Wisconsin Works (W-2) Applicant Study
The W-2 Application Process

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INTRODUCTION

In July 2006 the Wisconsin Department of Workforce Development contacted the Institute for Research on Poverty to request a study that would (1) examine the Wisconsin Works (W-2) application process; (2) analyze the frequency of, and possible explanations for, applicant dropouts prior to eligibility determination; and (3) follow the well-being over time of dropouts and their children using available administrative data. It was agreed that the study would focus on Dane County and three W-2 regions in Milwaukee County: Northeast (operated by the YWCA), Northwest (operated by MAXIMUS), and Central (operated by UMOS).

This report describes the first stage of the study, which examines the application process through observations and interviews at the four sites between August 2006 and January 2007. The next report will rely on interviews with a small sample of dropouts and on administrative data from CARES, including case and individual comments and appointment records. That report will quantify dropouts at various application stages at each of the four sites and analyze possible reasons for the dropouts. The final report will discuss the well-being of dropouts as measured by administrative data.

This report relies on site visits, which involved discussions with agency staff about their practices, procedures, policies, and data entry techniques. The site visits also included observations of (a) W-2 orientation sessions, (b) meetings of applicants with Resource Specialists, (c) workshops required of applicants assigned to the Rapid Workforce Attachment process, and (d) first and second meetings between applicants and Eligibility Fops. The report has four sections. Section 1 summarizes some key characteristics of the application process in the August 2006 to January 2007 period, based on the 41 site visits we made during that period. All of our findings are time-specific, because the W-2 agencies are...
dynamic entities. In the two months since the end of our site visits, for example, UMOS has apparently reorganized its staff in ways that could affect the W-2 application process at that agency. Section 2 describes in more detail the application process as it was generally practiced in the four agencies, including the Rapid Workforce Attachment components of the application process that were initiated in 2004. Section 3 describes differences in program implementation among the four agencies. Finally, because this document was, by agreement between DWD and IRP, intended to be a “policy memorandum,” Section 4 offers tentative suggestions intended to address components of the application process for the agencies and applicants. These suggestions are based solely on the observations and staff interviews. Subsequent reports will further test key suggestions in this report as well as offer additional recommendations based on interviews with dropouts and analyses of administrative data.

SECTION 1: SUMMARY CHARACTERISTICS OF THE APPLICATION PROCESS

Our observations and interviews suggested to us three summary characteristics of the application process in the four agencies. First, assignment to the 12-day Rapid Workforce Attachment process appears to be the default assignment, unless the applicant has a child under 12 weeks old, is an 18- or 19-year-old who has not yet graduated from high school, or can show a Resource Specialist clearly valid letters from a qualified professional stating that the applicant has a disability and cannot work. Our expectations at the start of the observations were somewhat different, based in part on Section 5.1.2 of the W-2 manual. That section notes that “applicants who are not considered ready for unsubsidized employment must not be required to conduct an up-front job search.” The section does not define the phrase “ready for unsubsidized employment.” However, it describes, as an example of someone not considered to be job-ready, a woman who “has been repeatedly dismissed from unsubsidized employment positions because of her attendance problems and difficulty taking direction from superiors.” From our rather impressionistic observations, and without the benefits of the actual work history available to W-2 staff from the Unemployment Insurance system as they meet with applicants, applicants with those characteristics seemed to us to be routinely assigned to an up-front job search.
Second, there seemed to us to be relatively little effort at problem solving to help applicants find a job or meet their up-front job search requirements during the 12-day Rapid Attachment process. When applicants had their first meeting with an Eligibility FEP five days into their Rapid Attachment schedule, the sessions seemed to proceed about the same for those who had so far met, and for those who had not met, most of their obligations. For applicants in both situations, the Eligibility FEP reviewed progress to date, and we observed few attempts to review with the less successful applicants how they might at least temporarily rearrange their situations or refocus their job searches—perhaps with W-2 agency help, but even if no such help was available—so that they would have a chance to catch up on their obligations over the seven remaining days of Rapid Attachment. We do not want to overstate this observation, since Eligibility Fops sometimes encouraged applicants to attend agency workshops, like “Dress for Success,” that the FEP thought might benefit the applicant. But we did not observe discussions about, for example, family or neighborhood resources that might be able to provide short-term child care while an applicant applied for jobs.

Third, W-2 agencies face the challenge of having to contend with two forms of error during the application process, and they seem more concerned about one type of error than the other. On the one hand, an agency might fail to place in a cash W-2 tier someone who is not at the time job-ready and should be in such a tier, thereby failing to provide appropriate benefits. In contrast, the agency might place in a cash W-2 tier someone who is job-ready and should not be in such a tier, thereby providing W-2 cash benefits inappropriately. Our observations suggested that W-2 agency staff seem far more concerned about providing cash benefits inappropriately than about failing to provide appropriate benefits.

We are aware that 41 site visits to W-2 agencies do not make us experts on their application processes, and that we might be wrong about one or more of these summary findings. Nevertheless, we offer these suggestions as part of an interim report with preliminary findings that we hope to discuss with DWD staff. Many of these findings may be at least partially tested in later reports. For example, if we are
right that agencies more often fail to provide appropriate benefits to those who are not job-ready than provide inappropriate benefits to those who are, administrative data should show applicants who dropped out of the application process, or otherwise did not attain placement in a cash tier of W-2, who do not succeed in the labor market.

SECTION 2: THE GENERAL APPLICATION PROCESS IN THE FOUR AGENCIES

Figure 1 shows a flow chart of the application process. The remainder of this section provides further detail on each step of the flow.

