

# **FoodShare Employment and Training Handbook Release 20-03**

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# **1 FSET PROGRAM OVERVIEW**

## **1.1 FSET Program Description**

The FoodShare Employment and Training (FSET) program is Wisconsin's employment and training program operated as part of the federal Supplemental Nutrition Assistance Program (SNAP), known as FoodShare in Wisconsin. The Wisconsin Department of Health Services (DHS) administers FoodShare and FSET. Wisconsin has been recognized nationally for offering a voluntary FSET program with superior services and outstanding results.

The purpose of FSET is to provide FoodShare members with opportunities to gain skills, training, and experience needed to improve employment prospects and reduce reliance on FoodShare benefits. Wisconsin's FSET program focuses on identifying the strengths, needs, and preferences of job seekers to provide comprehensive, individualized services that will result in successful competitive employment. FSET also offers FoodShare members a way to meet the work requirements. See the FoodShare Handbook 3.16.1 Work Requirements and 3.17.1 Able-Bodied Adults without Dependents for more information on work requirements.

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## **1.3 FSET Program Delivery in Wisconsin**

### **1.3.1 FSET Administrative Regions**

Wisconsin is divided into eleven FSET administrative regions, which mirror the boundaries of Wisconsin's Workforce Development Areas (WDA). Each FSET region administers and delivers FSET services within the region by partnering with local service providers and community organizations. Wisconsin's FSET regions include:

- FSET Region 1 – Southeast: Kenosha, Racine, and Walworth Counties
- FSET Region 2 – Milwaukee: Milwaukee County
- FSET Region 3 – WOW: Ozaukee, Washington, and Waukesha Counties
- FSET Region 4 – Fox Valley: Calumet, Fond du Lac, Green Lake, Waupaca, Waushara, and Winnebago Counties
- FSET Region 5 – Bay Area: Brown, Door, Florence, Kewaunee, Manitowoc, Marinette, Menominee, Oconto, Outagamie, Shawano, and Sheboygan Counties
- FSET Region 6 – North Central: Adams, Forest, Langlade, Lincoln, Marathon, Oneida, Portage, Vilas, and Wood Counties
- FSET Region 7 – Northwest: Ashland, Bayfield, Burnett, Douglas, Iron, Price, Rusk, Sawyer, Taylor, and Washburn Counties
- FSET Region 8 – West Central: Barron, Chippewa, Clark, Dunn, Eau Claire, Pepin, Pierce, Polk, and St. Croix Counties
- FSET Region 9 – Western: Buffalo, Crawford, Jackson, Juneau, La Crosse, Monroe, Trempealeau, and Vernon Counties
- FSET Region 10 – South Central: Columbia, Dane, Dodge, Jefferson, Marquette, and Sauk Counties
- FSET Region 11 – Southwest: Grant, Green, Iowa, Lafayette, Richland, and Rock Counties

In addition, eight Wisconsin tribes operate their own independent tribal FSET program, including:

- Bad River Band of Lake Superior Tribe of Chippewa Indians
- Lac du Flambeau Band of Lake Superior Tribe of Chippewa Indians
- Menominee Indian Tribe of Wisconsin
- Oneida Tribe of Indians of Wisconsin
- Forest County Potawatomi Community
- Red Cliff Band of Lake Superior Chippewa
- Sokaogon Chippewa Community
- Stockbridge-Munsee Community

### **1.3.2 Voluntary FSET Program**

Since 2008, Wisconsin has operated a voluntary FSET program, an allowable state option under federal SNAP regulations. The shift to a voluntary FSET program was a provision of Wisconsin's 2007-2009 biennial budget.

A voluntary FSET program means that an **ABAWD** may choose to meet the ABAWD work requirement through participation in FSET. See the FoodShare Handbook 3.17.1.7 ABAWD Work Requirement for the complete list of ways that ABAWDs may meet the ABAWD work requirement. ABAWD eligibility for FoodShare is limited to three months of **TLB** in a 36-month period if an ABAWD is not meeting the ABAWD work requirement and does not have a qualifying exemption. The three TLB months do not have to be consecutive.

Non-ABAWDs and ABAWDs meeting the work requirement may also choose to participate in FSET. See the FoodShare Handbook 3.17.1 Able-Bodied Adults without Dependents for more information on the ABAWD work requirement and ABAWD status determination.

A voluntary FSET program also means that FoodShare work registrants are not required to participate in FSET in order to meet the work registration requirements. See the FoodShare Handbook 3.16.1 Work Requirements for more information on the FoodShare work registration requirements.

### 1.3.3 Service Delivery to ABAWDs

The Personal Responsibility and Work Opportunity Reconciliation Act of 1996 (PRWORA) limits the receipt of FoodShare benefits to three full months in a 36-month time period for ABAWDs who do not meet the work requirement or meet an exemption from the work requirement.

From 2002 through 2014, the State of Wisconsin was granted approval from the federal Food and Nutrition Service (FNS) to waive the federal time limit on FoodShare benefits for ABAWDs who failed to meet ABAWD work requirements. As specified in the Wisconsin 2013-2015 biennial budget, the state implemented the federal time limit on FoodShare benefits for ABAWDs statewide effective April 1, 2015. For more information about ABAWD TLBs and the 36-month period, see the FoodShare Handbook 3.17.1 Able-Bodied Adults without Dependents.

During a 36-month period, an ABAWD may continue receiving FoodShare benefits as long as the ABAWD is meeting the work requirement or is later determined to be a non-ABAWD. Participating in the FSET program is one way for ABAWDs to meet the work requirement and maintain ongoing eligibility for FoodShare. Once FoodShare eligibility is confirmed, an ABAWD is systematically referred to FSET, so that he or she has the opportunity to choose to participate, as soon as possible, and not exhaust his or her time-limited benefit months.



In order to meet the work requirement through FSET participation, ABAWDs must participate in 'qualifying' activities. FSET agencies are required to provide qualifying services so that all ABAWDs who enroll in FSET are able to meet the work requirement by participating in FSET, if they choose.

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## **1.4 FSET Component Activities**

The Food and Nutrition Service (FNS) structures the SNAP employment and training program into components including supervised job search, job search training, workfare, work experience, education, self-employment, and job retention. Wisconsin's FSET components also include formal assessment and on-the-job training. FSET workers assign participants to program activities that fall within one of the program components.

FSET activities are classified as qualifying and non-qualifying activities. In order to meet the ABAWD work requirement through FSET participation, ABAWDs must participate in qualifying activities for at least half of their total required hours. FSET agencies are required to provide qualifying activities so that all ABAWDs who enroll in FSET are able to meet the work requirement by participating in FSET, if they choose. FSET workers must not assign ABAWDs to non-qualifying activities for more than half of their total required hours.

Employment search, which falls within the supervised job search component, is a non-qualifying activity. Enrollment and orientation do not fall within any of the components and are also non-qualifying activities. All other component activities are qualifying activities.

FSET agencies must offer a variety of activities in order to comprehensively address the unique needs of each participant. See FSET Handbook 10.3 Appendix C: FSET Fundable Component Activities for a complete list of FSET fundable activities.

### **1.4.1 Supervised Job Search and Job Search Training**

The supervised job search and job search training components are for participants engaged in employment search and participants who need general guidance with the job search process. Agencies assist job search and job search training participants in developing, practicing, and applying job seeking skills with the goal of securing employment. This includes:

- Assistance with applications and resume development
- Interviewing skills, including mock interviewing
- Labor market information
- Employability assessments
- Job leads and job referrals
- Job development and job placement, as needed

Supervised job search:

- Occurs at State approved locations.
- Involves participant activities being supervised, and is tracked in accordance with guidelines issued by the State.

- The activities under the supervised job search component include supervised employment search and workfare job search.
- Supervised employment search is a non-qualifying activity.
- Workfare job search is a qualifying activity that may be assigned to workfare participants in the first 30-days of a workfare placement.
  - ABAWDs who are employed should not be assigned to workfare job search.
  - Non-ABAWDs should not be assigned to workfare job search.
  - See FSET Handbook 1.4.3 Workfare for more information on assigning participants to workfare.

**Note:** Job Search activities that precede a workfare assignment are considered part of the workfare component and do not have to be supervised.

FSET workers may only assign an ABAWD participant to employment search and other non-qualifying activities for less than half of the total required hours, in total. However, supervised job search and job search training activities are considered qualifying activities when offered as a part of workfare or through an allowable work program. See FSET Handbook 6.4 Co-Enrollment in FSET and Another Allowable Work Program and 10.5 Appendix E: Qualifying Work Programs for ABAWDs for more information on qualifying work programs for ABAWDs.

FSET workers must reassess assignment to activities within supervised job search and job search training during regular employment plan reviews in accordance with FSET Handbook 8.1 Employment Plan Reviews. During employment plan reviews FSET workers should discuss with participants whether participation in assessment, training, or education activities would help the participant better achieve employment goals.

## 1.4.2 Education

All activities within the education component are qualifying activities. Educational activities must have a direct link to employment.

Allowable activities within the education component include:

- Adult Basic Education (ABE)
- Driver's Education
- Customized Skills Training
- English as a Second Language
- General Educational Development
- High School Equivalency Diploma
- Higher Education - Full-time Student
- Higher Education - Part-time Student
- Job Skills Training
- Job Readiness/Motivation

- Literacy Skills
- Post-secondary Education (2 years or less)
- Regular School (K-12)
- Vocational Adult Basic Education
- Vocational English as a Second Language
- Vocational Literacy

See FSET Handbook 10.3 Appendix C: FSET Fundable Component Activities for a full description of the activities listed above.

FSET agencies are encouraged to work with local employers to design customized job skills training programs based on the skill needs of employers in the local labor market. This includes partnering with technical colleges to offer certified qualifying training programs.

The following factors are critical in determining whether FSET funding may be used to fund an educational activity:

- The educational activity must be on the participant's employment plan;
- FSET funding cannot be used to replace funds for existing services;
- Charges for FSET students cannot exceed the cost applied to non-FSET students for the same service; and
- A FoodShare member who is an eligible student already attending the institution (without benefit of FSET participation) is exempt from FoodShare work requirements. While the student may volunteer to participate in another FSET activity, his or her education costs are already being met, and it is not appropriate to use federal funds to subsidize those expenses.

### 1.4.3 Workfare

Workfare is the only activity within the workfare component. Workfare is a qualifying activity for ABAWDs who need to develop the basic skills and/or work history necessary to enter the job market successfully. Non-ABAWDs and employed ABAWDs should not be assigned to workfare.

Workfare provides participants the opportunity to learn new job skills and establish work references. The primary goal of workfare is to improve employability and encourage individuals to move into regular employment while returning something of value to the community. Workfare assignments may not replace or prevent regular employment and must provide the same benefits and working conditions provided to regular employees performing comparable work for comparable hours.

Workfare is a household-level component. Required hours of participation for a household are determined by dividing the household's monthly FoodShare allotment by the state or federal minimum wage, whichever is higher. FSET agencies cannot allow participants to volunteer in workfare beyond that maximum. See the FSET Handbook

#### 6.3.2.4 Determining Required Hours of Participation for more information on determining required hours of participation for workfare.

Prior to assigning a participant to a workfare site, the FSET agency must establish a formal relationship with the employer. Workfare sites may be established with public or private non-profit employers, including:

- Work sites with easily expandable work crews. These types of positions typically require little training, are not greatly disrupted by unplanned absences, and have easily expanded or contracted functions depending upon the need for positions.
  - Examples include: housing authorities, parks and recreation, and sanitation departments.
- Work sites available through non-profit community organizations in the human services field.
  - Examples include: community non-profits, religious organizations, hospitals, schools, and government agencies.

Workfare placements are unpaid opportunities for FSET participants. Subsidizing participant wages with FSET funds is not allowable under any circumstances.

### **1.4.4 Work Experience**

Allowable activities under the work experience component include: FSET work experience, community service, transitional employment (co-enrollment), W-2 (co-enrollment), and trial job (co-enrollment). These are qualifying activities that offer the opportunity for job shadowing or short-term placement in a work or training setting. The benefits of work experience include exposing participants to a variety of job options, improving employability, and helping ease the participant's transition into regular employment.

ABAWDs participating in work experience must meet the 80-hour per month work requirement. ABAWDs enrolled in work experience may meet the work requirement by voluntarily participating in work experience for 80 hours per month, or by participating in work experience in combination with other qualifying activities for a combined total of 80 hours per month. The calculation used to determine workfare participation hours for ABAWDs cannot be used for work experience.

Prior to assigning a participant to a work experience site, the FSET agency must establish a formal relationship with the employer. Work experience sites can include placement with private, for-profit companies, public non-profit employers, and private non-profit employers. Work experience assignments may not replace or prevent regular employment and must provide the same benefits and working conditions provided to regular employees performing comparable work for comparable hours. FSET agencies must monitor the quality of work experience sites to ensure they provide participants with adequate experience and skills.

### **1.4.5 Self-Employment**

The only activity within the self-employment component is self-employment. It is a qualifying activity in which FSET participants receive technical assistance for designing and operating their own business. This includes a new business as well as an existing business.

Individualized technical assistance is provided in the following areas:

- Creating a business plan to develop a small business
- Conducting feasibility studies to determine viability of the product or service
- Locating financial resources, including low cost loans and grants
- Developing successful marketing strategies to start a business or expand an existing business
- Resolving credit problems
- Navigating state and federal regulations

### 1.4.6 Job Retention

The only activity under the job retention component is job retention. It is a qualifying activity that provides services for a minimum of 30 days and no more than 90 days to participants who have secured employment.

A good faith effort must be made to provide at least 30 days of job retention services to FSET participants enrolled in the job retention component. Good faith efforts may include informing participants in the job retention component of the 30-day minimum and developing a job retention case management plan that extends at least 30 days.

Both of the following must be true in order for an individual to participate in job retention:

- The individual was enrolled in FSET prior to obtaining employment; and
- The individual received FoodShare benefits the month of or the month prior to when job retention services would begin.

The criteria above must be met each time the job retention component is assigned. The start date of the job retention activity assignment must be on the day that job retention is accepted by the participant or the start date of the employment, whichever is later.

An individual, who received job retention services for employment and then obtained new employment, may be eligible for additional job retention services, if the individual participated in an FSET component in addition to job retention prior to gaining the new employment.

**Example:** Sheena participates in employment search, gains employment, and receives 90 days of job retention services. Sheena later participates in employment search and job skills training to find a better job. Sheena obtains another job and qualifies for an additional 90 days of job retention services.

There is no limit on the number of times an individual may receive job retention services if the individual participated in FSET activities, other than job retention, prior to obtaining the new employment.

