIN DATE	END DATE	CD	STAT	TYP	RSN	HRS	RSN	HRS	IND	IND	IND		
08 04 2009	08 07 2009		ES	AG	XX	012					N	N	
08 01 2009	08 01 2009		WE	AG	CC	004					N	N	
08 01 2009	08 01 2009		ES	AG	XX	004					N	N	
07 07 2009	07 07 2009		ES	AG	AF	004			N		N	N	
07 02 2009	07 02 2009		ES	AG	AF	004			N		N	Y	
06 29 2009	06 29 2009		ES	AG	AF	004			N		N	Y	

**CONTACTS**

For Policy Related Questions: BWF Regional Office Staff

For CARES Processing Questions: W-2/CC Help Desk

\*Program Categories – FS – FoodShare, MA – Medicaid, BC+ – BadgerCare Plus, 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.

DCF/DFES/BWF/HH