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**State of Wisconsin
Governor Scott Walker**

**TO: Income Maintenance Supervisors
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**FROM: Shawn Smith, Bureau Director
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Department of Children and Families

BEPS/BWF OPERATIONS MEMO					
No: 15-J3					
DATE: 03/18/2015					
FS	<input checked="" type="checkbox"/>	MA	<input type="checkbox"/>	BC+	<input type="checkbox"/>
SC	<input type="checkbox"/>	CTS	<input checked="" type="checkbox"/>	FSET	<input type="checkbox"/>
BC+ Basic	<input type="checkbox"/>	BC+ CORE	<input type="checkbox"/>		
W-2	<input checked="" type="checkbox"/>	EA	<input type="checkbox"/>	CF	<input type="checkbox"/>
JAL	<input checked="" type="checkbox"/>	RAP	<input type="checkbox"/>	Other EP	<input type="checkbox"/> *

SUBJECT: CARES Worker Web Changes to Support Wisconsin Works Child Support Cooperation Policy

CROSS REFERENCE: [W-2 Manual, Chapter 15: Child Support](#)
Process Help for Absent Parent Page
Process Help for Noncooperation Instance Tracking Page

EFFECTIVE DATE: March 21, 2015

PURPOSE

The purpose of this memo is to:

1. Announce changes to the CARES Worker Web (CWW) **Child Support Information** section of the **Absent Parent** page; and
2. Clarify policy requirements regarding cooperation with Child Support (CS).

BACKGROUND

Currently, CWW does not allow workers to pend eligibility for proof of Child Support (CS) cooperation or a good cause claim. Because of this, when the Child Support Agency (CSA) communicates that an individual is not cooperating, the Financial and Employment Planner

(FEP) must use the manual [Request for Verification form \(DWSP-2303\)](#) to communicate with the individual. This manual process is error prone and has resulted in Legislative Audit Bureau (LAB) findings of noncompliance with Wisconsin Works (W-2) Manual section 15.4.1 regarding timely and accurate follow-up on noncooperation with CS. The LAB findings reveal that W-2 agencies are not following policy that requires FEPs to close a W-2 assistance group (AG) if, after being given seven working days to do so, an individual in the AG is not cooperating with CS or has not filed a good cause claim.

Additionally, W-2 Manual section 15.4.3 requires that when an individual has accumulated three instances of CS noncooperation, the individual loses W-2 eligibility for six months or until he or she cooperates, whichever is longer. There is an antiquated noncooperation tracking screen in the legacy CARES mainframe system. However, FEPs have used this screen inconsistently.

In order to promote effective communication between agency staff and participants, reduce agency workload, and support W-2 policy, the Department of Children and Families (DCF) is enhancing the process for requesting CS cooperation verification for W-2 eligibility determinations and for tracking noncooperation instances. DCF is also creating a new CWW noncooperation tracking page. These enhancements will help the Bureau of Working Families (BWF) meet its goal of eliminating LAB findings resulting from lack of W-2 agency compliance with CS noncooperation policy.

- **Note:** The DCF Division of Early Care and Education will issue a separate operations memo to provide guidance on Child Care (CC) (also known as Wisconsin Shares) policy and impacts of CWW changes to Child Care agencies.

POLICY

There are no policy changes associated with this memo. The following are policy clarifications.

WISCONSIN WORKS

- 1) Section 15.4.1: *Requirements When the CSA Determines Noncooperation* is clarified and states the maximum timeframe for a FEP to act on a CWW alert regarding noncooperation with CS;
- 2) Section 15.5.1: *Noncooperation Exemption for Pregnant Women or Custodial Parents with Newborns* is clarified for consistency with [Wisconsin Administrative Rule DCF 102.09\(3\)](#);
- 3) Section 15.6: *Good Cause Claim for Noncooperation with the CSA* is clarified based on the CWW enhancements effective March 21, 2015 (see below); and
- 4) Section 15.7.3 *Determination that Good Cause Does Not Exist* is clarified regarding consistency with 15.7.4.

All of the above-referenced W-2 Manual sections are attached to this memo. Because the language in each section has been clarified and simplified for easier understanding, the changes were not tracked.

FOODSHARE

CS cooperation is no longer a requirement for FoodShare for custodial or non-custodial parents.