Job retention includes:

- Job retention reimbursement for reasonable and necessary expenses to assist individuals in maintaining employment; and
- Case management services that address workplace demands and employer expectations.

Individuals receiving job retention services usually will not continue to participate in other FSET components, but they may choose to continue participation. In some cases individuals may become FoodShare ineligible while enrolled in job retention services. Job retention services may continue after an individual becomes FoodShare ineligible as long as the individual became ineligible for a reason other than an intentional program violation or failure to comply with FoodShare work requirements without good cause. If an individual obtains employment but continues to participate in other allowable FSET components, he or she is eligible to receive supportive services if reasonable, necessary, and directly related to participation in the FSET components. For more information on supportive services, see FSET Handbook Chapter 5.0 Supportive Services.

See FSET Handbook Section 6.5.1 for more information on recording monthly participation in job retention.

#### **1.4.7 Formal Assessment**

Formal assessment is intended for FSET participants exploring their career interests and advancement opportunities. Activities within the formal assessment component are qualifying activities. They include:

- Occupational testing
- Career planning
- Career advancement

#### **1.4.8 On-the-Job Training**

The only activity under the on-the-job training component is on-the-job training. It is a qualifying activity and may be assigned when a participant is in a paid job subsidized by a program other than W-2 including:

- Workforce Innovation and Opportunity Act (WIOA) on-the-job training
- Division of Vocational Rehabilitation (DVR) work experience
- Economic Dislocation and Worker's Adjustment Assistance Act (EDWAA) on-the-job training
- Adult Apprenticeship

## 1 FSET Program Overview

- Employment subsidized by Green Thumb, Senior Aides Older Worker Program, the Wisconsin Youth Conservation Corps (YCC), and Volunteers in Service to America (VISTA) workers.

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## 2 FSET AND FOODSHARE ELIGIBILITY

### 2.1 FSET and FoodShare Eligibility

All individuals who are over the age of 16 and eligible for FoodShare benefits are eligible to participate in FSET.

The income maintenance (IM) agency is responsible for taking the following actions relating to FoodShare eligibility:

- **Determine FoodShare Eligibility and ABAWD Status**

IM workers are responsible for determining FoodShare eligibility, determining ABAWD status, and referring FoodShare members to the FSET program. ABAWDs may choose to meet the ABAWD work requirement through participation in FSET. Non-ABAWDs may participate in FSET, but do not need to meet the ABAWD work requirement. See the FSET Handbook 6.3 FSET Participation Requirements for more information on ABAWD status and FSET participation.

- **Determine Exemptions from the ABAWD Work Requirement**

IM workers have primary responsibility for determining and verifying ABAWD exemptions. However, FSET workers must understand ABAWD exemptions and be aware of changes in participants' ABAWD exemptions. FSET workers may identify that an individual qualifies for an ABAWD exemption once they begin working with a participant. When an ABAWD exemption is identified, the FSET worker must notify the IM agency of the exemption and work with the participant to initiate the process of verifying the exemption.

For more information on exemptions from the ABAWD work requirement, see the FSET Handbook 6.2.1 Non-ABAWD.

- **Provide FSET Information to FoodShare Applicants and Members**

IM workers are responsible for providing information about the FSET program to all FoodShare applicants and members during the FoodShare interview process at application and renewal, including:

- Explaining the benefits of the FSET program including a brief overview of the available employment and training opportunities and supportive services.
- Explaining how the FSET program can help an ABAWD meet the monthly ABAWD work requirement, in order to maintain ongoing FoodShare benefits.
- Asking ABAWDs meeting the work requirement and non-ABAWDs if they would like to be referred to the FSET program.

## 2 FSET and FoodShare Eligibility

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## 3 FSET REFERRALS

### 3.1 Overview of Referrals

Some FSET referrals are generated by the **CWW** system after FoodShare eligibility is run and confirmed by an income maintenance (IM) worker. The 'Refer to FSET' page in CWW sends both new referrals and updates to existing referrals that the FSET agency already received. All FSET referrals are sent to the FSET Tool in CWW. FSET workers may also refer FoodShare eligible individuals to the FSET program via the Individual Summary page within CWW.

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### 3.2 FSET Referral Process

An individual can be assigned one of the following four FSET referral statuses:

- **Referred:** A new FSET referral is in 'referred' status from the time it is initially sent by the IM agency through the time in which the FSET worker takes action to enroll the participant using the FSET Tool or the referral is withdrawn. During the 'referred' status period, the FSET worker initiates contact and schedules the initial enrollment appointment. See the FSET Handbook 3.5 Initial Contact, Appointment Scheduling, and Notification for the requirements for contacting and scheduling participants.
- **Enrolled:** Once an individual is enrolled, the referral will stay in enrolled status until the individual is disenrolled from FSET. See the FSET Handbook 4.1 FSET Enrollment Process.
- **Disenrolled:** An FSET referral changes to 'disenrolled' status when the FSET worker selects the disenroll option on the Participant Summary page. An individual can only be disenrolled from FSET if he or she is currently in 'enrolled' status. For more information see the FSET Handbook 8.5 Disenrollment.
- **Withdrawn:** Referrals can only be withdrawn under certain circumstances. Only referrals in 'referred' status can be withdrawn from the Participant Summary page. See the FSET Handbook 3.6 Withdrawing a Referral for requirements for withdrawing a referral.

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### 3.3 New Referrals

A new referral is systematically generated when a FoodShare member is determined to be an ABAWD who is not meeting the work requirement outside of FSET. This is called a TLB (time-limited benefit) referral. Individuals with a TLB referral will only exhaust a TLB in months when the work requirement is not met. A new referral is also generated when a non-ABAWD or an ABAWD who is meeting the work requirement outside of FSET requests a referral to be sent. This is called a non-TLB referral. ABAWDs with a non-TLB referral will exhaust a TLB if they stop meeting the ABAWD work requirement.

**CWW** is designed to send new FSET referrals from IM workers to the FSET Tool when an IM worker confirms eligibility and processes the referral. As a result, a new referral may be sent to the FSET agency prior to or after the FoodShare eligibility start date. Only FoodShare eligible individuals can participate in FSET. FSET agencies must carefully monitor referrals for the effective date of FoodShare eligibility. FSET agencies must not enroll or begin providing FSET services to participants prior to the date in which the individual is eligible for FoodShare.

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### 3.4 Referral Updates

A referral update is generated for referred individuals who have a change. This notifies the FSET agencies when the income maintenance (IM) agency re-determines eligibility and one of the following changes have occurred for a FoodShare member who is currently referred to or enrolled in FSET:

- Has a change in ABAWD status
- Relocates to a different FSET region
- Becomes ineligible for FoodShare

For referral updates, the effective date is the date on which the change is applicable.

**Note:** FoodShare eligibility and FSET referral statuses are impacted by the timing of FoodShare eligibility processing initiated by the Income Maintenance (IM) agency and CWW.

**Example:** A change is entered in CWW in September.

If FoodShare eligibility is run with dates in September, the change is applied to September forward.

If FoodShare eligibility is run before adverse action in September, the change is applied to October forward.

If FoodShare eligibility is run after adverse action in September, the change is applied to November.

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## 3.5 Contacting the Participant

### 3.5.1 Initial Contact, Appointment Scheduling, and Notification

The FSET worker is expected to contact the referred FoodShare member by letter or by telephone within five business days of the FSET referral. The five business days start the day after the FSET referral date. As part of the initial contact, the FSET worker must attempt to schedule an initial appointment for FSET enrollment and orientation. If the FSET agency reaches the referred member by phone, the FSET agency should share with the member an estimate of the duration of the enrollment and orientation appointment. If the FSET worker attempts, but is unsuccessful in making initial contact by phone, the FSET worker is responsible for sending an appointment letter within five business days of the FSET referral.

The FSET worker must schedule the initial appointment for FSET enrollment and orientation to occur within 10 business days of either the FSET referral or the FoodShare eligibility effective date, if the referral is sent prior to the FoodShare eligibility effective date. The 10 business days start the day after the FSET referral date or the FoodShare eligibility effective date, whichever is later.

For referrals in which the effective date of FoodShare eligibility is on or before the date the referral was received:

- The FSET worker must contact the member within five business days of the referral date.
- If the FSET worker tries to contact the individual by phone but is unable to reach the individual, the FSET worker must send an appointment letter within 5 business days of the FSET referral.
- The FSET worker must schedule the initial appointment so that it occurs within 10 business days of the referral date.

**Note:** For appointments scheduled to occur within 12 calendar days of the current date, **CWW** will automatically send the FSET appointment letter the day after the FSET worker schedules the appointment. For appointments scheduled to occur greater than 12 calendar days of the current date, CWW will send the FSET appointment letter 12 days prior to the appointment.

**Example 1:** On 10/07/2019, a TLB referral is received for an ABAWD with a FoodShare effective date of 10/01/2019. The FSET worker calls the member on 10/08/2019 and schedules an enrollment appointment for 10/14/2019. CWW will automatically send an appointment letter on 10/09/2019 for the scheduled appointment on 10/14/2019. The worker contacted the member within the five business day time frame, which expires on 10/14/2019. The worker also scheduled the appointment within the 10 business day time frame, which expires on 10/21/2019.

**Example 2:** On 10/07/2019, a TLB referral is received for an ABAWD with a FoodShare effective date of 10/01/2019. The FSET worker is unable to reach the member by phone on 10/08/2019 and 10/10/2019. On 10/10/2019 the worker schedules the initial enrollment appointment for 10/19/2019 so that the member receives the appointment letter prior to the date of the appointment. The appointment letter will automatically be sent on 10/11/2019. The worker contacted the member within the five business day time frame, which expires on 10/14/2019. The worker also scheduled the appointment within the 10 business day time frame, which expires on 10/21/2019.

For referrals in which the 'Effective Date' of FoodShare eligibility is after the date the referral was received:

- The FSET worker must contact the member within five business days of the referral date.
- The initial appointment must be scheduled to occur within 10 business days of the FoodShare eligibility effective date.

**Example 3:** On 10/07/2019, a TLB referral is received for an ABAWD with a FoodShare effective date of 11/01/2019. The FSET worker calls the member on 10/09/2019 and schedules an enrollment appointment for 11/04/2019 (the member is ineligible for FoodShare in October and so cannot begin participating in FSET until November 1). The worker complied with the five business day requirement, which expires on 10/14/2019. The worker also complied with the 10 business day requirement, which expires on 11/15/2019. CWW will automatically send an appointment letter 12 days prior to the date of the enrollment appointment.

If a member misses their initial appointment, the FSET worker must schedule a second appointment. The second appointment must be scheduled to occur within 10 business days of the initially scheduled missed appointment.

For more information about appointment correspondence, see Process Help 1.8.9 Client Scheduling – Appointment Correspondence.

### 3.5.2 Number of Contacts

At a minimum, FSET workers must schedule a second appointment for individuals who miss their initial appointment.

The Department of Health Services strongly encourages FSET agencies to continue scheduling additional appointments beyond the required two appointments for ABAWDs who fail to attend these scheduled appointments.

Other than multiple attempts to schedule enrollment and orientation, which may be documented under one PIN comment, the FSET worker should document in PIN comments information relating to each contact that is attempted.

See FSET Handbook 4.6 PIN Comments for detailed policy requirements regarding PIN commenting.

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### 3.6 Withdrawing a Referral

Under certain circumstances, an FSET referral may be withdrawn prior to FSET enrollment. Only those that are in 'referred' status can be withdrawn. An FSET referral may be withdrawn by the end of the month if one of the following applies:

- An updated referral from the income maintenance (IM) worker is received indicating that the individual's ABAWD status has changed to 'FoodShare Ineligible'.
- An updated referral from the IM worker is received indicating that an ABAWD's status has changed to 'Non-ABAWD' or to an ABAWD with a non-TLB referral status. In these cases, the referral may only be withdrawn if two additional conditions are met, as follows:
  - The FSET worker has not yet contacted the member by phone or mail to schedule the initial appointment and
  - The member has not indicated to the IM worker that they want to participate in FSET.
- A non-ABAWD or or an ABAWD with a non-TLB referral status notifies the FSET worker that he or she is not interested in participating in FSET.
- A non-ABAWD or or an ABAWD with a non-TLB referral status has not communicated with the FSET worker for a period of two months after the referral date.

The requirements in the FSET Handbook 3.5 Contacting the Participant do not apply once a referral has been withdrawn.

The FSET worker may not withdraw a referral for an ABAWD with a TLB referral type prior to the individual exhausting his or her three *TLBs* or three additional months and becoming ineligible for FoodShare.

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## **4 FSET ORIENTATION AND ENROLLMENT PROCESS**

### **4.1 FSET Orientation and Enrollment Process**

All FSET participants must attend an orientation to the FSET program and participate in an initial enrollment appointment. During FSET enrollment and orientation, FSET agencies should provide individuals with detailed information about the FSET program and the ABAWD work requirement to allow them to make well-informed decisions about participating in FSET.

FSET participants may face barriers that make it difficult to access the FSET agency and/or participate in FSET activities, including limited access to transportation, computers, and telephones. FSET agencies are required to provide reasonable accommodations and supportive services to FSET participants to enable the participant to enroll and participate in FSET activities. Reasonable accommodations include using community resources to provide transportation, if available; traveling to a mutually agreed upon location that is conducive to providing confidential services to the participants; or providing services one-on-one rather than in a group setting. FSET agencies are required to provide translation services for FSET participants with limited English proficiency.

Enrollment in FSET, for the sole purpose of accessing supportive services, is not allowable. Supportive services are only allowable if the cost is reasonable and necessary in order to complete FSET activities. See FSET Handbook 5.0 Supportive Services.

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**4.2 Reserved**

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### 4.3 Orientation

At orientation, FSET agencies must provide participants with detailed program information including the benefits of FSET participation and an overview of available FSET activities and supportive services. The FSET agency must also accurately explain the ABAWD work requirement including the time-limited benefit policy, allowable ways to meet the ABAWD work requirement, and ABAWD exemptions in accordance with FoodShare Handbook 3.17.1 Able-Bodied Adults without Dependents (ABAWDs). The FSET agency should avoid describing the FSET program as required or mandatory, as it is a voluntary program and only one way individuals could meet the ABAWD work requirement.

The FSET agency must discuss participant rights and responsibilities using the FoodShare Employment and Training (FSET) Participation Agreement (F-00136). Individuals who choose to participate in FSET must sign the FoodShare Employment and Training (FSET) Participation Agreement (F-00136) at either orientation or the initial enrollment appointment. Prior to signing the agreement, participants must have the opportunity to review and ask questions about the agreement. The signed agreement must be given to the participant and also scanned into the electronic case file (ECF).