Initial Application

Participants enter a W-2 agency and proceed to the reception desk, where they request an application for services from the receptionist on duty. The receptionist gives applicants a paper application form which they are asked to fill out, and the applicants sign in to be called back in order of appearance to submit their completed application to the front-desk staff. In filling out the forms, some applicants may only request supportive services such as FoodShare or Medicaid, whereas others report that they wish to apply for W-2, Emergency Assistance, or various program combinations. Once the applicant signs in at the front desk and begins to fill out the form, reception staff query the case in the CARES system. An important component of this query is to assure that the applicant has applied at the correct service region given the address, if any, shown for them in CARES. Applicants who apply at an incorrect agency are called back to the service desk and informed of the appropriate W-2 agency if the address in CARES is correct or told that they will have to contact the County Human Services office to verify a change in their CARES address if that is no longer their correct address. If they are at the wrong W-2 agency for their current address, the staff fill out an interagency form documenting that the applicant applied for services at their site and listing the appropriate agency for the applicant’s address. One copy of the interagency form is kept by the agency, and another is given to the applicant.
Figure 1: Application Process & Drop-Out Points

Initial Application
Application completed and turned in to front desk. Applicant scheduled for both W-2 orientation and Resource Specialist appointment the following day.

Day 1: W-2 Orientation
Applicant attends W-2 Orientation.

Day 1: RS Appointment
Applicant meets with Resource Specialist.

Up-Front Job Search Activities
Rapid Attachment assigned to applicant by Resource Specialist.

Day 2-4: Rapid Attachment
Job search applications, Rapid Attachment workshops, and daily agency check-ins.

Day 5: 1st E-FEP meeting
Applicants meet with E-FEP to assess compliance to date. Further assessment takes place. Applicants that do not secure employment assigned to further up-front job search activities. 2nd E-FEP meeting scheduled for 7 days later.

Day 5-11: Continued Rapid Attachment
Applicants continue with Rapid Attachment requirements until their 2nd E-FEP meeting on the 12th day. Applications, workshops, agency check-ins continue.

Day 12: 2nd E-FEP Meeting
2nd E-FEP meeting to assess applicant compliance. Eligibility determination occurs.

Drop-Out Point 1:
Applicant may either not show for or reschedule their W-2 orientation.

Drop-Out Point 2:
Applicant may either not show for or reschedule meeting with Resource Specialist. Applicant may meet with RS and be determined ineligible or decline services.

Drop-Out Point 3:
Applicant may either not show for or reschedule initial E-FEP meeting. Applicant may decline services. E-FEP may also find that applicant is ineligible with further assessment.

Drop-Out Point 4:
Applicant may either not show or reschedule 2nd E-FEP meeting. Applicant may decline services or be found ineligible, placed in W-2 tier, or offered Case Management only.

Barrier to Work Placement
Barriers to Work (lack of child care, medical restrictions, housing concerns, domestic violence problems, literacy or foreign language deficiencies, probation or parole conflicts, AODA problems, or are under age 19 and currently in high school) preclude applicant’s assignment to Rapid Attachment. If a caretaker of a newborn or a pregnant mother, no up-front job search activities assigned. Further documentation and further assessment for W-2 tier placement. May still be assigned meeting with E-FEP on 5th day.

Applicants may in practice drop-out during the Rapid Attachment period by not completing tasks. However, the official “drop-out” does not occur until they have missed a scheduled appointment.

Further assessment may reveal previously unknown barriers and applicant placed in tier at this time. Applicants not assigned to up-front activities may bring in necessary documentation. Alternatively, may be placed in up-front activities if they do not substantiate Barrier to Work claim.

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Once staff have queried the applicant’s case in CARES and ensured the application is in the correct service region, the applicant is called back to the front to turn in the application. The reception staff member briefly reviews the application to assure that all required information has been filled out. Applicants are then given an appointment to attend a W-2 orientation and Resource Specialist meeting for the next business day or, if the applicant has a previously scheduled obligation for that day, the following business day. In most of our front desk observations, staff reminded applicants to call the agency in advance if they are unable to attend the orientation for any reason.

In several front desk observations, upon receiving an application for services, staff queried applicant cases in CARES for possible problems related to current or past use of FoodShare or child care resources that may impede the W-2 application for the applicant. For example, if an applicant has a sanction in a child care subsidy or FoodShare case, they must resolve this matter prior to being eligible for tier placement. In these observations, the worker informed the applicant of the problem and how it would affect their W-2 application. The receptionist then gave the applicants information concerning where they would need to go to resolve the issue (in most cases the Milwaukee County Human Services building at 12th and Vliet) and the documentation the applicant would need to settle the matter with the County. Although we observed this advice-giving on a few occasions, front desk staff are not required to query an applicant case for other program violations nor inform applicants of any problems. In one discussion with a receptionist, we were told that she queried the case “because it wasn’t too busy that day” and, had the day been busier, she might not have had the time to “dig deeper” and give the applicant detailed information concerning how to resolve the matter with the County.
Day 1: The W-2 Orientation

Applicants arrive at the agency the following morning\(^2\) for the W-2 orientation, which is typically scheduled between 8:30 and 9:00 a.m. Applicants go to the front desk and sign in to document their attendance at the orientation. This is the first juncture at which applicants may drop out of the application process by not showing or calling to reschedule another orientation. After signing in, applicants are told that an agency staff member will come to the lobby area and announce a call for W-2 orientation participants. Agency staff then enter the lobby area and request all applicants who need to attend the W-2 orientation to follow them to a room where the orientation will take place.

The group orientations generally last from 1 to 2 hours. Their precise length depends in part on the size of the group; orientation facilitators tend to field more questions from, and take more time with, larger groups. Each group orientation session has one primary facilitator, although a representative from the county child support agency or another person with relevant expertise may handle selected parts of the orientation. An additional worker may assist the facilitator by disseminating program information pamphlets, community support flyers, and required documents, but the delivery and structure of the orientation appears largely to depend on the main facilitator. Three of the four agencies use at least two primary facilitators to deliver the orientations on a rotating schedule.

All four agencies adhere to common themes in their orientations. For example, agencies typically present an overview of the shift from AFDC to the current W-2 program. In addition, broad program rules of W-2, such as sanctions, time limits, and child support enforcement, are discussed in all agency orientations, although the degree of detail and explanations of the policies vary across sites. Also, in all of the agencies, the rules and goals of the application process are described. Facilitators remind applicants that they are in an application period in which, if they meet requirements, they may become eligible for and placed in a W-2 tier. Some may end up in a cash tier while others may be offered case management.

