

ATTACHMENT 2: W-2 TRAINING GUIDANCE, AGENCY ACTION, AND POLICY MANUAL UPDATES

Training

The following W-2 training resources will be updated to reflect the content of this memo and are available on the [Partner Training Team Learning Center](#) website:

- CWW Application Entry – Desk Aid
- Practical Applications in CWW

W-2 Agency Action

W-2 agencies must familiarize staff with the policy and CWW system changes and update any relevant standard operating procedures.

W-2 POLICY MANUAL UPDATES

2.4.1.1 SAVE

SAVE is the system used to verify an applicant's immigration status. To acquire access to the SAVE system, W-2 workers must submit the [CARES Automated Systems Access Request \(F-00476\) form](#) to the CARES Security staff. Not all FEPs are allowed access to the SAVE system.

Users can access SAVE via the [Immigrant/Refugee Information](#) page in CWW or is found at the following website: <https://save.uscis.gov/Web/vislogin.aspx?JS=YES>. The manual for using this system and for verifying alien status is located at: https://prd.cares.wisconsin.gov/help/ph/process_help/h82/82.htm.

2.7.1 Providing Social Security Numbers

Every member of the W-2 Group, including newborns, must provide a Social Security Number (SSN), or provide proof that any W-2 Group member without an SSN has applied for one, unless the individual is initially exempt. An individual is initially exempt if he or she does not have an SSN, does not have a work authorization, and is a member of one of the following qualified non-citizen groups:

- Cuban/Haitian entrants, as defined in section 501(e) of the Refugee Education Assistance Act of 1980; or
- Certified, foreign-born victims of trafficking; or
- Parolees (alien paroled into the U.S. for at least one year under section 212(d)(5) of the Immigration and Nationality Act);
- Certain battered aliens who meet the requirements of 8 U.S.C. s. 1641(c); or

- Any qualified non-citizen (see [2.4.2](#)) who cannot apply for an SSN until his or her immigration status paperwork has been revised.

An individual who is initially exempt must continue to complete the necessary steps for obtaining an SSN in order to remain eligible for W-2. W-2 agencies must assist the individual with these steps if the individual requires assistance. (See [4.1.3](#))

See [4.1.2](#) for suggested sources of allowable verification.

Once an SSN application date is verified, the individual has at least 6 full calendar months from the SSN application date to provide the SSN. The SSN must be provided by the end of the 13th full calendar month after the month of the SSN application date.

The FEP may collect the SSN at any point beginning in the 7th full calendar month and ending in the 13th full calendar month. This policy aligns with Health Care and FoodShare policy. To support the policy of all three programs, CWW will prompt the FEP or IM worker to collect the SSN anytime the FEP or IM worker completes an Intake, Review/Renewal, or Program Add beginning in the 7th full calendar month and ending in the 13th full calendar month.

Note: The timeframe described above also applies to individuals who are initially exempt. For initially exempt individuals, the individual has at least 6 full calendar months from the W-2 Initial Exemption Date in CWW to provide the SSN. The SSN must be provided by the end of the 13th full calendar month after the month of the W-2 Initial Exemption Date in CWW.

Example 1: Moira applies for W-2 in January 2019. The IM worker previously verified that her son Johnny's SSN application date is February 10, 2018. Because the SSN application date is **more than** 6 full calendar months in the past at the time of the W-2 Intake, CWW will prompt the FEP to pend for or enter Johnny's SSN.

Example 2: Moira applies for W-2 in January 2019. The IM worker previously verified that her son Johnny's SSN application date is August 10, 2018. Because the SSN application date is **less than** 6 full calendar months in the past at the time of the W-2 Intake, CWW will not prompt the FEP to pend for or enter Johnny's SSN.

At the June 2019 W-2 review, the SSN application date will be **more than** 6 full calendar months in the past. Therefore, CWW will prompt the FEP to pend for or enter Johnny's SSN.

Example 3: Moira applies for W-2 in January 2019. The IM worker previously verified that her son Johnny's SSN application date is August 10, 2018. Because the SSN application date is **less than** 6 full calendar months in the past at the time of the W-2 Intake, CWW will not prompt the FEP to pend for or enter Johnny's SSN.

In March 2019, the IM worker completes an IM renewal. Because Johnny's SSN application date is **more than** 6 full calendar months in the past at the time of the IM renewal, CWW will prompt the IM worker to pend for or enter Johnny's SSN.

Example 4: Moira applies for W-2 in January 2019. The IM worker previously verified that her son Johnny's SSN application date is August 10, 2018. Because the SSN application date is **less than** 6 full calendar months in the past at the time of the W-2 Intake, CWW will not prompt the FEP to pend for or enter Johnny's SSN.