Assessment tools, barriers to participation, and a discussion of available community programs and resources may be introduced at orientation. If the FSET agency uses a form to collect barrier information, the FSET agency must inform FSET participants that the barriers form is optional.

At either the orientation or enrollment, FSET agencies may discuss the services available through the job retention component. Individuals often stop communicating with the FSET agency after gaining employment, making it difficult to provide follow-up support and to gather the information needed to claim an *Entered Employment*. Emphasizing services available through the job retention component during the enrollment process may increase the likelihood that the participant will keep communicating with the FSET worker after he or she gains employment.

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### 4.4 Initial Enrollment Appointment

The enrollment appointment must consist of a comprehensive participant assessment and the development of an initial employment plan.

#### 4.4.1 Assessment

During the initial appointment, the FSET worker must conduct a comprehensive, individualized participant assessment to identify the strengths, needs, and preferences of each FSET participant. The FSET worker must inform the FSET participant that all assessment forms will be kept confidential and that the questions about barriers are being asked to connect participants with resources to overcome barriers to employment. The FSET worker must explain that participants can opt out of answering questions related to barriers.

Individualized assessments must include, but are not limited to, identifying job readiness, level of job seeking skills, and other potential barriers to employment such as housing, transportation, family, or legal issues. The assessment process includes gathering past and current information from the participant or other relevant sources, either through informal or formal assessment. FSET agencies are encouraged to develop their own assessment tools or may use existing assessment tools for conducting a comprehensive, individualized assessment.

For the assessment at the initial appointment, the FSET worker must review past and present information about the following areas:

- **Barriers Assessment:** Collect information regarding barriers to employment in five categories: work participation, housing, transportation, legal issues, and job readiness.
- **Education Assessment:** Collect and document the participant's educational level and training information and relevant test scores. Achievement on educational test scores (e.g., TABE, WRAT, etc.) and certificate/degree completion should be tracked and updated upon reassessment, as necessary.
- **Employment Assessment:** Collect employment information for an individual or document if there is no employment history.

Information gathered through the assessment process is the driving force behind the development of an employment plan (EP). Once the initial EP is developed, the FSET worker must reassess participant progress in employment and training activities to determine if any additional support, changes to the EP, or changes to assigned activities are needed. Follow-up assessments may indicate if current activities or support should be increased, decreased, or eliminated. Assessment and re-assessment are ongoing FSET processes.



Assessment results may also reveal the need for FSET supportive services or for a referral to other community programs to address participant needs that are outside the scope of FSET. FSET workers must be aware of available community programs and resources that commonly serve FSET participants. The FSET worker must assist the participant in connecting with community programs, if necessary.

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### 4.5 Initial Employment Plan

An **EP** is a written agreement developed jointly by a participant and his or her case manager. The EP should be a mutually agreed upon plan based on the job seeker's strengths, needs and preferences, within the confines of policy and efficient use of funding. An initial EP must be completed at the initial enrollment appointment.

Following the assessment, the FSET worker must collaborate with the participant to develop an EP. The FSET worker must engage in a career planning process in partnership with the participant, the outcome of which is an individualized EP integrating the participant's career interests with local labor market conditions. Each participant's EP must include one or more employment goals and an action plan. The action plan includes the assignment of allowable activities designed to assist the participant in reaching employment and career goals. The FSET worker should use the S.M.A.R.T. criteria outlined below when setting participant goals:

- **Specific** – target a specific area for improvement;
- **Measurable** – quantify or at least suggest an indicator of progress;
- **Achievable** – specify goals that are reachable;
- **Realistic** – state what results can realistically be achieved, given available resources;
- **Time-related** – specify when the result(s) can be achieved.

An EP should:

- Be developed following a thorough assessment;
- Include a clear description of short and long term employment goals;
- Be used as a case management tool to identify an individual's occupational goals and to identify action steps to accomplish each goal;
- Be maintained at all times while a participant is enrolled in FSET, and;
- Be reviewed and updated as necessary. See the FSET Handbook 8.1 Employment Plan Reviews for information on requirements for completing EP reviews.

#### 4.5.1 Components of an Employment Plan

The EP consists of two main components: 1) goals and action steps and 2) individualized activities. Together, the FSET worker and participant must set goals, determine action steps, and select appropriate FSET activities and related supportive services necessary to achieve those goals. The participant has the option of accepting all or any part of the FSET worker's recommendations. However, ABAWDs choosing to meet the ABAWD work requirement through FSET participation are required to comply with qualifying activities in order to maintain FoodShare eligibility. If an ABAWD disagrees with the activities assigned, the FSET worker should identify other types of

qualifying activities from which the ABAWD may choose in order to maintain FoodShare eligibility, as long as completing those activities is realistic and directly related to an achievable goal.

#### **4.5.1.1 Goals and Action Steps**

The FSET worker should collaborate with the participant to develop at least one primary employment goal and associated action steps to reach that goal.

The Department of Health Services (DHS) also encourages the FSET worker to collaborate with the participant to develop secondary and long-term employment goals and action steps to reach those goals, as applicable to the participant's needs.

#### **4.5.1.2 Assign Component Activities**

After completing goals and action steps, the FSET worker must collaborate with the participant to assign one or more individualized activities that will facilitate progress toward reaching identified employment and training goals. The FSET worker must discuss the FSET agency's policies for collecting and turning in participation information for the assigned activities. The FSET worker should also explain the good cause policy for FSET participation in accordance with the FSET Handbook 6.6 Good Cause.

When assigning activities, the FSET worker must take into account the individual's ABAWD status and any allowable activities that the participant is already engaged in. For ABAWDs, the FSET worker should account for the following when assigning activities:

- **Qualifying Components for ABAWDs:** In order to meet the ABAWD work requirement, ABAWDs must participate in qualifying FSET component activities. Job search, including job search training, is not considered a qualifying component for ABAWDs unless it comprises no more than half of an ABAWD's monthly participation hours. For more information on which activities are considered qualifying activities for ABAWDs, see the FSET Handbook 1.4 FSET Component Activities.
- **Co-Enrollment in Another Work Program:** During the enrollment process, the FSET worker may become aware that the participant is co-enrolled in another employment program. Co-enrollment in FSET and other qualifying work programs is allowable to meet the ABAWD work requirement (see the FSET Handbook 10.5 Appendix E: Qualifying Work Programs for ABAWDs for a list of other allowable work programs). If a participant is co-enrolled in another program, the FSET agency must make contact with the other program to establish a collaborative partnership for serving the participant. Participation

hours in an allowable work program must be included on the participant's EP and must be tracked monthly.

- **FSET Participation Hours:** ABAWDs must meet the ABAWD work requirement by working (see the FSET Handbook 6.3.2.1 Definition of Working for ABAWDs) or participating in a work program for at least 80 hours per month. See FSET Handbook 6.3.2.2 ABAWD Work Requirement for more information on the ways to meet the ABAWD work requirement. Some ABAWDs need to participate in FSET for 80 hours a month in order to meet the ABAWD work requirement because they are not engaged in any other type of work or work program. Other ABAWDs are referred to FSET because although they are already partially meeting the ABAWD work requirement, participation in FSET would allow them to make up the difference between their current hours and the 80 hour requirement. When assigning activities on the EP, the FSET worker must determine each ABAWD's current work hours and other allowable activities outside FSET that must be counted on the EP prior to determining additional FSET participation hours. Activities that must be included on the EP include co-enrollment in an allowable work program, employment, or participation in other activities that may be categorized as FSET components on the participant's EP, such as an educational program. See FSET Handbook 6.3.2.3 Determining Participation Hours.
- **Workfare and Workfare Job Search:** When placing an ABAWD in workfare, the FSET worker should keep in mind that participation hours are determined differently for this activity type. See FSET Handbook 6.3.2.4 Determining Required Hours of Workfare Participation for details on determining participation hours for workfare. In addition, federal regulations allow ABAWDs, assigned to workfare, to complete a 30-day job search period prior to starting their workfare placement. This activity counts toward meeting the ABAWD work requirement. For more information on workfare job search, see FSET Handbook 6.3.2.5 Workfare Job Search.

The Assign Activity page in the CARES Workers Web (CWW) FSET Tool provides a detailed list of activity types that may be used to assign FSET activities. This list includes both qualifying and non-qualifying activities for ABAWDs. It also contains FSET fundable activities and activities that may be assigned, but are not fundable through FSET. See the FSET Handbook 10.3 Appendix C: FSET Fundable Component Activities for a detailed list of assignable component activities.

FSET education and work activity sites must not discriminate against the individual because of race, color, national origin, religion, sex, gender identity (including gender

expression), sexual orientation, disability, age, marital status, familial/parental status, income derived from any public assistance program, political beliefs, or reprisal or retaliation for prior civil rights activity. All FSET participation sites must be in compliance with federal, state, and local health and safety standards.

#### **4.5.2 Employment Plan Summary and Participant Signature**

The EP summary must be printed and signed by the participant and FSET worker each time an EP is created or updated. By signing the EP summary, the participant is agreeing to the goals, action steps, and assigned activities listed in their plan. A signed copy of the EP summary should be stored in the participant's electronic case file (ECF).

If the FSET worker mails the EP summary to the participant for a signature, it is requested that the participant sign and return a copy within 10 days of the receipt of the summary.

If a participant disagrees with and refuses to sign the EP summary, the FSET worker should explore other available FSET activities and participation options consistent with the results of the assessment and the goals of the FSET program. If an ABAWD disagrees with the activities assigned, the FSET worker should offer other types of qualifying activities from which the ABAWD may choose in order to meet the ABAWD work requirement and maintain FoodShare eligibility, as long as completing those activities is realistic and directly related to an achievable goal.

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### 4.6 PIN Comments

#### General Info regarding PIN Comments

FSET agencies should PIN comment all interactions with FSET participants. All FSET workers and DHS employees should be easily able to chronologically understand the participant's progress in the FSET program when reading the PIN comments. All PIN comments should stay professional and avoid workers' personal opinions about FSET participants.

#### 1. Orientation and Enrollment and Ongoing Assessments

All information gathered during the orientation and enrollment process as well as ongoing assessments must be summarized into PIN comments includes information that is entered into other pages of CWW including but not limited to the barriers, assessments, and the participants' strengths, needs and preferences.

All discussions of supportive services, and referrals to community resources, even if declined by the participant, must be included in PIN comments. If an FSET agency loses contact with an FSET participant, the FSET agency must include any known information as to why the participant discontinued communicating with the FSET agency.

#### 2. Employment Plan Development

Details related to a participant's Employment Plan should be captured through PIN Comments. Case workers should help participants brainstorm short-, medium-, and long-term goals related to employment activities. All relevant Assigned Activities, as well as, any changes made to the EP should be documented in PIN comments.

All discussions of the participants' short- and long-term goals and activity assignments must be included in PIN comments. This means that if a participant's employment plan is updated, a narrative of employment plan discussion must be included in PIN comments. If a participant has a short term goal of immediately obtaining employment, the FSET worker should encourage the participant to explore long-term goals that lead to sustainable employment and document this conversation in PIN comments.

#### 3. Communication with Outside Organizations

Communication with outside organizations including IM, other work programs, training providers and employers, should be documented in PIN comments. If a participant is co-enrolled in other work programs, this should also be documented along with any interaction case worker has with contacts in the co-enrolled

program. All interactions with IM agencies should be documented in PIN comments. This includes, but is not limited to, interactions assisting participants with obtaining exemptions, working with IM to update the ABAWD clock, and any other relevant updates provided.

#### 4. Template PIN Comments

Template PIN commenting is not generally encouraged by DHS but is acceptable. To ensure that correct templates and correct information are being used for each participant, it is best practice to double check templates and the information contained within. If DHS finds consistent errors in template PIN commenting, an agency may be directed to discontinue use of template PIN comments.

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## 5 SUPPORTIVE SERVICES

FSET agencies must provide supportive services to ABAWD and non-ABAWD participants for reasonable and necessary expenses that directly relate to FSET participation in allowable FSET activities. An ABAWD cannot be penalized for not meeting the ABAWD work requirement if the FSET agency fails to provide supportive services that are reasonable and necessary for meeting the FSET participation requirement. Good cause hours should be provided if required supportive services are unavailable to the participant.

For the purpose of determining whether a supportive service is reasonable and necessary for meeting FSET participation, the federal government defines these terms as follows:

**Reasonable Cost:** A cost is considered reasonable if it:

- Does not exceed that which someone who is careful with his or her finances would pay,
- Provides a program benefit generally in line with its cost,
- Is comparable to other similar types of program costs, and
- Is within the scope of FSET.

**Necessary Cost:** A cost is considered necessary if it:

- Is taken on in order to carry out essential functions of FSET,
- Cannot be avoided without negatively impacting program services and operations,
- There is a greater need for this expense compared to other competing needs for administrative resources, and
- Does not duplicate existing efforts. The product or service must not be available through another government program or available at no cost to the participant through a private source (e.g. charitable donations).

Supportive services, however, are not allowable as a stand-alone service. FoodShare members cannot enroll in FSET for the sole purpose of receiving supportive services. A participant must be enrolled and participating in at least one allowable FSET component activity in order to be eligible for supportive services.

**Example:** Phil, a FoodShare eligible student, is referred to FSET. Phil requests help with interviewing skills and finding work after graduation. He also needs help paying for textbooks. Phil is assigned to an educational component and is enrolled in interviewing and job seeking workshops. Supportive services for textbooks is allowable because Phil is assigned to at least one allowable FSET component with



allowable activities, and he is not enrolling in FSET for the sole purpose of receiving supportive services.

Supportive services for an FSET participant must be tracked on the Track Supportive Services page in the CARES Worker Web (CWW) FSET Tool. This page is used to list all instances of support services being requested, provided, or referred to a participant, along with the cost of each FSET-provided supportive service. Supportive services provided by the FSET agency, but funded by an outside source, must be tracked on this page with a zero dollar amount entered for the cost. When referrals are made to an outside agency that provide a supportive service, that supportive service does not need to be tracked on the Track Supportive Services page.