\(^2\)MAXIMUS, UMOS, and Dane County have morning-only orientations. The YWCA has both morning and afternoon orientations; however, the YWCA sessions are conducted one-on-one rather than in groups.
services. Typically the facilitator refers to Rapid Attachment requirements as required “job search activities” and mentions the “job logs” applicants will need to maintain to document their employment-seeking activities. Facilitators explain that applicants will meet with their assigned Eligibility FEPs twice and that eligibility will be determined at the second meeting.

Facilitators also discuss other requirements of the Rapid Attachment process, although the degree and specificity discussed varies across agencies. All agencies specify required participation hours during Rapid Attachment to the applicant, how each job application counts for a specific number of participation hours, and the number of documented job applications required of each applicant. Facilitators also explain that the number of weekly hours required during the Rapid Attachment process is equivalent to the hours that will be required of them if they are placed in a W-2 tier or find employment.

Supportive services, including FoodShare, Medicaid/BadgerCare, Emergency Assistance, the Workforce Investment Act, and the Job Access Loan, are also discussed at orientations. Brochures and pamphlets describing community supports such as food banks, clothing programs, and housing assistance are distributed. Finally, orientation sessions in agencies that use the Test for Adult Basic Education (TABE) spend some time on the need to take the test if applicants have not done so in the past six months.

Required document signing of medical release forms, Child Support Enforcement forms, forms authorizing the W-2 agency to obtain confidential information, etc., also occurs during the orientation sessions. Three of the four agencies have applicants sign and turn in forms at the beginning or end of the session and go over the documents only briefly. One agency structures much of its orientation session around descriptions and signing of documents.

In all of our observations, applicants were informed of their right to ask questions during the orientation session. Questions that were asked typically concerned individual needs. Some applicants gave examples of personal barriers that might interfere with program requirements. The facilitators often

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3For example, at UMOS each job contact counts for three hours of participation.
tried to answer such questions, but they also generally said that the meeting with the Resource Specialist would be the appropriate place to address individual needs. Upon hearing program rules and supportive services information, some applicants informed facilitators that the information was different from what they had heard at another agency. Descriptions of the qualification guidelines for the Job Access Loan on several occasions prompted this reaction.

At the end of the orientation session, the facilitator typically informs the applicants that they should return to the lobby and wait for their name to be called for their required meeting with a Resource Specialist, although applicants can reschedule their Resource Specialist meeting for the next business day if they have a previous commitment. (Because orientations at the YWCA are one-on-one, the orientations and Resource Specialist meetings occur simultaneously at that agency.)

**Resource Specialist Meeting**

The Resource Specialist meeting directly follows the W-2 orientation sessions. At Dane County, MAXIMUS, and UMOS, this is the second juncture at which applicants may drop out from the W-2 application process, since an applicant may attend the W-2 orientation session but neither stay for the required meeting with a Resource Specialist nor arrange to meet on a different day. Presumably, applicants most likely to leave after the orientation session without making other arrangements are those who hear about requirements or other program policy during the orientation session and decide that W-2 is not at that time suitable for them.

For applicants who attend the meeting with a Resource Specialist, potential outcomes are (1) to be declared ineligible for W-2 owing to income or assets that are too high or lack of custody of a child; (2) to be placed immediately in a W-2 tier; (3) to be assigned no up-front job search activities but scheduled for an initial meeting with an Eligibility FEP; (4) to be assigned up-front job search and other activities and scheduled for an initial meeting with an Eligibility FEP; and (5) to decline W-2 services. In our observations, outcome 4, the assignment of an up-front job search, was by far the most common, followed by outcome 2, immediate placement in a W-2 tier. The most common reason for immediate
placement in a tier applied to applicants who have a child younger than 84 days, who would be assigned a CMC placement. (Applicants who go through orientation and their Resource Specialist meeting late in their pregnancy may fax or mail a birth announcement and be placed in a CMC once the documentation arrives at the agency.)

The most common reason for assignment to an initial meeting with an Eligibility FEP without up-front activities applies to applicants who have a condition or face a situation that impedes their ability to secure employment. Applicants who have a child 84 days or younger, lack child care, have medical restrictions, housing concerns, domestic violence problems, literacy or foreign language deficiencies, probation or parole conflicts, AODA problems, or are under age 19 and currently in high school are sometimes not assigned to Rapid Attachment. In these cases, an applicant may be given until the first scheduled appointment with an Eligibility FEP in five days to acquire the necessary documentation to prove they are in one of these situations (for example, medical documentation, a notice of eviction, a school schedule, or AODA appointments). If the applicant already has documentation at the Resource Specialist meeting, the Resource Specialist may waive Rapid Attachment activities and schedule a meeting with an Eligibility FEP sooner than the 5th day. Applicants who claim one of these conditions but who do not produce documentation at the Resource Specialist meeting may not necessarily be exempted from Rapid Attachment activities; the Resource Specialist may tell the applicant to begin the activities but also to bring the documentation to the first meeting with the Eligibility FEP.

The Resource Specialist discusses a wide range of issues with applicants. In most of our observations, the Resource Specialist and applicant first engaged in an informal discussion, as part of the process of developing an individualized Employability Plan, about the applicant’s employment goals, prior work history, and career interests. The Resource Specialist typically records this information in CARES for other staff to access later in the process. We also observed Resource Specialists assign applicants to specialized workshops, such as a resume seminar, on occasions when the Resource Specialist decided the applicant needed further assistance.
The Resource Specialist moves on to describe and complete the applicant’s Employment Plan and, in most cases, to assign up-front job search activities the applicant must complete and agency workshops the applicant must attend. The Resource Specialist introduces the Employment Plan by reviewing assigned job search activities, as well as scheduled activity days and meetings, including the worker, time, and location of each meeting. The Resource Specialist also explains the “job log” in which applicants are to enter all job applications, and the Resource Specialist informs the applicant of the requirement to document ten applications in the job log by the first meeting with their Eligibility FEP. The applicant is usually allowed to perform five applications online (this includes faxing applications) and five applications in-person. The applicant is usually allowed to perform five applications online (this includes faxing applications) and five applications in-person. The applicant is usually allowed to perform five applications online (this includes faxing applications) and five applications in-person. Applicants are given both a sample job log with satisfactory entries and a blank log they are required to use while documenting their applications.