However, Moira informs the FEP that Johnny received his SSN. The FEP enters Johnny's SSN into CWW and the SOLQ-I data exchange verifies Johnny's SSN. The requirement that all individuals in the W-2 Group must provide a SSN has been met.

Example 5: Moira applies for W-2 in January 2019. The IM worker previously verified that her son Johnny's SSN application date is November 10, 2018. Because the SSN application date is **less than** 6 full calendar months in the past at the time of the W-2 Intake, CWW will not prompt the FEP to pend for or enter Johnny's SSN.

Moira loses W-2 eligibility in April 2019. In June 2019, Moira reapplies for W-2. Because Johnny's SSN application date is now **more than** 6 full calendar months in the past, CWW will prompt the FEP to pend for or enter Johnny's SSN.

Note: Because a W-2 eligibility review is required every 6 months, the latest that CWW would prompt the FEP to pend for or enter the SSN is the 12th calendar month after the SSN application date or the W-2 Initial Exemption Date in CWW. Therefore, the latest possible verification deadline would occur in the 13th calendar month after the SSN application date or the W-2 Initial Exemption Date in CWW. Because any driver flow initiated by any worker will prompt the worker to pend for or enter the SSN when the SSN application date is more than 6 full calendar months in the past, it will be rare that the 13 month duration is reached.

If the W-2 agency determines that a W-2 Group member has refused to provide or apply for an SSN, the entire W-2 Group is ineligible for W-2.

W-2 agencies must only use SSNs and personally identifiable information for the direct administration of the program. Each time a FEP requests an SSN, the FEP must inform the individual that disclosure is mandatory for eligibility determination, how the agency will use the number, and under what statutory or other authority the agency is requesting the number. A sample statement follows:

Provision of your SSN or cooperation in applying for a SSN is required to determine eligibility for Wisconsin Works (W-2). The number you provide to the agency will be verified through a computer matching program to monitor compliance with program regulations and for program management. Wisconsin Statutes 49.145 (2)(k).

4.1.2 Information Requiring Eligibility Verification

Eligibility Criteria	Suggested Sources of Verification	ECF Code
<p>Identity (verify identity only for all adults in the W-2 Group and only once)</p>	<p>Driver's License</p> <p>State Issued ID Card</p> <p>Student ID Card</p> <p>US Government ID Card</p> <p>Military ID Card</p> <p>Native American ID Card or other tribal membership documentation issued by a Federally recognized tribe</p> <p>Any photo ID document issued by USCIS</p> <p>US Passport</p> <p><u>Enhanced driver's license</u></p> <p>Any unexpired immigration document</p> <p>Any other reliable document that verifies identity</p>	<p>ID</p>
	<p><u>DX (DATA EXCHANGE) code when entered by CARES in the Identity Verification field</u> Data exchange from the Social Security Administration for certain applicants as described in Operations Memo 10-75</p>	<p>Not applicable</p>

Eligibility Criteria	Suggested Sources of Verification	ECF Code
	<p>SC (SSI 1619b SSDI OR <u>MEDICARE SSI MA or Medicare Recipient</u>) <u>code</u> when entered by an IM Worker in the Identity Verification or Identity MA Verification field. If the code is entered only in the Identity MA Verification field, the FEP will need to enter the code in the Identity Verification field.</p> <p><u>DE (DATA EXCHANGE) code</u> when entered by an IM Worker in the Identity Verification or Identity MA Verification field. If the code is entered only in the Identity MA Verification field, the FEP will need to enter the code in the Identity Verification field.</p> <p><u>**SAVE database</u></p>	
<p>U.S. Citizenship (verify citizenship only once)</p>	<p>Certified copy of Birth Certificate (must be marked “For Administrative Use”)</p> <p><u>Baptismal Certificate or other religious record that lists a U.S. place of birth if place of birth is shown</u></p> <p><u>Hospital Birth Record or other medical birth record that lists a U.S. place of birth</u></p> <p>Native American ID Card or other tribal membership documentation issued by a Federally recognized tribe</p>	ID

Eligibility Criteria	Suggested Sources of Verification	ECF Code
	<p>Certificate of Naturalization (should be marked "For Administrative Use")</p> <p>Certificate of Citizenship (should be marked "For Administrative Use")</p> <p><u>U.S. Passport</u></p> <p><u>Enhanced driver's license</u></p> <p><u>Citizenship documents issued by the U.S. Department of State to U.S. citizens born abroad</u></p> <p><u>Final adoption decree that lists a U.S. place of birth</u></p> <p><u>U.S. Citizen ID Card or Northern Mariana Card</u></p>	
	<p><u>DX (DATA EXCHANGE) code when entered by CARES in the US Citizenship Verification field</u> Data exchange from the Social Security Administration for certain applicants as described in Operations Memo 10-75</p> <p>**CARES birth query (Wisconsin Births only)</p> <p><u>**SAVE database</u></p>	Not applicable