### **5.1 FSET Participant Expense Reimbursement**

FSET participants are eligible for assistance to cover the cost of transportation and other expenses that are reasonable and necessary for the completion of assigned FSET activities. The nature and scope of participant reimbursement for FSET-related expenses may vary from agency to agency, depending upon availability of funding and the extent to which barriers exist for the FSET participant within the local area. The most common types of participant reimbursements include:

- Transportation (mileage, bus tokens, bus passes, taxi cab vouchers, gas money) to and from the location of the FSET activity, see FSET Handbook Appendix D – Supportive Services Allowable Expenses;
- Child care and related costs, including enrollment fees;
- Clothing suitable for job interviews;
- Uniforms needed to participate in an assigned training/activity;
- Licensing and bonding fees;
- Textbooks, including GED/HSED test fees and training materials;
- Job Attainment Costs (job specific clothing and work-related tools); and
- Items required for maintaining employment obtained
  - As a result of participating in FSET, or
  - Prior to FSET if both statements are true:
    - Current employment is included as an assigned activity on the Employment Plan, and
    - Other activities are assigned in addition to current employment

\* Reimbursement for assistance with textbooks, training materials, school supplies, tuition, lab fees, and other education-related costs necessary for training, is not allowable if the same assistance is provided to non-FSET participants for free. See FSET Handbook Appendix C – Post-Secondary Education Component Activity for additional requirements.

In addition to expense reimbursement for job search, work experience, workfare, and education, participant reimbursement is also allowable for expenses incurred as a result of participating in other FSET components including:

**Self- Employment:** FSET services for this component primarily consist of providing technical assistance to participants with sound business ideas to start or expand their own business. Participant reimbursement for minor items such as business cards and transportation expenses are allowable FSET expenses. Reimbursement for the purchase of equipment, such as a computer or vehicle, is not an allowable FSET expense.

**Career Advancement and Enhancement:** FSET agencies may serve individuals who are employed full-time or part-time. Allowable expenses for career advancement and enhancement may include reimbursement for training or completing course work that will allow the FSET participant to increase earnings at a job he or she obtained prior to volunteering for FSET.

**Note:** The Farm Security and Rural Investment Act of 2002 lifted the \$25 transportation and work-related expense limit.

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## **5.2 Child Care Expense Reimbursement**

Based on the availability of funding, FSET agencies may reimburse the actual cost of dependent care up to either the local market rate or the statewide limit, whichever is lower. Eligibility for child care through the Wisconsin Shares child care subsidy program should be pursued prior to expending FSET funds on child care. Child care providers are eligible for reimbursement if they are licensed by the state, certified by the county or tribe, or operated by a school board. Child care expenses provided by licensed or certified relatives are eligible for reimbursement up to the maximum rate allowed as a Provisional Certified Family Care Provider.

A child care provider living in the child's household is ineligible for child care reimbursement through the FSET program. Unregulated child care cannot be funded by FSET unless the child or regulated provider is ill and unregulated care is the only option available.

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### 5.3 Job Retention Expense Reimbursement

FSET agencies may provide reimbursement for items that are reasonable, necessary, and directly related to maintaining employment that was obtained after enrolling in FSET. Participants may participate for up to 90 days in the job retention services component. Participants who obtained employment prior to FSET enrollment may not receive job retention expense reimbursement. Reimbursable job retention costs may include, but are not limited to:

- Clothing required for the job
- Equipment or tools required for the job or job training
- Test fees
- Union dues
- Relocation expenses
- Licensing and bonding fees
- Transportation
- Child care

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## 6 PARTICIPATION

### 6.1 FSET Participant Responsibilities

FSET participants must carry out the following responsibilities:

- The participant must be capable of performing the assigned FSET activities as agreed upon in the employment plan. If the participant is unable to perform an assigned activity or his or her employment status changes, the participant should contact the FSET case worker to re-evaluate and update the employment plan.

**Note:** Assigned FSET activities must adhere to federal non-discrimination requirements as well as federal, state, and local health and safety standards.

- The participant must attend and participate in scheduled, assigned appointments. If the participant is unable to keep an appointment or anticipates being late for an appointment, he or she must notify the FSET case manager before the appointment. If the participant is unable to make contact before the appointment, he or she must do so as soon as possible.
- The participant or FSET activity service provider should turn in attendance information for assigned activities in-person, over the phone, via email, via fax, etc. The participant should work with the FSET case manager to determine the type of documentation that is required for each assigned activity.
- The participant must notify the FSET case manager immediately of any issues that prevent participation in assigned activities or that prevent participation in the FSET program overall. The FSET case manager may request verification of missed participation in order to determine good cause for non-participation.
- The participant should inform the FSET case manager if he or she is no longer interested in participating in the FSET program.

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## 6.2 FSET ABAWD Status

FoodShare members are assigned an Able-Bodied Adults without Dependents (ABAWDs) status. This status is determined by the Income Maintenance (IM) agency and is provided to FSET agencies as part of a referral or referral update. FSET workers should be aware of notifications from the IM agency regarding changes in ABAWD status as these changes impact FSET participation requirements. The three participation statuses include ABAWD, Non-ABAWD, and FoodShare Ineligible.

### 6.2.1 Non-ABAWD

A FoodShare member is a non-ABAWD if he or she meets any one of the following criteria, as determined by the IM agency:

- Under age 18\* or age 50\*\* and older
- Residing in a FoodShare household with a child under age 18\*\*\*
- Pregnant
- Determined unfit for employment, which includes someone who is:
  - Receiving temporary or permanent disability benefits from the government or a private source
  - Unable to work due to physical or mental challenges, as determined by the IM agency
  - Verified as unable to work by a statement from a health care professional or a social worker (may use Form-01598 Medical Exemption from Work Requirement for ABAWDs to verify)
  - Experiencing chronic homelessness
    - An individual is chronically homeless if he or she currently lacks a fixed regular nighttime residence and does not expect to have a regular nighttime residence in the next 30 days. This includes people who are in a temporary housing situation.
- Receiving Unemployment Compensation (UC) or has applied for UC and is complying with UC work requirements
- Regularly participating in an alcohol or other drug abuse (AODA) treatment or rehabilitation program
- A student of higher education and is otherwise eligible for FoodShare, see the FoodShare Handbook 3.15.1 Student Eligibility
- A high school student 18 years of age or older, attending high school at least half-time
- Primary caretaker of a dependent child under age 6 or an incapacitated person
- Complying with Wisconsin Works (W-2) program requirements
- Working 30 or more hours per week or earning wages equivalent to 30 or more hours per week at the federal minimum wage

\*Age 18: ABAWD status applies the month following the month the FoodShare applicant or member turns age 18.

**\*\*Age 50:** ABAWD status is lost the first day of the month an ABAWD turns age 50.

**\*\*\***An individual may be determined a non-ABAWD if he or she resides in a FoodShare unit where a household member is under age 18, even if the household member who is under age 18 is ineligible for FoodShare.

Non-ABAWDs who meet the exemption criteria are not subject to TLBs and do not need to meet the ABAWD work requirement during months in which they have a verified exemption. Non-ABAWDs are referred to FSET only upon their request. However, individuals that have a pending exemption may be referred to FSET as ABAWDs. In such cases, once an exemption is verified, the IM agency will send a referral update to notify the FSET agency of the status change. ABAWDs may gain or lose exemptions for a variety of reasons. See FSET Handbook Appendix G – FSET ABAWD Statuses (and FSET Referral Types) for more information.

Although IM workers have primary responsibility for determining ABAWD exemptions, FSET workers may also identify that an individual qualifies for one of the ABAWD exemptions listed above once they begin working with a participant. When an ABAWD exemption is identified, the FSET worker must contact the IM agency to notify them of the exemption and work with the participant to initiate the process of verifying the exemption.

For more information about ABAWD status and exemptions, see FoodShare Handbook 3.17.1 Able-Bodied Adults without Dependents (ABAWDs).

## **6.2.2 Reserved**

### **6.2.3 ABAWD**

A FoodShare member is an ABAWD if he or she does not meet any of the criteria that make an individual a non-ABAWD as determined by the IM agency. ABAWDs are subject to TLBs and need to meet the ABAWD work requirement to remain eligible for FoodShare. One of the ways these individuals can meet the work requirement is through FSET participation.

All ABAWDs with a TLB referral type receive a referral to FSET. ABAWDs with a TLB referral type are not required to participate in FSET as a condition of FoodShare eligibility. However, they may lose eligibility for FoodShare due to failing to meet the ABAWD work requirement after exhausting three months of TLBs in a 36-month period. The 36-month period begins when an ABAWD receives their first TLB. Once three TLBs are received, FoodShare eligibility is lost for the remainder of the 36-month period unless an ABAWD becomes a non-ABAWD or begins meeting the work requirement.

For more information about ABAWD status and exemptions, see FoodShare Handbook 3.17.1 Able-Bodied Adults without Dependents (ABAWDs).

**Note:** An individual may request a fair hearing if he or she disagrees with the IM agency's determination of ABAWD status. For more information see FoodShare Handbook 6.4.1 Fair Hearings.

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## **6.3 FSET Participation Requirements**

### **6.3.1 Non-ABAWD Participation**

Non-ABAWDs may participate in FSET, but do not need to meet the ABAWD work requirement. Non-ABAWD FSET participants must be assigned to at least 12 hours of FSET activities per month but are not required to participate 12 hours per month. FSET agencies are required to work with the volunteer to establish reasonable expectations and hours of participation.

### **6.3.2 ABAWD Participation**

ABAWDs who do not meet the ABAWD work requirement will only be allowed to receive up to three full months of FoodShare benefits in a 36-month time period. ABAWDs subject to time-limited benefits (TLBs) may choose to meet the work requirement by participating in FSET.

#### **6.3.2.1 Definition of Working for ABAWDs**

For ABAWDs, working is defined as one of the following:

- Work in exchange for money;
- Work in exchange for goods or services (in-kind);
- Unpaid work (e.g. volunteer work, community service);
- Self-employment; or
- Any combination of the above.

#### **6.3.2.2 ABAWD Work Requirement**

An ABAWD is considered to be meeting the ABAWD work requirement if one of the following applies:

- Working a minimum of 80 hours per month. Use converted work hours if paid weekly or bi-weekly;
- Participating in and complying with the requirements of an allowable work program\* at least 80 hours per month;
- Both working and participating in an allowable work program for a combined total of at least 80 hours per month; or
- Participating in and complying with the requirements of a workfare program.

\* See Appendix E for information about 'allowable' work programs. This information is relevant when counting participation hours for ABAWDs who are co-enrolled in FSET and another allowable work program.

**Note:** Participation in the FSET program is voluntary. ABAWDs subject to TLBs may choose to meet the work requirement by participating in FSET. An ABAWD with a TLB

referral enrolled in FSET must participate in qualifying activities in order to meet the work requirement and maintain ongoing FoodShare eligibility.

### **6.3.2.3 Determining Required Hours of Participation**

ABAWDs who enroll and participate in FSET as a way to meet the work requirement may or may not need to participate in FSET for the full 80 hours per month. Some individuals may be partially meeting the work requirement through part-time work or participating in a work program other than FSET for fewer than 80 hours per month. Other individuals may be participating for fewer than 80 hours per month in other activities, such as an education program, that should be categorized as an FSET component and included on the participant employment plan. Individuals who are partially meeting the ABAWD work requirement outside of FSET can fulfill the full 80-hour work requirement by participating in FSET to close the gap in hours. The FSET worker should review each case independently to determine the number of FSET participation hours that would allow each ABAWD to meet the work requirement.

### **6.3.2.4 Determining Required Hours of Workfare Participation**

FSET participation requirements differ for workfare, in terms of the number of hours needed for an ABAWD to meet the work requirement. The number of required workfare hours per month is equivalent to the household's current monthly FoodShare allotment divided by the state or federal minimum wage, whichever is higher. It is not allowable to require additional hours of participation beyond the maximum requirement calculated as described above. Changes in the amount of the monthly FoodShare allotment may increase or decrease the number of required monthly hours for workfare. If there is a change in benefit amount, the FSET agency should recalculate the required number of participation hours, and apply that change beginning the month that follows the month the change in allotment becomes known to the FSET agency. The monthly hours of participation in workfare can be rounded down to the nearest whole number. However, agencies should not round down weekly participation in workfare. When monthly workfare hours do not divide into a whole number for weekly workfare activity assignment, agencies may:

- Use half and quarter hours for weekly workfare assignment; or
- Assign varying weekly hours in workfare on the EP. For example the case manager can assign a certain number of hours for the first 3 weeks and assign the remaining hours in the final week, as long as the total hours equal household's allotment divided by the minimum wage rounding down to the whole number.

Annual changes in allotment amounts, utility allowances, and other credits occur on October 1. FSET agencies should review workfare participation calculations for all ABAWDs in October.

Workfare is a household-level program, meaning that all ABAWD household members share the hourly obligation each month. FSET agencies should document in the FSET participant's PIN comments when the participant lives in a household that includes multiple ABAWDs sharing responsibility for meeting workfare participation requirements. ABAWDs are not required to report changes in household composition to their IM agency, except at the time of FoodShare renewal or Six Month Report Form (SMRF). When a change in household composition is reported, this status change will not result in a referral update being sent to the FSET agency for individuals who remain on the case. An updated referral will be sent when an individual is deleted from a case. When the FSET worker receives a referral update for a workfare participant with a status of "FoodShare Ineligible," they should check the CARES Worker Web (CWW) case to see if there are or were other workfare participants whose hourly participation requirement needs to be updated. See the FSET Handbook 1.4.3 Workfare for more information on assigning participants to workfare.

**Example 1:** Tim and Joe are receiving \$200 in FoodShare benefits per month. Minimum wage is \$7.25 per hour. The FSET agency divides the monthly allotment of \$200 by the minimum wage of \$7.25, and determines that Tim and Joe must participate in workfare for a combined total of 27 hours per month ( $\$200 \div \$7.25 = 27.59$  or 27 hours per month).

Tim and Joe may choose to share the responsibility equally by each participating a part of the hours per month to meet the participation requirement, or may agree to divide the hours so that one of them participates for more hours than the other. It is allowable for either Tim or Joe to complete all required household hours on his own.

**Example 2:** In August, Lisa and Kim share workfare participation requirements equally. On September 20, Lisa reports that Kim moved out of the home. Lisa becomes solely responsible for completing the workfare participation requirement effective November 1. If the change had been reported prior to September Adverse Action (AA), the change would have been effective October 1.

#### 6.3.2.5 Workfare Job Search

Prior to placing an ABAWD in a workfare position, a workfare job search period may be established for up to 30 days. An ABAWD may only participate in workfare job search during the first 30 days after enrollment in FSET at initial certification. ABAWDs who are employed should not be assigned to workfare job search. Non-ABAWDs should not be assigned to workfare job search. See the FSET Handbook 1.4.3 Workfare for more information on assigning participants to workfare.