The Resource Specialist then fills out a document detailing the required number of job applications and the number assigned as in-person or online. Next the Resource Specialist discusses the workshops or resource center activities that are required of the applicant. Applicants are informed they will have to return to the agency to complete resumes, participate in a Rapid Attachment workshop, fill out online job applications, or at least check in at the resource center on days assigned during the time between the current meeting and their first meeting with an Eligibility FEP. The Resource Specialist then gives the applicant an Employment Plan sheet that lists required workshop and/or resource center days along with the amount of time to be spent in each.

The Resource Specialist explains to the applicant that meeting all job search requirements described in the Employment Plan is mandatory and that the first meeting with the Eligibility FEP will assess their compliance at that point. If they do not obtain a job before that first meeting, the Resource Specialist says that they will likely be assigned to similar job search activities before their second meeting.

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4We observed some deviations from the standard assignment of five online and five in-person applications. For example, in one observation involving a visibly pregnant applicant, the Resource Specialist assigned all the job applications as online.

5Agencies vary in the number of workshops assigned, the scheduling, content, and focus of workshops, and what applicants must do while in the resource center.
with the Eligibility FEP. During all of this discussion, the Resource Specialist typically stresses the importance of fulfilling application requirements and of either attending their Eligibility FEP appointments or calling in advance to reschedule if they are unable to attend.

At the end of the meeting, the Resource Specialist typically reviews important dates (required agency check-in days and times, workshops, and Eligibility FEP appointments) with the applicant and reminds the applicant of the required job applications and the importance of showing up for the first Eligibility FEP meeting. The Resource Specialist then organizes all the pages that have been discussed, gives them to the applicant, and usually asks the applicant if they have questions concerning their next few days in the program.

Some applicants ask questions throughout the Resource Specialist session, whereas others ask none at all. Questions typically involve circumstances that, in the applicant’s opinion, will affect their ability to comply with Rapid Attachment requirements. During at least two observations, applicants said they believed the requirements were excessive given their current circumstances. For example, one applicant was facing a housing crisis and felt she had to decide between securing housing and remaining in the W-2 application process. The Resource Specialist did not adjust the assignments. Another applicant who reported a history of depression informed us when the Resource Specialist was out of the room that she thought the agency check-in, workshops, and in-person applications would be too much for her to handle. Applicants also asked about the availability of child care services and were told that they could use the W-2 agency’s child care services when they were at the agency but would have to make other arrangements when they applied for jobs at potential job sites.

Several applicants told their Resource Specialist that they had other appointments, such as with the Social Security office for themselves or a child, that would conflict with requirements during the Rapid Attachment process. Other applicants said they would need to spend time at the County office to handle a FoodShare, child care, or change of address issue. Resource Specialists were generally sympathetic to these concerns, especially those that required a visit to the County office. Staff widely
accepted that these types of appointments would require all-day commitments, or even more, from applicants. W-2 staff would sometimes postpone Eligibility FEP appointment dates if applicants raised these concerns. For example, one Resource Specialist scheduled the first Eligibility FEP meeting past the typical 5th day because the applicant had to take care of a FoodShare sanction, which, the Resource Specialist informed us, would require at least one and probably two full days to correct. In general, we encountered much staff frustration concerning the relationship between W-2 agencies and the County Human Services office.

The “Tentative Recommendations” section, below, includes recommendations that are intended to address some of the concerns expressed by applicants to Resource Specialists.

**Days 2-4: Rapid Attachment**

In all four agencies, the applicant must appear at the W-2 agency on the first workday after meeting with a Resource Specialist for sessions that vary across agencies but which involve some combination of workshop instruction and participation in a resource center in which the applicant can work on job applications individually. The initial focus is often on creating or updating an approved resume followed by instruction concerning online job search resources such as WISCareers and JobNet.

In the Milwaukee agencies, the next two days are primarily check-ins for the applicant. Applicants must come into the agency and sign in at the resource center to document their attendance, typically no later than 9 a.m. Applicants then may use the resource room to apply for employment online, update resumes, or search for job leads, although how long they will spend at the agency on these days is usually determined by each applicant. The expectation of required workshop attendance or applicant resource center use is that the applicant will complete ten job applications, and hopefully find a job, before the applicant’s initial meeting with an Eligibility FEP. Applicants must not only complete the applications to be deemed compliant but also show up and sign in on all required days.
Day 5: Initial Meeting with an Eligibility FEP

The first appointment with the Eligibility FEP is the third measurable juncture at which applicants may be deemed to have dropped out of the application process by not showing up and not rescheduling. Although that meeting generally occurs on the fifth work day after application, exceptions occur, such as for Milwaukee applicants who need to resolve an issue with the County before placement or applicants with other confirmed appointments during the first five days of the Rapid Attachment process.

Eligibility FEPs report that they receive e-mails documenting applicant attendance from staff who run Rapid Attachment workshops and check-ins. Applicants are responsible for bringing their job contact logs to the meeting and are assessed on their fulfillment of the required number of job applications and their attendance at workshops and check-ins. For applicants who largely met requirements, Eligibility FEPs usually offer encouraging words to continue the good work and describe the next week of required participation for the applicant. The requirements usually involve continued daily check-ins with the agency at the resource center and/or workshop attendance. The applicant is also assigned a specific number of job contacts for the next week and is given paper copies detailing any required agency visits, the number of job contacts to be made, and the time, date, and location of the second Eligibility FEP meeting, at which W-2 eligibility will be determined.

The discussions with applicants who have completed a lower percentage of their requirements are not very different—even in cases where the applicant has completed so few requirements that successful application by the end of 12 days of Rapid Attachment is unlikely. Generally, the Eligibility FEPs encourage such applicants to do better and discuss the requirements they will have to meet over the next week. Eligibility FEPs also typically ask why performance during the first five days was substandard. In our observations, typical applicant explanations for failing to meet the first week of requirements involved child care issues, child or maternal health problems, an unforeseen crisis in the family, or a combination of these factors (for example, a child was judged to be too sick to leave at day care). One
applicant said she was “too lazy” to do all the activities, and the FEP responded that she should not say that to a potential employer.