CARETAKER SUPPLEMENT

Whenever a potentially eligible child in a Caretaker Supplement (CTS) household has an absent parent, the parent that is caring for the child must cooperate with the local CSA. If the parent does not cooperate or discontinues cooperation, a CTS application will be denied or eligibility will be terminated. When a CTS-eligible parent has children who have different absent parents, the CTS-eligible parent must cooperate with the CSA regarding each child's absent parent.

CARES CHANGES

CARES/KIDS INTERFACE AND ALERTS

When the CSA determines that an individual is not cooperating or has begun cooperating, the CSA worker enters this information into the Kids Information Data System (KIDS). KIDS sends this information to CARES through a nightly batch process. Currently, the CARES nightly batch process generates an alert, informing the FEP of the cooperation status. In addition to generating an alert, the batch process will now simultaneously auto-populate the **Cooperation** field to NO or YES, based on cooperation status.

Text for cooperation status alerts will be updated as follows:

- Current 092 text - NONCOOPERATION INFO. SEE IVDI
 - New 092 text – CS NONCOOP SEE ABSNT PRNT PAGE
 - Current 326 text - NCOP ENDED, SEE IVDE, RUN SFED
 - New 326 text - CS NONCOOP ENDED RUN ELGBLTY
- **Note:** As described in Operations Memo [14-14](#), *CWW Enhancements to Worker Alerts and Wisconsin Works Program Request Functionality*, FEPs may check alerts either on the Action Items list in CWW or on CARES screen CMWA. Alerts displayed in the Action Items list display only the alert text and do not include the alert number.

CWW CHANGES

To support W-2 policy, the existing Absent Parent page will be enhanced so that workers can pend W-2 and generate a Notice of Proof Needed when an individual is not cooperating with the CSA and has not provided a good cause reason for not cooperating. Additionally, a new page will be added to CWW so that workers can track instances of CS noncooperation.

These CWW changes do not affect CTS or Health Care programs. The CWW functionality for those programs will not change.

Absent Parent Page

Because CC is considered to be a component of W-2 by statute, only the FEP must act on CS cooperation and good cause claims when CC and W-2 are both open on a case. When CC and W-2 are both open on a case in which there is CS noncooperation, the FEP must update the **Child Support Information** section of the page. When W-2 is open on a case, the fields in the **Child Support Information** section below the **Cooperation** field will be protected for Income Maintenance (IM) workers so that only the FEP can make entries. When W-2 is not open, the fields will not be protected and the IM worker must make the relevant entries.

The **Child Support Information** section of the **Absent Parent** page will be enhanced according to the chart below.

FIELD NAME	CHANGE
Cooperation	<ul style="list-style-type: none"> The system will autopopulate this field with the value of NO or YES at the same time the system generates the cooperation status alert. This field will be protected and workers will no longer be able to make entries. W-2 Help Desk and DHS CARES Call Center staff will have the ability to manually update this field. When a worker creates a new Absent Parent page, this field will default to YES because there has not yet been a referral to CS.
Noncooperation Instance Count	<ul style="list-style-type: none"> This is a new field. It will auto-populate based on the custodial parent's noncooperation instance count on the Child Support Noncooperation Instance Tracking page.
Good Cause Claimed	<ul style="list-style-type: none"> A ? will be added to the drop-down menu and will auto-populate when Cooperation auto-populates to NO <u>and</u> the existing good cause values are not values that will result in W-2 eligibility ending (also referred to as "passing values"). The ? will allow FEPs to pend W-2 eligibility and generate the Notice of Proof Needed notice. Individuals are permitted to claim good cause even if they are cooperating with the CSA. Therefore, workers will be allowed to indicate that Good Cause has been claimed when Cooperation is YES. Currently, CWW will not allow Good Cause Claimed to be YES when Cooperation is YES.
Good Cause Reason	<ul style="list-style-type: none"> The four existing drop-down values relating to potential physical or emotional harm to parent or child will be consolidated into the following single reason: PP – PHYS. OR EMOTIONAL HARM TO PARENT OR CHILD, INCLDNG DV. The IE – INSUFFICIENT EVIDENCE and NG – NOT GRANTED drop-down values will be deleted.
Good Cause Claim Date	No changes

Good Cause Granted	The field will be renamed Good Cause Approved.
Good Cause Result	<p>The existing drop-down value P – PURSUE OR PROCEED WITH CHILD SUPPORT AND MEDICAL SUPPORT will be changed to P – PROCEED WITH CHILD SUPPORT OR MEDICAL SUPPORT.</p> <p>Note for FEPs: Do not use the existing FAIR HEARING REQUESTED value which is for IM workers only.</p>

The system will update the **Begin Month** field of the **Caretaker Relative Cooperation Information** section at the same time that the **Cooperation** field is auto-populated.