**Example 3:** Andre is receiving \$180 in FoodShare benefits per month. He is placed in workfare job search for the initial 30 days. The FSET agency divides the monthly allotment of \$180 by the minimum wage of \$7.25, and determines that Andre must participate in workfare job search for a combined total of 24 hours per month. ( $\$180 \div \$7.25 = 24.83$  or 24 hours per month) to meet the work requirement.

### 6.3.3 FSET Monthly Participation Limit

Because Wisconsin operates a voluntary FSET program, FSET participants are not subject to the 120 hour-a-month participation limit or the requirement that the number of hours of participation cannot exceed the household's FoodShare allotment divided by the minimum wage. This allows individuals who work part-time or full-time to participate in FSET.

A FoodShare member may receive employment and training services to increase opportunities for job security, career enhancement and/or advancement.

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## 6.4 Co-Enrollment in FSET and Another Allowable Work Program

FSET participants may be co-enrolled in another allowable work program for the purposes of meeting the ABAWD work requirement. These work programs include:

- Refugee Employment and Training
- Wisconsin Works (W-2)
- Trial Employment Match Program (TEMP)
- Children First
- Workforce Innovation and Opportunity Act (WIOA) programs
- Refugee Cash Assistance programs
- Programs under section 236 of the Trade Act

When an ABAWD, who is enrolled in another allowable work program, is also enrolled in FSET, the FSET worker should work closely with the participant's case worker for the other program. The FSET worker must accurately determine how many hours the ABAWD participates in the co-enrolled program and how many hours of FSET participation are required each month in order to meet the ABAWD work requirement. If an ABAWD is meeting the work requirement through participation in another allowable work program, he or she also may be voluntarily referred to FSET with a non-TLB referral in order to co-enroll.

### 6.4.1 Participation in Non-Qualified Employment and Training Programs

Some FSET participants are participating in other employment or education programs that do not fall under the allowable work program list above. The hours spent in those programs may be able to count as an FSET component (see FSET Handbook 1.4 FSET Component Activities). For example, if a participant is enrolled in another education and training program, the hours of participation in this program could be entered on the employment plan. The hours could assist the participant in meeting the ABAWD work requirement if they fall under a definition of an FSET component. The FSET participant participating in other employment or education programs will need to have an employment plan and participation tracked in the FSET Tool to meet the ABAWD work requirement.

**Example:** Charlotte is a newly referred FSET participant. She informs her case manager that she is starting a certified nursing program funded by a local community service organization at the local technical college next week. She will attend class 12 hours per week and complete four hours of study time. She spends 16 hours a week on her education. When her FSET case manager enters her activity information for this time period into the FSET Tool, she counts the 16 hours under the post-secondary education component. Charlotte is also enrolled in four hours of job search a week. The FSET case manager must record participation information for both the certified nursing program and the job search.

## 6 Participation

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## 6.5 Tracking FSET Participation

Tracking FSET participation hours and indicating whether the monthly FSET participation requirement is met requires timely action by the FSET agency. Accuracy of FoodShare eligibility determinations for ABAWDs is dependent upon the FSET agency's timely entry of monthly participation hours into the **CWW** FSET Tool. FSET agencies are responsible for taking the following actions:

- Monitoring ABAWDs monthly and determining if monthly participation requirements are met.
- Entering monthly participation into the FSET Tool and indicating if the work requirement was met by the fifth day of the month following the participation month.
- For ABAWDs in the third time-limited benefit (TLB) month, indicating if ABAWDs are anticipated to meet the current month's work requirement by the second Saturday of the month.

It is critical that participation is entered timely so that ongoing FoodShare eligibility is determined correctly. If participation is not entered timely, the individual may exhaust his or her TLBs and no longer be eligible for FoodShare for the remainder of 36 months. See FSET Handbook 10.6 Appendix F: FSET Worker Time Frames for details on FSET worker time frames for taking action related to tracking and monitoring participation in the FSET Tool.

### 6.5.1 Monthly Participation

FSET agencies must collect and record attendance information in CWW for assigned activities for all ABAWD and non-ABAWD participants. All participation documentation must be obtained from the FSET participant, work site or other education and training providers on a monthly basis (at minimum). The documentation must be maintained in the participant's electronic case file (ECF). FSET agencies must provide participants with a variety of methods for submitting participation hours including, but not limited to, in-person, over the phone, email, 24-hour drop boxes, and fax.

FSET agencies are responsible for collecting group activity participation when multiple participants are engaged in the same activity at one location. It is the primary responsibility of the participant to return the paperwork to the agency verifying participation in activities that involve an activity log. The agency should make arrangements to get the paperwork directly from the service provider when possible. FSET agencies can encourage participants to turn in participation hours on a weekly basis, however, FSET agencies must notify participants that they should at a minimum submit documentation of participation hours by the end of the current month of participation.

Individuals assigned to job retention should be assigned to exactly one hour per month of job retention. See FSET Handbook 1.4.6 Job Retention for more information on this activity. Record the number of work hours under the employment activity code. Any additional activities should be recorded under that specific activity code.

### **6.5.2 Education and Training Participation**

For most types of assigned activities, countable hours of participation correspond directly to time spent engaged in the activity. However, for some education and training activities, a certain amount of study time can also count toward meeting the work requirement.

For education and training activities, count the number of hours the person is in the classroom and up to one hour of unsupervised study time for each hour of class time. Supervised study time may also be assigned under this activity and tracked for attendance purposes. A statement from the educational program indicating that an additional amount of study time may be required to successfully complete the course can be included in the assigned number of hours.

See FSET Handbook 10.3 Appendix C: FSET Fundable Component Activities for details on the specific FSET component activities for which study time can be counted toward meeting the work requirement.

### **6.5.3 Reasonable Anticipation of FSET Participation**

Although FoodShare benefits are issued prospectively at adverse action, knowledge of FSET participation compliance is retrospective. When an ABAWD has exhausted three months of TLBs, FoodShare eligibility will end unless he or she is meeting the work requirement or has verified an exemption. For individuals who have begun participating in FSET, the FSET worker must indicate whether it is reasonably anticipated that the ABAWD will meet the current month's work requirement through FSET participation so that the individual can continue receiving FoodShare. (See the FSET Handbook 6.5.4.3 Anticipated to Meet Work Requirement for time frames related to recording that an individual is anticipated to meet the work requirement by the end of the month).

Reasonable anticipation of FSET participation is based upon the FSET worker's assessment of FSET participation since the beginning of the current month and whether participation is expected to continue in order to meet the work requirement by month's end. The reasonable anticipation of FSET participation information entered into the CWW FSET Tool is used by CWW to determine FoodShare eligibility prospectively for the next month. Reasonable anticipation of FSET participation is designed to prevent FoodShare from being incorrectly terminated, should the ABAWD begin meeting the work requirement through FSET participation during the third TLB or second and third additional benefit months.



Reasonable anticipation of meeting the work requirement through FSET participation may only be applied when the FSET worker determines that one of the following conditions is met:

- An ABAWD is enrolled and fully participating in FSET by the second Saturday of the third TLB month, and it may be reasonably anticipated that the work requirement will be met by the end of the month, or
- An ABAWD met the work requirement in the second additional benefit month, is fully participating in FSET in the third additional month or any extended benefit month, and it may be reasonably anticipated that the work requirement will be met by the end of the month.

Once the FSET worker initiates reasonable anticipation of meeting the work requirement through FSET participation during the current FSET participation period, the worker must continue to make this determination each month going forward if the individual is an ABAWD and remains enrolled in FSET.

**Note:** FSET workers should evaluate whether a participant is reasonably anticipated to meet the requirement by the end of the month on a case by case basis. If the FSET worker indicates that an ABAWD is anticipated to meet the work requirement by the end of the month, but the participant does not follow through, the participant may have erroneously received FoodShare benefits for that month. In these cases, the participant may be subject to an overpayment and may need to repay these benefits.

**Example 1:** Tamika, an ABAWD, received a TLB for July and another for August. Tamika enrolled and began participating in FSET on September 2. On September 13, the second Saturday of the month, Tamika's FSET case manager determines that based on Tamika's participation during the first two weeks of September, she can reasonably anticipate that Tamika will meet FSET participation requirements for the month of September. If Tamika failed to meet the work requirement for September and did not have good cause, the FSET worker would indicate in CWW that the work requirement was not met. Tamika would receive her third TLB in September.

#### 6.5.4 Time Frames

FSET agencies are responsible for tracking the following within the specified time frames (see FSET Handbook 10.6 Appendix F: FSET Worker Time Frames for details on FSET worker time frames):

##### 6.5.4.1 Monthly Participation

By the fifth of the current month, the FSET agency is responsible for recording all prior month participation hours in the CWW FSET Tool.

#### 6.5.4.2 Met Work Requirement

By the fifth of the current month, the FSET agency is responsible for recording whether the prior month's work requirement was met. This determination should take into account FSET participation hours and any good cause granted.

This action should be taken only for ABAWD participants who must meet the work requirement. The FSET agency's timely recording of this information is used by CWW to determine an ABAWD's ongoing eligibility for FoodShare. If the agency does not indicate timely whether the work requirement was actually met, an individual's eligibility for FoodShare may end incorrectly, resulting in FSET disenrollment and a lapse in FSET services.

#### 6.5.4.3 Anticipated to Meet Work Requirement

By the second Saturday of the month, the FSET agency is responsible for recording whether a participant is anticipated to meet the ABAWD work requirement by the end of the current month.

This action should only be taken for all ABAWDs who are enrolled, fully participating in FSET, expected to meet the ABAWD work requirement through FSET participation by the end of the current month, and:

1. Are in their third TLB month, or
2. Are in their second or third additional benefit month or an extended benefit month, with no break in FSET participation since the second additional benefit month.

The FSET agency's timely recording of this information tells CWW that FoodShare benefits may be issued prospectively for the next month. If the agency does not indicate timely whether it is anticipated that the ABAWD work requirement will be met by the end of the month, an individual's eligibility for FoodShare may end incorrectly, resulting in FSET disenrollment and a lapse in FSET services.

**Note:** Recording whether a participant in the third TLB month, third additional month, or any extended benefit month is anticipated to meet the ABAWD work requirement must be completed each month for the remainder of the individual's FSET participation period. This keeps an individual from inaccurately being determined FoodShare ineligible and allows CWW to issue benefits prospectively for the following month by updating the FoodShare clock to 'Active in FSET' status.

**Example 2:** Susie is an ABAWD. In March, her third TLB month, Susie enrolls and is participating in FSET in order to meet the ABAWD work requirement. The

FSET worker determines that Susie is anticipated to meet the March ABAWD work requirement by the end of the month. The FSET worker updates the 'Anticipated to Meet Work Requirement?' indicator on the Track Participation and Good Cause page to 'Yes' prior to the second Saturday in March so that Susie can maintain FoodShare eligibility and continue participating in FSET. After this question has been answered, the FSET worker should continue to update this indicator each month based on Susie's current and expected FSET participation until she is disenrolled from the program.

If the FSET worker enters 'No' to the "Anticipated to Meet Work Requirement?" question and then the FSET participant completes the ABAWD work requirement for that month, the FSET worker must contact the IM agency as soon as they become aware or at least by the 5th of the following month so the IM worker can adjust the member's case to reflect this new information.

**Example 3:** Mary's third TLB month is in December. She enrolled in FSET on December 8 and completed 10 hours that week. This scenario does not meet the requirements to mark the "Anticipated to Meet Work Requirements?" question as 'Yes' so the FSET worker updates this question on the Track Participation page to 'No'; Mary's FoodShare case will close on December 31st. Mary turns in her participation logs on the last day of December and she participated 80 hours in the month of December.

Since Mary met the ABAWD work requirement by the end of the month, Mary's FoodShare clock should be updated to reflect this participation. The FSET agency must contact the IM agency as soon as they become aware the individual met the ABAWD work requirement and no later than the 5th of the following month. The FSET agency must enter the participation information and also add PIN comments. IM agency staff should update the FoodShare clock, issue an auxiliary payment for January, and case comment actions taken on the Mary's case. This process is only necessary for members who are in their third TLB month, the "Anticipated to Meet Work Requirements?" question is answered 'No,' and the individual meets the ABAWD work requirement in that month.

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## 6.6 Good Cause

The FSET agency is responsible for documenting FSET non-participation in assigned activities, while taking into consideration reasons that justify granting good cause.

Granting good cause allows an ABAWD participant to maintain FoodShare eligibility if he or she remains enrolled in FSET but is temporarily unable to meet the work requirement. Before the FSET agency indicates that an individual's monthly work requirement was unmet, a decision must be made to determine if there was good cause for the non-participation. The FSET worker indicates good cause on a monthly basis as part of tracking FSET participation hours, if necessary. When making decisions about granting good cause, the FSET worker should consider all facts and circumstances and seek additional information from other sources for clarification, as needed. FSET agencies also have the ability to question good cause when it seems questionable and request verification.

If the FSET participant is not attending their activities without valid good cause, their participation hours should reflect the lack of participation. Non-participation of an ABAWD participant without good cause will result in use of one of the three time-limited benefit (TLB) months. If all three TLB months have been exhausted, non-participation without good cause may result in loss of FoodShare eligibility, unless the participant becomes a non-ABAWD.

### 6.6.1 Good Cause Reasons

Good cause may be granted for temporary circumstances beyond the ABAWD's control, such as, but not limited to:

- Illness;
- Illness of another household member serious enough to require the participant's presence;
- Unavailability of transportation;
- Unanticipated emergency;
- Employment or work program placement is no longer suitable;
- The participant is terminated from a job or work program assigned activity due to circumstances beyond his or her control;
- The participant is unable to meet participation requirements because they were disenrolled and re-enrolled in FSET in the same month. This may occur if the FSET agency receives a referral update indicating that the participant is FoodShare ineligible, but FoodShare never truly closed; and
- Unavailability of participant reimbursement for expenses reasonable and necessary to participate in FSET.

**Note:** The FSET worker must document in PIN comments when good cause is granted. The description in PIN comments should include the reason and circumstances for granting good cause.

### **6.6.2 Verification of Good Cause**

Agencies may verify good cause in cases where a pattern of absences exists, and the agency identifies that the explanation provided is questionable. A “pattern of absences” must extend beyond three consecutive working days or five working days in a rolling 30 calendar day period.

The FSET agency must determine whether there is a reasonable explanation on a case-by-case basis using their knowledge, experience, and familiarity with the case.

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## 6.7 Communication With IM Agencies About FSET Participation and Good Cause

Communication between the FSET worker and Income Maintenance (IM) worker is essential to facilitating FSET program participation, determining ABAWD status, monitoring the participation of ABAWDs, and collaborating on good cause granted to ABAWDs subject to work requirements. It is important for the FSET and IM agencies to establish positive working relationships and regular channels for communication.