Most applicants are not determined eligible or ineligible for W-2 during the first meeting with an Eligibility FEP. The exception would be for applicants who reported a disability or barrier to work during their Resource Specialist appointment and bring professional documentation to their first meeting with an Eligibility FEP. These applicants could be placed in a W-2 Transitions tier at this point, although we did not observe such placements at this stage of the process.

Days 6–11: Continued Rapid Attachment Requirements

Applicants continue with Rapid Attachment job search activities during this period. As in the first five days, they must come to the agency on most days to sign in and utilize the resource center to fulfill required job search activities. Based on the Eligibility FEP’s assessment of what will make the applicant a stronger candidate for a job, Eligibility FEPS may also assign or encourage applicants to attend other workshops during this period. Examples of workshops to which applicants may be assigned include “Dress for Success” and “In-Person Interviewing Seminar.” If applicants are assigned rather than just encouraged to attend a workshop, attendance at the workshop is counted toward compliance at the second Eligibility FEP meeting.

Day 12: 2nd Eligibility FEP Meeting: Eligibility Determination

This is the fourth and final juncture at which applicants may be counted as having dropped out of the application process. Some applicants may attend their initial Eligibility FEP meeting but not the second one at which eligibility is determined. When that happens, Eligibility FEPS express in interviews a belief that the likely reason is that the applicant found a job, although staff do not usually know that for certain because agencies do not officially track the employment of applicants during the Rapid Attachment process. As is the case before the first meeting with an Eligibility FEP, applicants may have unofficially dropped out before the second meeting by not attending required check-ins or workshops or
not making all required job contacts, but an applicant is only officially counted as having dropped out by not attending the scheduled appointment with the Eligibility FEP.

As is true of the first meeting, many applicants who attend the second meeting have not fulfilled all Rapid Attachment requirements. Eligibility FEPs assess the degree of conformity with the requirements by assessing how many job contacts the applicant documented and whether the documentation logs include all required information, including contact persons, locations, and phone numbers. Based on e-mails from staff responsible for Rapid Attachment workshops and resource center check-ins, Eligibility FEPs assess attendance at required appointments in the W-2 agency.

After assessment of applicant participation, possible outcomes are (1) the Eligibility FEP may deny the applicant eligibility owing to noncompliance with the requirements of Rapid Attachment; (2) the Eligibility FEP may find the applicant ineligible for other reasons, such as income or noncooperation with child support; (3) the Eligibility FEP may determine the W-2 tier in which the applicant will be placed; or (4) the applicant may decline services. In our observations, the typical tier placement for applicants who have sufficiently complied with Rapid Attachment assignments, but have not found employment, was a CSJ placement. For applicants placed in this tier, the Eligibility FEP explains the required hours involved, tells the applicants where they should report to begin their CSJ work, makes a first appointment for the applicant with an Ongoing FEP, and explains that the applicant must see that FEP at least every 30 days. The information is transmitted both verbally and in paper format.

Applicants may also be placed in a W-2 Transitions tier at the second Eligibility-FEP meeting. Although we did not observe such a placement at this juncture, applicants may provide required medical documentation at this point, or further assessment may lead the Eligibility FEP to determine the applicant has barriers that were not previously documented.

Applicants may also receive a Case Management Only placement, which most typically occurs for applicants who completed Rapid Attachment satisfactorily but did not find employment and have one
of two characteristics: a work history that is long enough and recent enough to suggest they have no barrier to work, or limited months left on their CSJ or W-2 Transition time clocks.

We also observed applicants who declined services at the second meeting with their Eligibility FEP. Some applicants who found employment came to their second Eligibility FEP appointment to inform the worker that they had obtained employment or to explore supportive services such as child care and transportation. Applicants may also decline services if they are dissatisfied with the tier placement offered to them at the meeting.

Applicants who failed to meet enough of their Rapid Attachment requirements, in the judgment of the Eligibility FEP, may be denied tier placement in this meeting. Those denied tier placement for this, or any other, reason are informed of their rights to reapply or to appeal.

SECTION 3: DIFFERENCES IN AGENCY PRACTICE

Although the application process is broadly similar in the four agencies, we observed some distinctions in agency practice that may affect eligibility determination. Figure 2 summarizes the differences we observed, and the remainder of this section provides further details concerning the differences.

Agency Application Documents

All agencies require applicants to complete, upon entry to the agency, an application document that signals an interest in applying for services. Dane County, MAXIMUS, and UMOS have documents that are one- to two-pages long and ask for basic demographic information and perceived program needs. In contrast, the YWCA uses an eight-page document that asks for information on personal circumstances, past work and family history, and applicant goals and dreams, in addition to basic demographic and program needs information.
**Figure 2: Differences in Agency Practices**

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<th>Dane County</th>
<th>MAXIMUS</th>
<th>UMOS</th>
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<td><strong>W-2 Orientation</strong></td>
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<td><strong>Goals</strong></td>
<td>Discuss broad program goals and requirements.</td>
<td>Emphasize benefits of employment. Compare and contrast financial well-being of employment versus cash assistance receipt.</td>
<td>Focus on explanation of required documents. Collect signatures on required documents.</td>
<td>Discuss broad program goals and requirements.</td>
</tr>
<tr>
<td><strong>Resource Specialist Meeting</strong></td>
<td>---</td>
<td>---</td>
<td>---</td>
<td>---</td>
</tr>
<tr>
<td><strong>Rapid Attachment &amp; Workshops</strong></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td><strong>Orientation</strong></td>
<td>No formal orientation to Rapid Attachment.</td>
<td>Detailed description of RA expectations, requirements, and job search documentation prior to workshop attendance.</td>
<td>No formal orientation to RA.</td>
<td>No formal orientation to RA.</td>
</tr>
<tr>
<td><strong>Goals</strong></td>
<td>Highly structured and focused on job search activities. Applicants spend bulk of time performing job search activities.</td>
<td>Basic skills exams, job search activities.</td>
<td>Focus on soft skills. Review of proper application and interview techniques. Videos on soft skills reviewed. Some job search activities at end of session.</td>
<td>Basic skills exams, job search activities.</td>
</tr>
</tbody>
</table>

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6 All agencies use orientation sessions, irrespective of structure, to discuss broad program goals, work requirements, develop resumes, and complete required documentation. The degree and specificity vary across sites and facilitators. The differences listed are those that make agency practices unique.