Absent Parent
Cancel

Total: 2

Absent Parent Information

Effective Period

Last Updated: 02/20/2015

Delete Month: / Delete Reason:

Absent Parent Information

Check if Absent Parent Known Sequence: 2

*First Name MI *Last Name Suffix *Gender SSN Birth Date

Absent Parent Address

Number Unit Direction St / Rural Rt / Box Number Suffix Quadrant Apt

Additional Address Info

City State ZIP - Phone

Absent Parent Additional Information

Absent Parent KIDS PIN:

* Absence Begin Date: * Absence Reason:

* Refer to IV-D? Reason for Not Referring:

Maiden Name: Marriage Date:

Caretaker Relative Cooperation Information

Effective Period

* Begin Month: / Last Updated: 12/12/2014

Caretaker Relative

* Individual:

Child Support Information

* Cooperation: Non-Cooperation Instance Count: 0

Good Cause Claimed: Good Cause Reason:

Good Cause Claim Date: Good Cause Approved: Good Cause Result:

Medical Support Liability Information

* Cooperation:

Good Cause Claimed: Good Cause Reason:

Good Cause Claim Date: Good Cause Granted: Good Cause Result:

Enter New Begin Month: /

Notice of Action Needed

When a FEP pends W-2 eligibility in order to give an individual an opportunity to cooperate with CS or to file a good cause claim, CWW will generate the Notice of Action Needed, advising the individual to submit a Child Support Good Cause Claim form or cooperate with CS. As described in the chart above, the **Good Cause Claimed** field will auto-populate with ? at the same time the **Cooperation** field auto-populates with NO. When this occurs, the FEP must initiate eligibility and complete the eligibility driver flow to pend W-2 for CS cooperation.

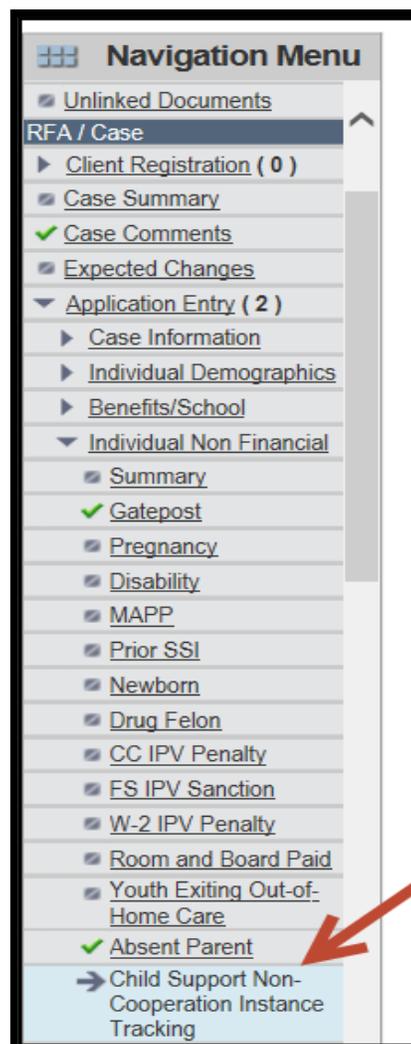
- **Note:** If the good cause claimed fields were populated with passing values, the passing values will be retained when the **Cooperation** field changes to NO. The FEP must not change the **Good Cause Claimed** field from YES to ? if good cause has either been approved or is still unknown.

For additional details on how to pend W-2 in CWW, please refer to the [CARES Worker Web Application Entry Desk Aid](#) available on the [PTS Learning Center](#).

In a W-2 only case or a case with both CC and W-2, the notice will instruct the recipient to submit the Good Cause Claim form to the FEP. As referenced earlier, this is because policy requires that the FEP make good cause determinations when the case includes W-2. Because CWW will now generate the Notice of Action Needed, FEPs must no longer use the manual [Request for Verification form \(DWSP-2303\)](#) to notify individuals of the requirement to cooperate or file a good cause claim.