- The FSET worker should respond to notifications about FSET participants received from the IM workers and follow up with IM workers when clarification is needed.
- The FSET worker should initiate contact and share information, within the boundaries of confidentiality requirements, with IM workers when becoming aware of the need for IM action on a case.
- The FSET worker should communicate with IM agencies when they identify that an ABAWD may have an exemption from the monthly work requirement.
- The FSET worker should provide all necessary documentation and appear with the IM agency to represent the Department of Health Services in the event of fair hearings that involve FSET participants.

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## **6.8 Decision to Deny Participant Access and/or Services**

The FSET agency has the right to deny a participant access to the FSET office and no longer provide employment and training services to a participant whose behavior is determined to be detrimental to FSET operations and/or puts the safety and progress of other participants and staff at risk. FSET participant behavior that warrants prohibiting access to the office and/or services includes but is not limited to:

- Offenses or threats against FSET property or any other person on FSET premises.
- Actions that disrupt or interfere with FSET operations and processes.
- A continued pattern of violation of agency rules after a notice of the rules has been given.

The FSET agency management staff must follow a previously established internal process for determining whether a participant will be denied access to the office and/or services due to his or her behavior. The process must include providing the participant with written documentation that includes a description of the detrimental behavior and the timeframe that the participant will be denied access to the FSET office and/or services. The written explanation must be sent to the participant. The written explanation must also include the ability for the individual to request an appeal of the decision to deny access and/or services. The decision to deny access and/or services shall maintain in effect until the end of the specified timeframe or until FSET agency management terminates the decision to deny access and/or services, whichever occurs first.

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## **7 EMPLOYMENT AND RETENTION**

### **7.1 Employment**

A primary goal of FSET is to help participants gain and retain employment. The FSET worker should enter information about past, current, and new employment on the employment page in the CARES Worker Web (CWW) FSET Tool. This page provides a place to detail information about the employment, including whether the employment is considered to be an 'Entered Employment'. Entered Employment is a term used by work programs to identify those employment entries for which the agency may receive credit for placing the individual in unsubsidized employment.

#### **7.1.1 Suitable Employment**

An FSET participant who is subject to the general FoodShare work registration requirements should accept an offer of suitable employment if the position is within the scope of their employment goal as defined by his or her employment plan. An offer is considered suitable employment if all of the following apply:

- Pay is equivalent to minimum wage or higher.
- The employee is not required to join, quit, or refrain from joining a union or trade organization.
- The job is not obtained due to strike or lockout.
- The job does not pose health risks.
- The job matches a person's physical and mental ability to perform the job.
- If employment is offered on a piece-rate basis, the expected average hourly pay (piece-rate multiplied by the average hourly output) is at least minimum wage.
- The daily round-trip commuting time is less than 2 hours, excluding time transporting a child to or from childcare.
- The distance to the job allows for walking, or public or private transportation is available.
- The hours of work or nature of work does not interfere with the person's religious observations, convictions, or beliefs.
- Within the first 30 days of work registration, the employment must be in the person's field of experience.

#### **7.1.2 Entered Employment**

An Entered Employment should be assigned when a job is obtained while enrolled and participating in FSET. The new job must meet all of the below criteria:

- Meets the definition of part-time employment, full-time employment, or self-employment (see Appendix A),
- Has a start date on or after the FSET enrollment start date,
- Is gained prior to disenrollment from FSET,
- Is gained as a result of FSET participation,



- Is not a job change while employed by a temporary agency, and
- Fits one of the following:

Initial Condition	New Condition
From no job	To an unsubsidized job
From an unsubsidized job	To an additional unsubsidized job with a different employer
From an unsubsidized job	To a different unsubsidized position with the same employer due to promotion
From a subsidized job	To an unsubsidized job
From a full-time unsubsidized job	To a full-time unsubsidized job with a different employer
From a part-time unsubsidized job	To a full-time unsubsidized job with a different employer
From a part-time unsubsidized job	To a part-time unsubsidized job with a different employer
Meets the special condition described	Temporary to Permanent Hires (Appendix A)

Do not assign an Entered Employment to a job that fits any one of the following criteria:

- Any position in which the income cannot be budgeted for the FoodShare benefits (example: work-study),
- An entry into a work experience position or volunteer job, or
- Any ONE of the following:

Initial Condition	New Condition
From no job	To a subsidized job (update -- OJ or WX (Appendix C)
From a job	To a subsidized job (update -- OJ or WX (Appendix C)
From a job	To the same job with an increase in gross pay due to regular pay increases and not a job promotion.
From on strike	To return to same employer
From layoff status or medical leave	To return to same employer regardless of change in job title (even if held another job in-between) if the employee/employer relationship had not been severed and the employee did not have to reapply to return to work.

Before the FSET worker records an Entered Employment, the FSET worker must confirm that the employment began, and that Entered Employment conditions have been met in accordance with procedures established by the FSET agency. The FSET worker must inform the IM agency when the participant gains employment.

**Note:** If the position is subsidized or voluntary, do not record as an Entered Employment. Instead, record this position as unpaid work experience or voluntary employment.

### **7.1.3 Special Types of Employment**

The following types of employment have special considerations for identifying an employment as an Entered Employment for FSET participants:

- Self-employment
- Employment through a temporary agency
- Work study
- Internship

#### **7.1.3.1 Self-Employment**

Self-employment is considered an Entered Employment if it meets the criteria as described above. Divide the gross monthly income reported by the minimum wage, and then divide that number by 4.3 to determine part-time or full-time employment. If the result is 30 or greater, then the employment is considered full-time. If the result is less than 30, then the employment is considered part-time employment.

#### **7.1.3.2 Employment through a Temporary Agency**

When an individual is assigned to a work site by a temporary agency (also known as staffing agency or employment agency) acting as the employer, the temporary agency is considered the employer for reporting purposes, not the organization in which the individual is placed. The temporary agency name should be recorded as the employer in the FSET Tool.

If the individual is newly hired by the temporary agency, the job may meet the criteria for an Entered Employment. However, if the participant simply changes sites or jobs, but is still employed by the temporary agency, the job or site change does not count as another Entered Employment. Each time a change occurs, the FSET worker should update the employment page by end-dating the old employment sequence, using 'SE - Seasonal Employment' in the 'Reason for Leaving' field. A new employment should be entered with the employment begin date of the new job/site change. The 'Entered Employment' field is No. The temporary agency should be re-entered as the employer.

#### **7.1.3.3 Work Study**

Work-study positions are subsidized employment designated to assist students in meeting their educational financial needs. Work study jobs do not meet the definition of Entered Employment, whether working part-time or full-time.

#### **7.1.3.4 Internship**

An internship is considered to be part of the post-secondary education activity, whether it is paid or unpaid, because the participant earns academic credit. If the internship meets the definition of an Entered Employment, then it may be entered as such.

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**7.2 Reserved**

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## **8 ONGOING PROGRAM MAINTENANCE**

### **8.1 Employment Plan Reviews**

FSET workers are expected to conduct regular employment plan (EP) reviews, in collaboration with participants. This should include a review of changes in employment, educational attainment, and barriers to employment. It should also include a review of FSET goals, action steps, and assigned activities. The EP review is a good time for FSET workers to discuss a participant's progress and reinforce positive achievements.

#### **8.1.1 Time Frames for Employment Plan Reviews**

For ABAWDs who are participating in FSET to meet the ABAWD work requirement, the EP must be reviewed at least once every 90 days. For non-ABAWDs and ABAWDs who are meeting the work requirement outside of FSET, the EP must be reviewed at least once every 180 days.

A new EP can be created earlier than the original end date. A new EP should be created when there is a change in ABAWD status. When a change in ABAWD status results in the participant needing to meet the work requirement, FSET workers must contact the ABAWD as soon as possible to create an EP with enough activity hours to meet the work requirement.

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### 8.2 Ongoing Assessment

In addition to regular employment plan (EP) reviews, FSET workers are expected to conduct ongoing assessments as needed with participants. For example, a worker may wish to reassess when a participant has a change in employment or educational attainment, needs to establish new goals and revise FSET activities, requires new FSET supportive services, or encounters new barriers to employment. Ongoing assessment is an important part of FSET case management that ensures that the FSET program is effectively addressing participant employment goals, supportive service needs, and barriers to employment.

The FSET agency is encouraged to employ specialized, industry-standard assessment tools that address the special needs of FSET participants.

When Non-ABAWDs and ABAWDs with a non-TLB referral type do not make progress towards their employment plan goals on a continual basis (6 months or longer), FSET workers should discuss whether the FSET program is meeting their employment and training needs. This conversation should be documented in PIN comments.

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### 8.3 Participant Appointment Scheduling

FSET workers should use the CARES Worker Web (CWW) Client Scheduling Tool to schedule appointments with FSET participants and send them proper notification. FSET workers should attempt to contact ABAWD participants at least once per month until the participant is disenrolled or withdrawn from FSET. Process Help 1.8 has information regarding using client scheduling. FSET appointments may be scheduled using the following activity codes:

Appointment Code	Description
FE	<u>FSET Enroll (Individual)</u> : This code is used to schedule an appointment for individual FSET enrollment and orientation.
FO	<u>FSET Orientation (Group)</u> : This code is used to schedule an appointment for FSET group enrollment and orientation.
FS	<u>FSET Enroll 2nd (Individual)</u> : This code is used to re-schedule an appointment for individual FSET enrollment and orientation when the participant missed the previously scheduled appointment.
FG	<u>FSET Orientation 2nd (Group)</u> : This code is used to reschedule an appointment for FSET group enrollment and orientation when the participant missed a previously scheduled appointment.
FR	<u>FSET EP Review (Individual)</u> : This code is used to schedule an appointment to conduct the regular employment plan review for an ABAWD participant.
FV	<u>FSET EP Review Vol. (Individual)</u> : This code is used to schedule an appointment to conduct the regular employment plan review for a non-ABAWD or an ABAWD meeting the work requirement outside of FSET.
FW	<u>FSET Workshop (Group)</u> : This code is used to schedule an appointment to attend an FSET workshop group activity.
FP	<u>FSET Participation (Individual)</u> : This code is used to schedule an appointment with the FSET agency to discuss FSET participation with the participant.

In the CWW Client Scheduling Tool are five automated FSET letters, which correspond to FSET-specific activity codes, and are automatically generated when appointments are scheduled. Details regarding appointment correspondence can be found in Process Help 1.8.9. These letters are as follows:

Correspondence Code	Description
CSLW	<u>Initial Enrollment Appointment</u> : This letter is used to notify an individual that an initial enrollment appointment has been scheduled. The letter corresponds to activity codes FE FSET Enroll (Individual) and FO FSET Orientation (Group).

CSLV	<u>Reschedule Enrollment Appointment:</u> This letter is used to notify an individual that their initial enrollment appointment has been rescheduled because he or she missed the prior enrollment appointment. The letter corresponds to activity codes FS FSET Enroll 2nd (Individual) and FG FSET Orientation 2nd (Group).
CSLX	<u>Employment Plan Review:</u> This letter is used to notify a participant that an appointment has been scheduled for an employment plan (EP) review. The letter corresponds to activity codes FR FSET EP Review (Individual) and FV FSET EP Review Vol. (Individual).
CSLZ	<u>Employment Workshop:</u> This letter is used to notify a participant that he or she is registered to attend an employment workshop. The letter corresponds to activity code FW FSET Workshop (Group).
CSLO	<u>Participation Appointment:</u> This letter is used to notify a participant that an appointment has been scheduled to review his or her participation in FSET. The letter corresponds to the activity code FP FSET Participation (Individual).

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## **8.4 Referral Transfers**

### **8.4.1 Referral Transfers within an FSET Region**

Within an FSET region, referrals in 'referred' and 'enrolled' status may be transferred between workers and FSET offices, as necessary. An FSET participant may be served by any office within the region in which they reside. When transferring a referral to another worker or office within the FSET region, it is not necessary to end FSET activities or supportive services prior to the transfer.

### **8.4.2 Referral Transfers to a New FSET Region**

When an individual referred to or enrolled in FSET moves to a new FSET region, CARES Worker Web (CWW) does not generate or send notification to the individual that services will be provided by a new FSET region. When the current FSET agency is notified about an individual's move to a new FSET region, it is the responsibility of that FSET agency to close out any assigned activities and supportive services and transfer the referral to the new FSET region. The participant should not be disenrolled from FSET prior to being transferred to the new FSET region.

The new FSET region is responsible for initiating contact with the transferred individual within five days of receipt of the transfer. Timely contact is crucial, especially for ABAWDs who are referred to or enrolled in FSET as a means to meet the work requirement and maintain FoodShare eligibility.

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## 8.5 Disenrollment

FSET disenrollment is completed on the Participant Summary page in the CWW FSET Tool. The primary reasons for disenrolling a participant from the FSET program include:

1. A participant met the work requirement by obtaining unsubsidized employment for 80 hours per month, has been verified to be an ABAWD with a non-TLB referral, and chooses not to participate in FSET. Disenrollment should not occur while a participant is receiving job retention services for a job obtained as a result of participating in FSET. A participant is eligible to receive up to 90 days of job retention services through FSET even if he or she is no longer eligible for FoodShare.

If an FSET participant loses FoodShare eligibility, the FSET agencies must not disenroll FoodShare ineligible participants until on or after the sixth (6th) day of the month following the month FoodShare closed. On the referral update, the effective date displays the date FoodShare eligibility ends. Disenrollment of a FoodShare ineligible participant must be completed no later than the last day of the month following the month FoodShare eligibility was lost and FoodShare closed. Information in CARES Worker Web (CWW) may show that FoodShare is scheduled to close because the FoodShare interview or other requirements were not completed prior to adverse action. FoodShare may reopen within the same month or the following month.

2. Non-ABAWDs and ABAWDs with a non-TLB referral type who have not participated in FSET for two months without good cause. Non-participation is defined as a complete lack of contact from the participant to the FSET agency. Non-ABAWDs and ABAWDs with a non-TLB referral type who participate fewer than 12 hours per month are considered to be participating in the FSET program and should not be disenrolled without their consent. This disenrollment reason does not apply to ABAWDs with a TLB referral type.

Prior to disenrolling a non-ABAWD or an ABAWD with a non-TLB referral type for non-participation, the worker must attempt to make contact by letter or telephone to determine why the individual is not participating and to determine if the employment plan (EP) should be revised to include different services.

3. Non-ABAWDs or ABAWDs with a non-TLB referral type requests to end services. This disenrollment reason does not apply to ABAWDs with a TLB referral type.