7 No systematic differences observed.
**Figure 2 (continued): Differences in Agency Practices**

<table>
<thead>
<tr>
<th></th>
<th>Dane County</th>
<th>MAXIMUS</th>
<th>UMOS</th>
<th>YWCA</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Scheduling</strong></td>
<td>Monday, Tuesday, and Thursday from 9–11:15am.</td>
<td>Monday-Friday from 9–11am.</td>
<td>Scheduled on Tuesday and Wednesday from 1-4pm.</td>
<td>Monday-Friday from 9am–1pm.</td>
</tr>
<tr>
<td><strong>Agency Check-In</strong></td>
<td>No required agency check-in. Participants required to attend workshop 3 days per week.</td>
<td>Check in required from 9-10am. Applicants must submit prior day’s job log. Applicants are not required to stay.</td>
<td>Check in required from 9-10am. Applicants are not required to stay.</td>
<td>Check in required from 9-10am. Applicants are not required to stay.</td>
</tr>
<tr>
<td><strong>Job activities assessment</strong></td>
<td>Assessed over the initial 5-day period with E-FEP. RA staff inform workers of attendance and compliance.</td>
<td>Assessed daily. Applicants must submit job logs at agency check in.</td>
<td>Assessed over the initial 5-day period with E-FEP. RA staff inform workers of attendance and compliance.</td>
<td>Assessed over the initial 5-day period with E-FEP. RA staff inform workers of attendance and compliance.</td>
</tr>
<tr>
<td><strong>Continued Rapid Attachment</strong></td>
<td>Attendance to Rapid Attachment workshops. Off-site job searches.</td>
<td>Daily agency check-in and daily job log submission. May choose to use resources for job search activities.</td>
<td>Daily agency check-in. May choose to use resources for job search activities.</td>
<td>Daily agency check-in. May choose to use resources for job search activities.</td>
</tr>
<tr>
<td><strong>2nd E-FEP Meeting</strong></td>
<td>May extend 12-day application period if applicant has not adequately complied. Applicants participate in another week of job search activities.</td>
<td>Generally does not extend application period due to noncompliance. Placement decision made.</td>
<td>Generally does not extend application period due to noncompliance. Placement decision made.</td>
<td>Generally does not extend application period due to noncompliance. Placement decision made.</td>
</tr>
</tbody>
</table>

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8 All agencies have applicants perform a job search and review job openings.

9 Applicants receive information on the RA process and workshops at their meetings with Resource Specialists. They may also receive informal information during the RA workshop itself.

10 No substantive differences in fundamental purpose of the meeting across agencies.

11 All agencies continue with requirements similar to those during first 5 days of the application process.
The Orientation Session

The four agencies operate their orientations somewhat differently and may have slightly different goals. MAXIMUS and UMOS use group orientations. The YWCA employs a one-on-one orientation approach that may be likened to an extended Resource Specialist meeting in which a brief introduction to program rules and goals starts the session. Dane County employs a hybrid model in which portions of the orientation are conducted in both group and individual formats. All agencies discuss broad program goals and work requirements in the orientation, but the degree and specificity vary. For example, UMOS briefly describes the broad program goals, rules, and requirements of W-2, and spends much of the orientation session time reviewing and obtaining signatures on documents that applicants must sign. In contrast, MAXIMUS staff spend little time processing forms during the orientation and instead allow applicants to sign documents at the end of the session and leave explanation of the documents, if applicants are interested in an explanation, to a Resource Specialist. MAXIMUS largely uses its W-2 orientation to go over detailed tier placements and the likelihood of applicants being placed in each tier, and to focus on the advantages of employment over cash assistance as a means to financial well-being.

Orientations also varied in the degree to which facilitators described the recently changed child support pass-through policy. All agencies handed out brochures that offered explanations of the policy change along with the schedule of changes in withholding percentages. Some facilitators spent quite a bit of time going over the shift and offering explanations of why the policy had been altered.

Each agency that offers group orientations has more than one facilitator, and we observed some differences among the various facilitators even within agencies. For example, facilitators differed in their explanations of why the pass-through policies had changed, and they also differed in their explanations of who could qualify for a Job Access Loan. Facilitators also differed somewhat in their overall tone. Most presented W-2, and a decision to apply for it, neutrally, but some made statements about the motivation of applicants, applicant family circumstances, and the likelihood of applicants’ compliance that seemed to
question the desire of applicants to obtain and sustain employment. The report offers tentative recommendations, below, that may address these differences.

The Resource Specialist Meeting

Despite the differences in material covered in orientations, we did not observe systematic agency differences in the roles of Resource Specialists.

Rapid Attachment Workshops

Rapid Attachment workshops vary across agencies in both purpose and practice. UMOS uses the workshops as a means of soft skills introduction, with some job search and resume building at the end of the workshop. Dane County focuses solely on job search activities such as online applications, phone inquiries, and faxing resumes, and provides no structured soft skill training, formal or informal, during the workshops. MAXIMUS and the YWCA both contract with PSI to perform the workshops, which for both agencies require applicants to first take basic skill and interest tests and then perform job search activities and resume building during the workshop. MAXIMUS workshops differ from those provided at the YWCA in one respect. At MAXIMUS, the initial 20 minutes of the first workshop is devoted to a brief but explicit introduction to the Rapid Attachment process.

The first workshop/resource center day varies most across agencies. UMOS uses both the first and second days primarily in a classroom setting. Applicants watch DVDs on interview techniques, and the facilitator reviews what an appropriate job application should look like. The facilitator may also go over job leads with applicants during this time. Only at the end of the first session do applicants go to a resource center area to work independently to search for employment online or update resumes. In contrast, other agencies devote much of the first day of Rapid Attachment to independent activity in the resource center, including sessions in which applicants take tests of basic skills and interests online.