Eligibility Criteria	Suggested Sources of Verification	ECF Code
	<p>SC (SSI MA or Medicare Recipient) or MB (<u>MEDICAID BIRTH CLAIM</u> Medicaid Birth Claim) code when entered by the an IM Worker in the <u>US Citizenship Verification</u> or <u>US Citizenship MA Verification</u> field. If the code is entered only in the <u>US Citizenship MA Verification</u> field, the FEP will need to enter the code in the <u>US Citizenship Verification</u> field.</p> <p><u>NX (CONTINUOUSLY ELIGIBLE NEWBORN)</u> code when entered by CARES in the <u>US Citizenship Verification</u> field</p> <p><u>NB (CONTINUOUSLY ELIGIBLE NEWBORN)</u> code when entered by an IM Worker in the <u>US Citizenship Verification</u> or <u>US Citizenship MA Verification</u> field. If the code is entered only in the <u>US Citizenship MA Verification</u> field, the FEP will need to enter the code in the <u>US Citizenship Verification</u> field.</p> <p><u>DE (DATA EXCHANGE)</u> code when entered by an IM Worker in the <u>US Citizenship Verification</u> or <u>US Citizenship MA Verification</u> field. If the code is entered only in the <u>US Citizenship MA Verification</u> field, the FEP will need to enter the code in the <u>US Citizenship Verification</u> field.</p>	

Appendix - Non-Citizen Eligibility Documentation

In order to determine whether or not a non- U.S. citizen applicant is eligible for Wisconsin Works (W-2) you must obtain information regarding the applicant’s immigration status.

Use or disclosure of information related to immigration status is restricted to persons and organizations directly connected with verification of immigration status for purposes of determining eligibility for program services.

A non-citizen individual is eligible for W-2 if his/her immigration status is one of those listed below.

STATUS and CARES Code	PROOF
Lawfully Admitted For Permanent Residence (LPR) CARES code 01	I-551 Permanent Resident card; or Temporary I-551 stamp in foreign passport or on I-94; or I-327 (Re-entry Permit); or I-181 Memorandum of Creation of Lawful Permanent Residence with appropriate stamp.
Asylee CARES code 05	I-94 Arrival/Departure card referencing §208 of the INA, “AS-1, AS-2, or AS-3”; or I-551 Permanent Resident card stamped “AS-6, AS-7, or AS-8”; or I-571 Refugee Travel Document*; or I-766 Employment Authorization Document annotated “A05”; or I-730 Approval Letter (may be used as proof of asylee status for derivatives); or Asylum approval letter from USCIS Asylum Office; or Order of an immigration judge granting asylum; or Written decision from the Board of Immigration Appeals (BIA). * The I-571 does not distinguish between refugees and asylees. An individual with an I-571 may be a refugee or an asylee.

STATUS and CARES Code	PROOF
Refugee CARES code 04	<p>I-94 Arrival/Departure card noting “Admitted under §207 of the INA,” “Refugee,” “RE-1, RE-2, RE-3, RE-4 or RE-5,” or I-94 with Visa 93 (V-93); or</p> <p>I-551 Permanent Resident card stamped “R8-6, RE-5, RE-6, RE-7, RE-8 or RE- 9,” or “SI6, SI7, SI9, SQ6, SQ7, or SQ9”; or</p> <p>I-571 Refugee Travel Document*; or</p> <p>I-730 Approval Letter (may be used as proof of refugee status for derivatives); or</p> <p>I-766 Employment Authorization Document annotated “A03”; or</p> <p>Iraqi or Afghan passport with immigrant visa stamp noting category “SI1, SI2, SI3, SQ1, SQ2 or SQ3.”</p> <p>* The I-571 does not distinguish between refugees and asylees. An individual with an I-571 may be a refugee or an asylee.</p>
Victim of Human Trafficking CARES code 19 or 21	<p>Certification letter, eligibility letter, or interim assistance letter issued by the U.S. Department of Health and Human Services, ACF Office on Trafficking in Persons (OTIP). If letter directs, must call phone number for verification; or</p> <p>I-94 Arrival/Departure card coded T1 or T2 stating admission under §212(d)(5) of the INS if status granted for at least one year.</p>
Parolee (for at least one year) CARES code 06	<p>I-94 Arrival/Departure card noting “Paroled pursuant to §212(d)(5)” or “parole” or “parole in place” (PIP) with date of entry and date of expiration indicating one year; or</p> <p>I-766 Employment Authorization Document annotated “C11” or “A4,” and I-94 indicating admitted for at least one year.</p>
Deportation or Removal Withheld CARES code 15	<p>I-766 Employment Authorization Document annotated “A10”; or</p> <p>Order of an immigration judge showing the date was withheld under §243(h) of the INA as in effect prior to April 1, 1997, or removal withheld under §241(b)(3) of INA.</p>