**Note:** FoodShare will be systematically scheduled to close at adverse action when required action for a review or Six Month Report Form (SMRF) was pending action, including pending verification. If the member completes the necessary action to reopen FoodShare benefits, an updated referral will be sent to the FSET worker showing that the participant is again eligible.

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## 9 FSET PROGRAM ADMINISTRATION

### 9.1 Confidentiality

Except as stated below, no one may, for any purpose not connected with program administration, use or disclose information about current or former FSET participants.

The Department of Health Services (DHS), Department of Workforce Development (DWD), Department of Children and Families (DCF), and agency contractors may disclose information from the agency record to other programs routinely and without the person's consent for a purpose compatible with the data's collection, such as coordinating activities, collaborating on services, and verifying participation. This includes the following compatible agencies:

- Income maintenance (IM) consortia or county departments of social or human services
- DHS-contracted county, tribal, and private agencies
- Wisconsin DCF staff for administering work participation requirements
- DWD, Division of Unemployment Insurance (DUI) for computer matching to Unemployment Insurance benefit payments
- Persons directly connected with the administration or enforcement of the programs which are required to participate in the state income and eligibility verification system (IEVS), to the extent that the information is used to establish or verify eligibility or benefit amounts under those programs
- USDA Food and Nutrition Service

No other routine disclosure from participant records is approved. The participant must authorize all other disclosures. A participant may authorize the disclosure of information of record about him or herself to a third party. This requires the participant or guardian's written authorization. The Confidential Information Release Authorization and Confidential Information Release Authorization to Agency forms may be used for this purpose. The authorization must specify the information to be disclosed, to whom it is to be disclosed, and for what period of time.

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## 9.2 Records Retention

Digital versions of case records are as valid as paper copies. Agencies are not required to retain paper copies if the document has been scanned in the electronic case file (ECF) or another scanning system. See the ECF Handbook for more information on the ECF and scanning. All new FSET-related documents must be scanned within 30 days after receipt. Documents scanned and stored in the ECF are backed up regularly and stored off site. Documents stored in the ECF may be printed or copied digitally if necessary.

Paper documents that are scanned and stored in the ECF may be destroyed at any time. This includes copies of birth certificates, Social Security cards, marriage certificates, etc. Original documents must be returned to the owner. If your agency is unable to return original documents (such as check stubs) to members, do not destroy the originals. Keep them in the paper case folder until they can be returned. Documents that are turned in and are not expected to be returned (i.e. photocopies) can be destroyed after scanning in the ECF.

After scanning, the Department of Health Services (DHS) recommends storing the paper documents for at least one week in case a scanner operator error is discovered. If that happens, the document should be rescanned. Some documents are restricted and can only be viewed by the immediate caseworker and his or her supervisor. If documents appear to be missing, check to make sure the case is not restricted and the documents not visible before rescanning.

Agencies must retain paper case documents for three years after the case closes if the documents are not scanned. However, paper case documents must be retained for longer than three years if any litigation, claim, or audit is unresolved. In these cases, do not purge the case until three years from when the issue(s) have been resolved. The terms "litigation," "claim," and "audit" include but are not limited to lawsuits, fair hearings, Intentional Program Violation (IPV) claims, federal or state Quality Control (QC) audits, Legislative Audit Bureau (LAB) audits, etc.

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### **9.3 Correcting an Agency Error**

If an agency error caused a time-limited FoodShare benefit (TLB) or an additional month to be applied to an FSET participant's clock incorrectly, the FSET or the income maintenance (IM) agency should work with the consortium staff to correct the error. Document in case comments the steps the agency took to resolve the issue. Once the error is discovered it should be resolved within five business days.

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## 9.4 Managing Fraud, Waste, and Abuse

FSET agencies should match supportive services to the activities in which the participant is involved. FSET agencies are required to provide payment to FSET participants for expenses that are reasonable, necessary, and directly related to participating in assigned FSET activities. Federal regulations allow payment to be provided as a reimbursement for expenses incurred, or in advance as payment for anticipated expenses in the coming month.

If an FSET agency suspects or has knowledge that a participant is using supportive services for something other than an FSET activity, or is trading or selling supportive services the following steps should be taken:

1. The FSET agency must discuss the matter with the participant.
2. If it is determined that the participant intentionally or unintentionally misused FSET funds, the participant must be notified in writing that they will only receive reimbursement for expenses that are reasonable and necessary, and directly related to completing assigned activities, after documentation of the expense is provided. FSET workers will seek supervisory approval prior to providing written notification to the participant. A copy of the written notice must be scanned into the Electronic Case File (ECF)
3. The participant must be informed that they are allowed to file for a fair hearing if they do not agree with this decision.
4. Details of the steps taken to resolve this issue and the outcome must be documented in PIN comments.

There is no means to recoup issued supportive services. If the FSET agency is notified that the IM agency is recouping a future month's benefits, the FSET agency should not issue supportive services in that month.

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## 9.5 Fair Hearings

An FSET participant has the right to file a fair hearing if he or she disagrees with an action taken by an FSET agency. A fair hearing must be requested within 90 days from the day FoodShare benefits were impacted by a specific action taken by the FSET or IM agency. The fair hearing is heard before an Administrative Law Judge (ALJ), administered by the Division of Hearing and Appeals (DHA). The ALJ determines whether or not the actions taken by the agency were correct, per federal regulations, state statutes, and program-specific policies. The burden of proof is on the agency that took adverse action against the member.

Fair hearing requests may be made in the following ways:

- Received by the IM and/or FSET agency in writing
- Received by the IM and/or FSET agency verbally
- Received by DHA verbally or in writing

All hearing requests must be forwarded to DHA. DHA schedules the hearings upon receiving the request. The FSET agency may assist the participant with submitting the Request for Fair Hearing form to DHA. The FSET worker must provide the participant with the Request for Fair Hearing form upon request, direct the participant to his or her personal FoodShare Notice of Decision, and/or direct the participant to contact his or her IM worker for further clarification. The FSET agency must also attempt to reach the IM agency to request that the FoodShare Notice of Decision be explained to the participant.

DHA contacts the income maintenance (IM) agency when a fair hearing has been scheduled. The IM agency will then notify the FSET agency that the FSET participant has requested a fair hearing. Communication and coordination between the IM agency and the FSET agency is important to facilitate this process. The FSET and IM agencies should work together to determine internal processes for sending and receiving information related to fair hearings, in particular the designated individuals responsible for receiving fair hearings communications within both the FSET and IM agencies. FSET agencies must attend and provide applicable documentation at fair hearings and in advance of the hearing. FSET agencies must comply with requests to attend fair hearings made by IM agencies in cases where FoodShare eligibility was impacted by FSET agency action or inaction. It is recommended that the FSET agency representative and IM agency representative who will be attending the hearing have a pre-hearing preparation meeting together to review the relevant case information.

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## 10 APPENDIX

### 10.1 Appendix A: FSET Definitions

**Employer:** One who offers and provides work to another person. The employer can be an owner, proprietor, corporation, agency, or organization.

**Employment:** Commonly defined as work performed for pay.

**Entered Employment (EE):** A term used by work programs to credit the agency for assisting the individual in obtaining unsubsidized employment. Commonly referred to as an EE. See FSET Handbook 7.1.2 Entered Employment for more information on entered employment criteria for FSET.

**Full-time employment:** Employment that is unsubsidized and that averages 30 or more hours per week when the wages are at least equal to the legally established minimum wage for the job held.

**Gross pay:** Wages before any deductions are made. Some jobs are categorized under the state minimum wage laws while others are under the federal minimum wage laws.

**Part-time employment:** Employment that is unsubsidized and that averages less than 30 hours per week when the wages are at least equal to the legally established minimum wage for the job held.

**Self-employment:** A self-employed person earns income directly from his or her own business. Self-employment is considered an Entered Employment if it meets the criteria of an Entered Employment. Self-employment must also meet definitions of UF (Unsubsidized Full-Time) and UP (Unsubsidized Part-Time) to be an Entered Employment. See FSET Handbook 10.3 Appendix C: FSET Fundable Component Activities for a description of UF and UP codes.

**Subsidized employment:** Employment for which the employer is reimbursed for employing and/or training a worker.

**Temporary agency (also known as staffing agency or employment agency):** An agency that hires individuals to fulfill the employment needs of various employers for a limited time period. The agency pays wages to individuals while they work at different work sites and is therefore the employer of record. If the initial job assignment with the temporary agency meets the definition of an Entered Employment, the Entered Employment should be reported in CWW using the temporary agency as the employer.

Subsequent job or site changes while still employed by the temporary agency do not count as another Entered Employment.

**Temp to perm placements:** An employment hire resulting from an employee who was placed in a job by a temporary agency and subsequently being hired by that employer into a (permanent) job with that employer. Temp to perm hires may be counted as an Entered Employment.

**Unsubsidized employment:** For the FSET population, unsubsidized employment is a job in which no public money goes toward paying salaries.

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## 10.2 Appendix B: FSET vs IM Agency Responsibilities (Side-By-Side)

### FoodShare ABAWD/FSET Roles and Responsibilities

Action	IM Agency Role	FSET Agency Role	Correspondence
Determine FoodShare eligibility and send referrals for Able-Bodied Adults Without Dependents (ABAWDs) and non-ABAWDs to the FoodShare Employment and Training (FSET) agency after FoodShare confirmation	X		Case Summary  Eligibility Notice of Decision  Referral to the FoodShare Employment and Training (FSET) Program
Determine ABAWD status and collect verification of claimed exemptions	X		FoodShare WR/ABAWD VCL
Review FSET referrals, complete enrollment, and provide clear guidance of participant expectations		X	FSET Initial Appointment Letter
Create an employment plan with participants and provide ongoing case management of FSET participation		X	Employment Plan Summary Various Appointment Letters
Track ABAWDs' participation weekly within the CARES Worker Web FSET Tool and ensure final monthly participation is entered timely		X	
Complete FoodShare renewal	X		45-Day Renewal Notice Notice of Decision
Send updated FSET referrals when changes in FoodShare eligibility or ABAWD status are confirmed	X		
Disenroll participants from FSET		X	FSET Disenrollment Letter
Scan relevant documents into the electronic case file (ECF)	X	X	

Maintain open communication between Income Maintenance (IM) and FSET Agencies	X	X	
Attend and prepare documentation for Fair Hearings	X	X	

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### 10.3 Appendix C: FSET Fundable Component Activities

Code	Description	Details
A1	Post-Secondary Ed. – Two Years or Less	Assign this activity for educational courses with an industry-recognized credential that can be completed in two years or less. This typically includes short-term certificates or diplomas that may be earned through a local technical college. Count the number of hours the person is in the classroom and up to one hour of unsupervised study time for each hour of class time. Supervised study time may also be assigned under this activity. A statement from the educational program indicating that an additional amount of study time may be required to successfully complete the course can be included in the assigned number of hours.
BE	Adult Basic Education	Assign this activity to participants who are engaged in an adult basic education course or literacy skills courses in the areas of reading, mathematics, communication skills, social studies, physical sciences, and health. Count the number of hours the person is in the classroom and up to one hour of unsupervised study time for each hour of class time. Supervised study time may also be assigned under this activity. A statement from the educational program indicating that an additional amount of study time may be required to successfully complete the course can be included in the assigned number of hours.
CE	Career Planning	Assign this activity if participant is receiving services to evaluate their career interests, guide the career planning process, or advance their career, as long as the participant has a realistic and viable goal. Examples include: career exploration, job shadowing; evaluations for aptitude, skills, reviewing labor market information and training opportunities; and career guidance and counseling.
CS	Community Service	Assign this activity if participant is engaged in service hours done for the benefit of the public or its institutions. This activity is set up by the participant or another organization outside of FSET.
DR	Driver's Education	Assign this activity when a participant is enrolled in a course of study that includes both classroom and behind-the-wheel instruction designed to prepare the student to pass the Wisconsin Driver's License Examination.

EL	English as a Second Language	This activity may be assigned to participants enrolled in English as a Second Language (ESL) course or trainings and activities meant to prepare participants for ESL courses. This code can be used when someone is enrolled in literacy classes that assist with their ability to read or write. Count the number of hours the person is in the classroom and up to one hour of unsupervised study time for each hour of class time. Supervised study time may also be assigned under this activity. A statement from the educational program indicating that an additional amount of study time may be required to successfully complete the course can be included in the assigned number of hours.
EO	Enrollment with Orientation	Use this code for individuals who participate in a set of activities designed to orient and enroll the individual into the FSET program.  Assign this activity if a participant is participating in a non-qualifying activity for ABAWDs, unless it makes up less than half of an ABAWD's total monthly FSET participation hours.
ES	Supervised Employment Search	Assign this activity to participants engaged in employment search that is tailored to individual needs, such as 1) time used to research prospective employers; 2) making contact with prospective employers to learn of job openings, whether by phone, in person, or via the internet; 3) completing applications for job vacancies; 4) preparing for job interviews; 5) interviewing for jobs; and 6) workshops on effective job seeking and interviewing skills.  This is a non-qualifying activity for ABAWDs, unless it makes up less than half of an ABAWD's total monthly FSET participation hours.
HE	High School Equivalency Diploma or GED	Assign this activity for participants who are receiving instruction and study time designed to prepare for the tests of General Educational Development (GED) or High School Equivalency Diploma.
JR	Job Retention	Job retention can be provided for up to 90 days to an individual who has secured employment after enrolling in FSET. In most cases the individual is not participating in other FSET components or assigned activities. Job retention services may include: 1) job retention reimbursement; 2) reviewing workplace demands and employer expectations; 3) strategies to help the

		individual stay employed; 4) job-specific problem solving; and 5) crisis resolution.
JS	Job Skills Training	Assign this activity when a participant is enrolled in a training arranged to meet the specific needs of an employer or a general training that prepares an individual for a specific occupation within a particular employment sector where they will not earn an industry recognized credential. The training will provide skills to help the participant obtain employment or to advance or adapt to the changing demands of the workplace. Count the number of hours the person is in the training and up to one hour of unsupervised study time for each hour of training time. Supervised study time may also be assigned under this activity. A statement from the training program indicating that an additional amount of study time may be required to successfully complete the training can be included in the assigned number of hours.
MO	Job Readiness/ Motivation	<p>Assign this activity to participants engaged in classes and activities specifically designed to prepare them for work. Activities are geared toward learning general workplace expectations, work behavior and skills necessary to compete successfully in the labor market. A high-quality job readiness program uses various techniques and approaches to build self-esteem and increase self-confidence. Activities may include: 1) instruction in workplace expectations (including instruction on appropriate attire); 2) workshops on self-esteem, goal setting, etc.; and 3) courses on basic computer skills and use of internet. Job readiness activities may be completed independently or in a group setting.</p> <p>If an individual is enrolled in a comprehensive job readiness program curriculum, as long as the intent of the component is met, it can include additional activities, such as financial literacy, household management techniques, and assistance with other life skills, that help an individual's circumstances so they are a better able to obtain or maintain employment.</p>
SE	Self-Employment	Assign this activity when a person is involved in a self-employment training or individualized technical assistance program. In general, individuals assigned to this component have sound business ideas but lack the skills to successfully create and implement a plan for successful self-employment. Participants receive help to