Our observations suggest that in only one agency were the requirements of Rapid Attachment clearly spelled out in an introductory workshop. In that case, the orientation presenter explicitly described
expectations, rules, and requirements of specific job-search activities. The worker reviewed what counts as a job contact, what specific information needed to be in the contact log, and what kind of confirmation pages for both faxed and online applications would have to be printed and provided to the Eligibility FEP. The orientation presenter also provided an easy-to-follow checklist sheet. Applicants at other agencies may only receive bits and pieces of information about Rapid Attachment in a variety of agency contacts and may never hear in one place the precise job search documentation requirements. Part of the difficulty of conveying this information is that the Rapid Attachment workshops are provided by the Job Development and Placement Agencies (JDPA) in Milwaukee County and by a contract agency in Dane County. The focus of the workshop is how to find a job, not how to document efforts to find a job in ways that Eligibility FEPs will understand and accept. The one Rapid Attachment orientation that seemed clearest about the documentation requirements happened to be presented by a JDPA worker who had previously been a FEP in a W-2 agency.

Agency Check-In

Only one agency does not employ a mandatory check-in during the Rapid Attachment process. Dane County holds three Rapid Attachment workshops per week (Monday, Wednesday, and Friday) but does not require applicants to show up and sign in on the other days. The other three agencies require daily check-ins at which applicants may choose to sign in and leave immediately or stay and utilize agency computing and faxing resources. The next section of the report includes a recommendation on this point.

1st Meetings with an Eligibility FEP

The primary difference among agencies in this meeting relates to agency policies on assessing compliance. MAXIMUS is the only agency we found to explicitly utilize a hard-and-fast 80 percent compliance rule. Eligibility FEPs at that agency understand that applicants who do not comply at all during the first week have no chance to be deemed eligible for a tier placement no matter what they do in
the second week of the Rapid Attachment process. Workers at other agencies can be, and often are, more encouraging of applicants who have failed to comply so far.

2nd Meeting with an Eligibility FEP

All agencies use this meeting to assess and evaluate the applicant in the hopes of making an eligibility determination. As stated above, MAXIMUS is the only agency in which workers consistently report using an 80 percent compliance rule in determining eligibility for tier placement. Other agency staff report having more latitude in determining compliance and an ability to consider an applicant’s extenuating circumstances, although staff in these agencies say that applicants assigned to a W-2 tier must have been compliant in more than half of their assigned tasks. Another difference is that Dane County is the only agency that consistently reported utilizing the full 30-day period that may be allowed under W-2 policy to determine eligibility. In Dane County, applicants not assessed as compliant in the 2nd meeting with an Eligibility FEP can be assigned another week of Rapid Attachment requirements. In other agencies, applicants assessed as noncompliant must start the whole process over, beginning with making an appointment for an orientation session. The report suggests, below, a clarification of the time allowed for determination of tier placement.

SECTION 4: CONCLUSION AND TENTATIVE RECOMMENDATIONS

Our observations and interviews concerning the W-2 application process generated suggestions for potential policy and practice modifications that DWD may wish to consider. We expect to explore many of these issues further as we continue the analysis. The tentative recommendations cover 9 topics.

(1) Job Access Loan Guidelines. During orientation sessions we observed differences among agencies in their explanations of who could qualify for a Job Access Loan. For example, Dane County staff informed applicants that access to a bus line would lead to ineligibility for a Job Access Loan if the purpose of the loan was to assist in the purchase or repair of a vehicle. In contrast, MAXIMUS staff
informed an applicant who reported having been told about the bus-access rule at another W-2 agency that access to bus service was in no way a criterion for a Job Access Loan.

It is likely that staff were correct in both cases. The W-2 manual lists several prohibited uses of the Job Access Loan, none of which involve access to public transportation, but also states (Section 13.3.2) that “the W-2 agency has the authority to further define or expand upon this list of prohibited uses for Job Access Loans.” Flexible state policies that give choices to W-2 agencies may often be appropriate. However, access to a Job Access Loan seems to be of interest to many people attending W-2 orientation sessions, and those in attendance have often been to orientations offered by different W-2 agencies. In the case of the Job Access Loan, it may be that flexible guidelines lead some applicants to conclude that they are, or were, being treated unfairly by a particular W-2 agency.

(2) Child Support Pass-Through. There was substantial variation in the explanation of the treatment of child support. For example, we observed in one orientation session a staff member say that the termination of the full pass-through policy was the “state’s way of getting you used to living without child support when your children age out,” rather than explaining that a prior federal waiver that allowed the full pass-through had ended. It may be useful to offer staff concrete guidelines in explaining the recent shift in child support policy.

(3) Staff/Applicant Interactions. In general, we observed W-2 agency staff who were quite respectful of applicants. The only exceptions were in some orientations, when some facilitators made statements about the motivation of applicants, applicant family circumstances, and the likelihood of applicants’ compliance that seemed to question the desire of applicants to obtain and sustain employment. This type of interaction may not be helpful in encouraging applicants to move through the application process or become employed, and some state guidance or training may be appropriate.

(4) Review Current Arrangements with the Milwaukee County Human Services Department. The CARES system does not allow placement in a W-2 tier if inconsistencies between the W-2 application and existing CARES data arise or if county workers have entered an unresolved sanction. In these cases,
only county Human Service Department workers can make the needed adjustments. Yet, according to repeated statements from both W-2 agency customers and staff with whom we talked, gaining access to Milwaukee County Human Service Agency staff is quite difficult. For those without an appointment, county staff apparently see only the first 50 walk-ins each day, which, we were told repeatedly, means that lines start to form at 12th and Vliet as early as 3:00 a.m. For those who seek an appointment, it is usually necessary to stand in line at the county office for a long time, and the appointment will typically be for two weeks later. For participants in the Rapid Attachment process, devoting that much attention to county transactions when they are supposed to be searching for a job seems counterproductive.

Our observations and interviews occurred only at W-2 agencies, and Milwaukee County staff may have a different perspective. Still, it may be worthwhile for DWD, DHFS, Milwaukee County, and the Milwaukee W-2 agencies at least to explore limited placement of county Human Services Department staff in the W-2 agencies. County staff would not necessarily have to be placed in W-2 agencies to the extent they were in the first years of W-2 to be helpful. A possible model might be that of child support: one staff person from the Milwaukee County Child Support office is stationed in most W-2 agencies. That person helps initiate the child support enforcement process but does not eliminate all need for W-2 applicants to go to the central child support office in the Courthouse.