STATUS and CARES Code	PROOF
Cuban/Haitian Entrant CARES code 11	<p>I-94 Arrival/Departure card noting “Cuban/Haitian Entrant (status pending),” “Form I-589 filed,” or “CU7”; or I-94 Arrival/Departure card referencing parole under §212(d)(5) of INA or stamp showing parole in U.S. on or after 10/10/80 and reasonable evidence that parolee has been a National (citizen) of Cuba or Haiti¹; or I-551 Permanent Resident card stamped “CU6, CU7, or CH6”; or I-766 Employment Authorization Document annotated “A04,” “C08,” “C10,” or “C11”; or</p> <p>Reasonable evidence of Cuban or Haitian nationality (citizenship) and:</p> <ol style="list-style-type: none"> (1) Temporary I-551 stamp in foreign passport; or (2) USCIS notice or letter indicating ongoing pending, exclusion or deportation proceedings; or (3) USCIS letter indicating the individual has applied for asylum- receipt for filing Form I- 589. <p>1 Exception: this guideline does not apply when the individual was paroled solely to testify as a witness in a judicial, administrative or legislative proceeding or when the parolee is in legal custody pending criminal prosecution.</p>
North American Indian born in Canada CARES code 18	<p>I-551 Permanent Resident card stamped “S13;” temporary I-551 stamp in a Canadian passport; or I-94 Arrival/Departure card noting “S13”; or A letter or other tribal document certifying at least 50% American Indian blood as required by §289 of INA; or School records; or A birth or baptismal certificate issued on a reservation, or other satisfactory evidence of birth in Canada.</p>
Member of federally-recognized tribe born outside U.S. CARES code 18	<p>Membership card or other tribal document demonstrating membership in a federally- recognized Indian tribe under §4(e) of the Indian Self-Determination and Education Assistance Act.</p>
A U.S. citizen’s or LPR’s battered spouse or child, or parent or child of such person, who obtains “Notice of Prima Facie Case from USCIS” or is found prima facie eligible under the Violence Against Women Act (VAW A) CARES code 16	<p>I-797 Notice of Action indicating approved, pending, or prima facie determination of I-360 (Self-petition by spouse or child of abusive U.S. citizen or LPR) under §204(a)(1)(B)I(i) or (iii); or I-797 Notice of Action indicating approved or pending I-130 (Petition for Alien Relative) under §204(a)(1)A(i) or (ii) or §204(a)(1)(B)(i); or Order from EOIR granting suspension of deportation under §244(a)(3) or cancellation of removal under §240A(b)(2).</p>

STATUS and CARES Code	PROOF
Conditional Entrant (status granted to refugees before 1980) CARES code 03	I-94 Arrival/Departure card with stamp showing admitted under §203(a)(7) of INA; or I-766 Employment Authorization Document annotated “A01” or “A03”
Amerasian Immigrant CARES code 17	I-94 Arrival/Departure card noting “AM-1, AM-2, or AM-3.” Derive date of entry from inspection on stamp; if date is missing, obtain from I-551 or from USCIS; or I-551 Permanent Resident card stamped “AM-6, AM-7, or AM-8”; or Vietnamese exit visa, Vietnamese passport or U.S. passport with codes “AM-1, AM-2 or AM-3.”
<u>Lawfully residing</u> <u>CARES code 20</u> Veteran, spouse, unmarried surviving spouse and unmarried dependent child of a U.S. veteran who fulfilled a minimum active duty requirement of 2 years	A discharge Certificate (DD Form 214) that states “Honorable.” A character discharge “Under Honorable Conditions” is an “Honorable Discharge” for alien status purposes. Narrative Reason for separation block must not state that discharge is for reason of “alienage” or lack of U.S. citizenship.
<u>Lawfully residing</u> <u>CARES code 20</u> Active Military: active duty or a member of the Armed Forces on full-time duty in the Army, Navy, Air Force, Marine Corps or Coast Guard, spouse and children	Military Identification Card (DD Form 2) (Active) that lists an expiration date not more than one year from the determination date. If card is due to expire within one year from the date of the determination, use a copy of the current military orders.