		develop their business, create sound financial and marketing plans, access grant and local self-employment funds and provide other business support services.
SF	Full-Time Employment: Subsidized	Assign this activity when a participant is employed or self-employed in a subsidized position full-time (30 or more hours per week).
SP	Part-Time Employment: Subsidized	Assign this activity when a participant is employed or self-employed in a subsidized position part-time (fewer than 30 hours per week).
UF	Full-Time Employment: Unsubsidized	Assign this activity when a participant is employed or self-employed full-time (30 or more hours per week).
UP	Part-Time Employment: Unsubsidized	Assign this activity when a participant is employed or self-employed part-time (fewer than 30 hours per week).
WE	Work Experience/W-2	Assign this activity for participants who are job shadowing or learning work skills in an unpaid work experience as part of the W-2 program.
WF	Workfare	<p>Assign this activity to ABAWD-TLB participants. Workfare is a qualifying activity for ABAWDs who need to develop the basic skills and/or work history necessary to enter the job market successfully. FSET agencies should not assign employed participants to workfare. Workfare positions may be established with public or private non-profit employers, such as housing authorities, parks and recreations, and sanitation departments. The goal of workfare is for participants to learn new job skills and establish work references.</p> <p>A household's monthly workfare participation requirement is determined by dividing the FoodShare benefit amount by the minimum wage. FSET agencies should document in PIN comments when the participant lives in a household that includes multiple ABAWDs sharing responsibility for meeting workfare participation requirements.</p>
WJ	Workfare Job Search	Workfare job search may be assigned to ABAWDs during the first 30 days after enrollment at initial certification prior to making a workfare site placement. Workfare job search includes activities outlined in the employment search activity component. The household's workfare hourly requirement is determined by dividing the FoodShare benefit amount by the minimum wage. Workfare participants are considered to



		be participating in and complying with workfare requirements during this 30-day job search period and are meeting the ABAWD work requirement. An FSET participant who has more than one initial certification may be assigned to Workfare job search at each initial certification but cannot be assigned Workfare job search at recertification.
WX	Work Experience/FSET	Assign this activity for participants who are job shadowing or learning work skills in unpaid work experience.

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**10.4 Appendix D: Supportive Services Allowable Expenses**

Item	Almost Always	Sometimes	Never	Other Details
Auto insurance			X	
Auto ownership tag, title, licensing		X		Only if required for FSET participation and no other transportation option is available.
Auto purchase			X	
Auto repairs		X		Only under specific conditions.*
Background checks		X		Only if required for employment and training.
Books	X			
Clothing for job interview	X			
Clothing required for a job		X		Uniforms almost always. Otherwise clothing costs are limited and must be reasonable and necessary for employment as a part of job retention.
Commercial driver's license		X		Only if required for employment.
Computers, laptops, etc.			X	
Course registration fees	X			
Dental work		X		To the extent that it is required for employment and as funds allow for reimbursement. Dental work costs are limited to minor work, such as a cleaning. Major work, such as oral surgery, bridge work, braces, and dentures, are not allowable expenses.
Dependent care costs	X			
Driver license applications and renewal fees		X		Must be reasonable and necessary for participation in an employment and training

				component or employment as a part of job retention.
Drug/alcohol counseling			X	Refer participant to another agency.
Drug tests		X		Only if required for employment.
Equipment		X		Must be reasonable and necessary for participation in an employment and training component or employment as a part of job retention.
Fines			X	No exceptions for any type.
Fingerprinting		X		Only if required for employment.
Gas	X			
Legal services		X		Must be very minor (i.e. notary) and directly related to employment.
Licensing and bonding fees for work or work experience	X			
Living expenses and stipends			X	
Medical expense		X		Only if minor and required for employment, such as a tuberculosis test.
Mental health counseling or treatment			X	Refer participant to appropriate agency.
Relocation expenses		X		Must be reasonable and necessary for employment as part of a job retention component.
Safety items (on the job)	X			
Student activity fees		X		Only if required to participate in class.
Student loans			X	Participants should apply for financial aid.
Taxi driver's license		X		Only if required for employment.

Test fees		X		Must be directly applicable to employment and all other funding sources exhausted.
Temporary housing		X		Housing assistance may be provided on a case-by-case basis for emergency situations, and only when all other funding sources have been exhausted. The rationale for housing assistance must also be documented in PIN comments in the FSET Tool. Housing assistance may be provided for a period of one month maximum per an individual's FoodShare certification period.**
Tools		X		Must be reasonable and necessary for participation in an employment and training component or employment as part of job retention.
Training materials	X			
Transportation expenses (gas, bus fare)	X			
Tuition and fees		X		
Uniforms	X			
Union dues		X		Only if required for employment.
Vision needs (glasses or eye exam)		X		Must be reasonable and necessary for participation in an employment and training component or employment as a part of job retention.

\*Auto repairs may be an allowable expense if all of the following conditions are met:

- The repairs are reasonable and necessary for participation in an approved FSET activity, and
- The FSET volunteer resides in a rural county or area of the state where there is no or very limited public transportation, and
- Carpooling is not a realistic option, and
- Cost estimates are verified from at least two auto repair shops, and

- The title of the auto is registered in the name of the FSET volunteer, and
- The FSET volunteer holds a valid driver's license, and
- The cost of the repairs will not exceed the value of the auto, and
- Repairs are not for cosmetic reasons, and
- Reimbursement is limited to a one-time expense, and
- The agency can guarantee that the repairs cannot be paid by another source.

**\*\*Example 1:** Lenny applies and becomes eligible for FoodShare in January 2019 and maintains eligibility until his next recertification in December 31, 2019. Lenny received temporary housing assistance in May 2019. Lenny would again become eligible for another month of temporary housing assistance on January 1, 2020, the first month of the new certification period.

**Example 2:** Ivy applies and becomes eligible for FoodShare in January 2019 and receives temporary housing assistance in February 2019. Ivy loses FoodShare eligibility in May 2019 and reapplies and regains eligibility in August 2019. Ivy is again eligible for temporary housing assistance after her new application in August 2019.

**Example 3:** Chrissy and her husband, Phil, apply and become eligible for FoodShare in January 2019. Chrissy receives temporary housing assistance in February, 2019. In June 2019 Chrissy loses FoodShare eligibility due to three TLBs while her husband, Phil, remains eligible through December 2019. Chrissy regains eligibility for FoodShare by meeting the ABAWD work requirement in June 2019. Chrissy would not be eligible for temporary housing assistance until January 2020, the first month of the new certification period.

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**10.5 Appendix E: Qualifying Work Programs for ABAWDs**

<b>Qualifying Work Program</b>	<b>Qualifying ABAWD Activities</b>	<b>Hours Required</b>	<b>Funding</b>
Workforce Innovation and Opportunity Act (WIOA) programs	May include job search, job readiness training, occupational skills training, on the job training, adult education and literacy activities, and other employment and training services designed to help participants obtain employment.	80 hours per month, approximately 20 hours per week	U.S. Department of Labor
Programs under section 236 of the Trade Act of 1974	Training programs for workers that have lost or may lose their job.  Example: Dislocated work programs administered through Department of Workforce Development funding.	80 hours per month, approximately 20 hours per week	U.S. Department of Labor
FSET	Basic education, vocational or technical training, on the job training, self-employment planning, work experience and workfare. Job search activities are allowable if job search accounts for less than half of required hours.	80 hours per month, approximately 20 hours per week (except workfare).  Monthly hours for workfare are calculated by dividing a household's monthly FoodShare	Federal Supplemental Nutrition Assistance Program

		allotment by the higher of the applicable federal or state minimum wage.	
Temporary Assistance to Needy Families (TANF) Work Programs	Work programs must be approved by the state. Example: W-2, Tribal TANF, Children First, Transform Milwaukee Jobs Program, TEMP	Participating and complying with any work requirement under title IV of Social Security Act	U.S. Department of Health and Human Services

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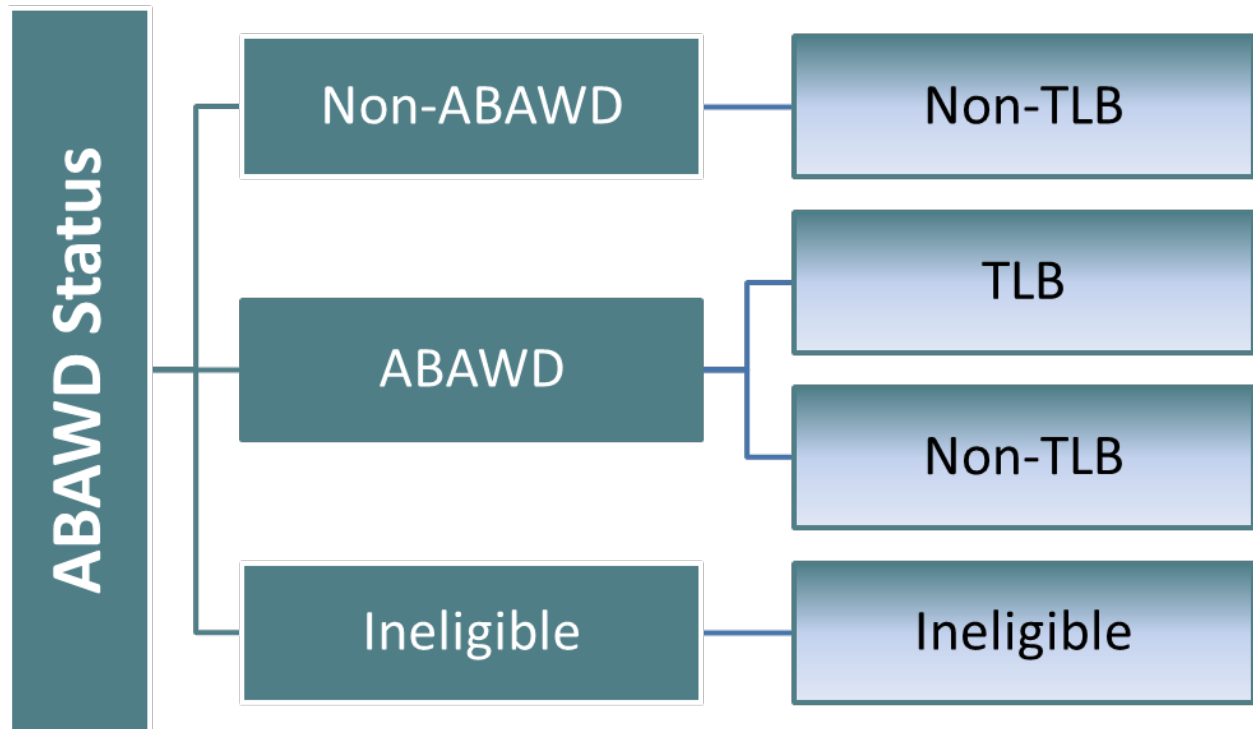
## 10.6 Appendix F: FSET Worker Time Frames

Time Frames	Importance
1st of the month	<ul style="list-style-type: none"> <li>Pull FSET enrollees detail report for expiring employment plans and/or schedule employment plan review appointments.</li> </ul>
5th of the month	<ul style="list-style-type: none"> <li>Update the “Work Requirement Met” field indicating the prior month’s participation.</li> </ul>
6th of the month	<ul style="list-style-type: none"> <li>Begin disenrolling individuals who are no longer eligible for FoodShare as of the end of the prior month.</li> </ul>
No later than the 2nd Saturday of the month	<ul style="list-style-type: none"> <li>Update the “Anticipated to Meet Work Requirement” field.</li> <li>CARES Worker Web (CWW) pulls information from the “Work Requirement Met” field and uses it to update the FoodShare clock.</li> </ul>
Adverse Action	<ul style="list-style-type: none"> <li>CWW pulls information from the “Anticipated to Meet Work Requirement” field and uses it to update the FoodShare clock.</li> </ul>
5 Business Days	<ul style="list-style-type: none"> <li>An FSET participant should be contacted either by letter or telephone within five business days of the FSET agency receiving a referral.</li> </ul>
10 Business Days	<ul style="list-style-type: none"> <li>FSET initial appointments should be scheduled to occur within 10 business days from the date the referral is received (or effective date of FoodShare eligibility, if the referral is sent early).</li> <li>Initial employment plan should be developed at initial appointments.</li> </ul>
12 Calendar Days	<ul style="list-style-type: none"> <li>Workers will be able to preview an appointment letter created within 12 calendar days of the actual appointment, and CWW will send the letter overnight (If letters are created within 13 days of the actual appointment, workers will be unable to view the letter, but the system will automatically send it 12 days before the appointment date).</li> </ul>
2 Months	<ul style="list-style-type: none"> <li>Non-ABAWDs and ABAWDs meeting the work requirement outside of FSET (non-TLB referrals) may be disenrolled from FSET if they have not participated in FSET for two months without good cause.</li> </ul>



	<ul style="list-style-type: none"> <li>FSET workers have up to two calendar months from the FoodShare eligibility end date to override a disenrollment.</li> </ul>
90 Calendar Days	<ul style="list-style-type: none"> <li>FSET participants may receive up to 90 days of job retention services after securing employment through FSET.</li> </ul>
90 days	<ul style="list-style-type: none"> <li>The longest duration of an ABAWD's employment plan. ABAWD employment plans must be reviewed every three months, at minimum.</li> <li>The number of time-limited benefits (TLBs) an ABAWD may receive without meeting the work requirement.</li> <li>The number of additional months an ABAWD may earn after exhausting his or her three TLBs.</li> </ul>
180 days	<ul style="list-style-type: none"> <li>The longest duration of an FSET participant's employment plan. Non-ABAWDs and ABAWDs with a non-TLB referral must have employment plans reviewed every six months, at minimum.</li> </ul>
36 months	<ul style="list-style-type: none"> <li>The duration of an ABAWD's FoodShare clock.</li> </ul>

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**10.7 Appendix G: FSET ABAWD Statuses (and FSET Referral Types)**

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