Child Support Noncooperation Instance Tracking Page

A member of a W-2 Group who fails to cooperate with CS three times without an exemption or good cause is ineligible for W-2 until all members of the W-2 Group cooperate or for a period of six months, whichever is later. To facilitate accurate tracking of noncooperation instances and application of six month sanction periods, a new instance tracking page will be added to CWW. Tracking will be PIN-based and instances will follow individuals who move to other cases.



After confirming a W-2 closure for reason 211 (You have not cooperated with the Child Support Agency and you have not given your worker a good reason for not cooperating), FEPs must manually navigate to the **Child Support Noncooperation Instance Tracking** page and enter the following CS noncooperation details:

1. The name of the **Individual** who is not cooperating with CS;
2. The noncooperation **Instance Effective Begin Date**, which must always be the first of the month following the eligibility run date; and
3. The **Sanction Begin Date** if the noncooperation instance is three or greater. This field will only be enabled if the **Non-cooperation Instance Count** is greater than 3. The **Sanction Begin Date** must match the **Instance Effective Begin Date**. In Phase II, the six month **Sanction End Date** will be calculated by the system based on the **Sanction Begin Date**.

Child Support Non-Cooperation Instance Tracking Cancel Reset

Effective Period

Last Updated: 02/19/2015

Delete: Delete Reason:

Instance Details

* Individual:	██████████ 26M PP	Sequence:	1
* Non-Cooperation Instance Count:	1	Case Number:	1150806010
* Instance Effective Begin Date:	04/01/2015		

Sanction Information

Sanction Begin Date:

Sanction End Date:

Each time a worker enters and saves a new instance of noncooperation, the individual's **Noncooperation Instance Count** field will be auto-populated by the system and will increase incrementally. Like other CWW pages, to save the entries on the page, the worker must either press Enter or click Update. After saving the page, the user will see the most recent noncooperation instance count.

Automation of Noncooperation Instance Count and Sanction Period

Phase II enhancements to fully automate the **Child Support Noncooperation Instance Tracking** page are planned for June 2015 and will be described in a future operations memo. The enhancements will include the system auto-populating all the fields on the **Child Support Noncooperation Instance Tracking** page and automatically applying the six-month sanction period.

Page Security

Once a worker has saved the entries on the **Child Support Noncooperation Instance Tracking** page, the entries will be protected. Only the DHS Call Center, Child Care Help Desk, or W-2 Help Desk staff can:

- Delete an instance of noncooperation;
- Update the **Instance Effective Begin Date** field; and
- Update the **Sanction Begin Date** field.

Conversion from CARES Screen AISA

At conversion, all W-2 participants will start with zero instances of noncooperation. BWF will not carry-over prior noncooperation instances currently recorded on CARES screen AISA (Strike Assessment) because of the inconsistency and inaccuracy of the data. Additionally, agencies must not impose six-month sanctions based on noncooperation closures that occur prior to March 21, 2015.

REPORTS

To help agencies track timely actions on noncooperation alerts, W-2 eligibility determinations related to CS noncooperation, and approval of good cause claims, BWF is creating a new WebI report. This report will be available in August 2015 and BWF will announce its publication via the [Wisconsin Works Reports Notification Listserv](#).

TRAINING

A new training course, *Child Support Enhancements and Noncooperation*, will be available on the [PTS Learning Center](#) by March 21, 2015.

ACTION NEEDED

To prevent new LAB findings, W-2 agencies must ensure that FEPs act on noncooperation alerts within seven calendar days of receipt and end W-2 eligibility timely when individuals are not cooperating with CS and have not claimed good cause for noncooperation after being given seven working days to do so. With the enhancements made to CWW, FEPs must no longer use the manual [Request for Verification form \(DWSP-2303\)](#) when requesting information about CS good cause and must no longer use CARES screen AISA to track instances of CS noncooperation.

ATTACHMENTS

- Updated [W-2 Manual Section 15.4.1](#) *Requirements when CSAs Determine Noncooperation*
- Updated [W-2 Manual Section 15.5.1](#) *Noncooperation Exemption for Pregnant Women or Custodial Parents with Newborns*
- Updated [W-2 Manual Section 15.6](#) *Good Cause Claim for Noncooperation*
- Updated [W-2 Manual Section 15.7.3](#) *Determination that Good Cause Does Not Exist*

CONTACTS

BEPS CARES Information & Problem Resolution Center

For W-2 Policy Questions in the Balance of State: Bureau of Regional Operations, W-2 Regional Coordinators

For W-2 Policy Questions in Milwaukee: Milwaukee Operations Section Regional Administrators

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

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