(5) Clarify the Availability of Child Care Services for Applicants Applying for Jobs. Section 5.1.2 of the W-2 manual says that “applicants required to do an up-front job search are not eligible for a W-2 cash benefit, but may be eligible for Medical Assistance, food stamps, child care, Emergency Assistance, and a Job Access Loan.” In addition, the eligibility guidelines for Wisconsin Shares say that “W-2 applicants participating in up-front job search, training, or orientation activities” are eligible for Wisconsin Shares assistance. In practice, however, applicants are not told that they are eligible for Wisconsin Shares child care during the 12-day application process, and some W-2 agency staff do not seem to know about that eligibility. In two separate interviews, staff said that child care subsidies were not available to applicants—only to those who are in a W-2 tier or hold a job. Applicants are thus able to
use child care provided in the W-2 agency when performing tasks on-site, but they receive no child care assistance when they are away from the W-2 agency and expected to submit in-person applications.

We are aware that child care funds are currently very tight and that future eligibility restrictions are more likely than eligibility expansions. We also understand that child care in Wisconsin Shares generally extends over a longer period than the Rapid Attachment process allows and that providers may not want to offer care for just a few days to families that do not obtain employment or a W-2 tier. Still, the lack of child care for applicants who are following the requirements of Rapid Attachment may prove a significant hardship for applicants who do not have social or family networks that can provide child care.

(6) Review Agency Check-In Requirements. Agencies that require check-ins on days in which workshop attendance is not required typically do not mandate that the applicant spend any time utilizing agency resources after they check in. However, they must typically sign in by 9 a.m. to avoid being judged noncompliant for that day. It may be that agencies with these policies are seeking to establish a routine that matches what applicants will experience in a real job, although it is not usual in a job to sign in at a particular time and then be allowed to leave. It may be appropriate for agencies with these policies to at least allow applicants a window of time to check in on days when no other use of agency resources is required. Observations at all levels indicate some applicants may find the daily check-in a hardship. Applicants with multiple children required at day care or school at different times may experience particular difficulty in arriving by 9:00.

(7) Consider Adjustments to Default Placements in Rapid Attachment. Section 5.1.2 of the W-2 manual includes the sentence, “While unsubsidized employment is the highest rung on the employment ladder, only applicants who are considered job-ready and who can benefit from job search may be assigned unpaid up-front job search as a condition of eligibility.” In practice, though, it seemed to us that the default decision of Resource Specialists is to assign applicants to Rapid Attachment, unless they have a child under 12 weeks old, are 18 and 19 years old and attending high school, or have clear verification
of a disability or medical condition. This includes applicants who say they have a medical condition and are in the process of obtaining verification and applicants who say they have no reliable child care.

We know that agencies often want to apply default standards that reduce the complexity of their daily decision-making. Still, especially if W-2 does not offer child care to W-2 applicants, it may be appropriate to give Resource Specialists explicit authority to defer Rapid Attachment in cases in which, in their judgment, a reasonable probability exists that the applicant is not job-ready or does not yet have access to suitable child care. If the applicant makes no further progress in supporting the case for medical or other conditions affecting job readiness by the first appointment with the Eligibility FEP, the Rapid Attachment process could begin at that point. Placements in a W-2 tier would then occur later, and more meetings with an Eligibility FEP would be necessary, but applicants would have a better chance to substantiate their job readiness status and arrange for child care before the obligations of Rapid Attachment begin.

(8) Clarify the Length of the Eligibility Determination Period. The W-2 manual states that the first meeting with an Eligibility FEP must occur within five working days after application and (in Section 5.1.1.1) that “the FEP has seven working days from the initial meeting with the applicant to determine nonfinancial and financial eligibility and, if eligible, which W-2 employment position is most appropriate.” This suggests that a total of 12 days is available for eligibility determination. Yet the manual also says, later in the same section, that “the application process can be extended up to 30 days only if the applicant needs extra time to meet verification requirements.” In practice, the Milwaukee W-2 agencies we observed rigidly limited themselves to 12 days of eligibility determination and required any applicant who had not achieved satisfactory compliance with Rapid Attachment requirements by that time to reapply and repeat the full process. In contrast, Dane County staff report that they often utilize a 30-day period to determine eligibility in cases in which applicants have not been compliant for a portion of their Rapid Attachment application period. Such applicants have another chance to comply in an extended
period of participation, without having to reapply and go through another round of the W-2 orientation, Resource Specialist meeting, and then a new period of Rapid Attachment.

(9) Reconsider W-2 Agency Staff Configurations. Dane County takes a different approach to the configuration of its staff than do the other three agencies, since all Dane County professional staff with W-2 responsibilities are involved in the full range of case management.\(^\text{12}\) They all rotate to deliver W-2 orientations; they all function as Resource Specialists immediately after the orientation for those who attended; on a “round robin” basis, they all are randomly assigned to meet with applicants as Eligibility FEPs; and they also all function as ongoing FEPs after eligibility determination has occurred.

Our impression was that this lack of specialization made a difference in the way applicants received treatment. Dane County staff seemed more willing to discuss issues, such as the ongoing reductions in the percentage of child support that W-2 participants are allowed to receive, that could produce tension. Two Resource Specialists at other agencies reported to us that they did not discuss this issue with applicants because it could be sensitive and because they assumed that the Eligibility or Ongoing FEP could handle it later. Dane County staff do not have quite the same set of incentives, since they know they could be the FEP who is left to discuss difficult issues at a later stage of the process.

Several of these tentative policy suggestions will benefit from further analysis. For example, we can explore whether Dane County’s use of a 30-day eligibility period for some applicants results in fewer applicant dropouts and reapplications. Interviews with applicant dropouts should also shed light on the significance of child-care related issues, staff/worker and client interactions, and agency scheduling of required tasks.

\(^{12}\) We understand that UMOS recently switched to a more integrated approach to case management services.