

WISCONSIN DEPARTMENT OF HEALTH SERVICES
Division of Medicaid Services
1 W. Wilson St.
Madison WI 53703

To: FSET Handbook Users

From: Jori Mundy, Bureau Director
Bureau of Eligibility and Enrollment Policy

Re: **FSET Handbook Release 22-02**

Release Date: 08/01/2022

Effective Date: 08/01/2022

EFFECTIVE DATE	The following policy additions or changes are effective 08/01/2022 unless otherwise noted. Underlined text denotes new text. Text with a strike through it denotes deleted text.
POLICY UPDATES	
1.1 FSET Program Description	Updated grammar and information for FoodShare basic work rules and work requirements.
1.3.2 Voluntary FSET Program	
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10.2 Appendix B: FSET vs IM Agency Responsibilities (Side-by-Side)	Updated grammar.

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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 FoodShare work requirements. ~~See the [FOODSHARE HANDBOOK 3.16.1 WORK REQUIREMENTS and 3.17.1 ABLE-BODIED ADULTS WITHOUT DEPENDENTS](#) (see [FoodShare Handbook Section 3.17.1 FoodShare Work Requirements for ABAWDs](#)).~~

1.3 FSET Program Delivery in Wisconsin

1.3.2 Voluntary FSET Program

~~Since 2008,~~ Wisconsin ~~has operated~~ operates a voluntary FSET program, which is 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~~ any FoodShare member aged 16 or older may choose to participate in the FSET program.

FoodShare members that are subject to the FoodShare work requirement can meet the ABAWD FoodShare work requirement through participation in FSET. ~~See the FOODSHARE HANDBOOK 3.17.1.7 ABAWD WORK REQUIREMENT (see the FoodShare Handbook Section 3.17.1.2 FoodShare Work Requirement for the complete list of ways that ABAWDs may meet the ABAWD work requirement.~~ ABAWD eligibility). Eligibility for FoodShare is limited to three months of TLB in a 36-month three-year period if an ABAWD is not meeting the ABAWD FoodShare work requirement and does not doesn't 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 members subject to the basic work registrants rules are not required to participate in FSET ~~in order~~ to meet the basic work registration requirements. See rules (see the FoodShare Handbook SECTION 3.16.1 FOODSHARE HANDBOOK 3.16.1 BASIC WORK REQUIREMENTS RULES for more information on the FoodShare basic work registration requirements. rules).

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~~ three-year time period for ABAWDs who do not meet the FoodShare 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~~ For more information about ABAWD TLBs and the three-year period, see the FoodShare Handbook FOODSHARE HANDBOOK 3.17.1 ABLE-BODIED ADULTS WITHOUT DEPENDENTS Section 3.17.1 FoodShare Work Requirements for ABAWDs.

During ~~a 36-month~~ the current three-year period, an ABAWD may continue receiving FoodShare benefits as long as the ABAWD is meeting the FoodShare work requirement or is later determined to be a non-ABAWD. Participating in the FSET program is one way for ABAWDs to meet the FoodShare 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~~ they have the opportunity to choose to participate, ~~as soon as possible,~~ and not exhaust ~~his or her~~ their time-limited benefit (TLB) months.

~~In order to~~ To meet the FoodShare work requirement through FSET participation, ABAWDs must participate in 'qualifying' activities. 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.

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~~ To meet the ~~ABAWD~~ FoodShare 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~~ can 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 (see FSET HANDBOOK 10.3 APPENDIX C: FSET FUNDABLE COMPONENT ACTIVITIES SECTION 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~~ Includes supervised employment search and workfare job search.
- ~~Supervised employment search is~~ is a non-qualifying activity.
- ~~Workfare job search is~~ 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 who are exempt should not be assigned to workfare job search.
 - See ~~FSET HANDBOOK 1.4.3 WORKFARE~~ SECTION 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 (see FSET HANDBOOK 6.4 CO-ENROLLMENT IN FSET AND ANOTHER ALLOWABLE WORK PROGRAM and SECTION 6.4 CO-ENROLLMENT IN FSET AND ANOTHER ALLOWABLE WORK PROGRAM and Section 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~~ SECTION 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 (ESL)
- General Educational Development (GED)
- 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 SECTION 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 [the FoodShare basic work rules and](#) FoodShare work requirements. While the student may volunteer to participate in another FSET activity, ~~his or her~~ [their](#) 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, ~~or~~ [both](#) 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 (see SECTION 6.3.2.4 DETERMINING REQUIRED HOURS OF WORKFARE 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

Work Experience, including training, is designed to improve the employability of household members through actual work experience, training, or both, and to enable individuals employed or trained under such programs to move promptly into regular public or private employment. Work Experience must be a planned, structured learning experience that occurs in the workplace for a limited time and may be arranged within the private for-profit sector, the non-profit sector, or the public sector. A Work Experience assignment is a qualifying activity and includes either Work Activity or Work-based Learning Activity.

- **Work Activity:** FSET workers may assign participants to Work Activity to provide them with an opportunity to acquire the general skills, knowledge, and work habits necessary to obtain employment. The purpose of Work Activity is to improve the employability of those who can't find unsubsidized full-time employment.
- **Work-based Learning Activity:** FSET workers may assign participants to Work-based Learning Activities for a sustained interaction with industry or community professionals in real world settings. This could also include simulated environments at educational institutions that foster in-depth, firsthand engagement aligned with the curriculum and instruction of the course.

Work-based Learning emphasizes employer engagement, includes specific training objectives, and leads to regular employment. Work-based Learning Activities include:

- On-the-job training
- Pre-apprenticeship
- Apprenticeship
- Short-term government-sponsored subsidized employment
- Internship

See ~~FSET HANDBOOK 6.3.3 REQUIRED COMPENSATION IN WORK-RELATED ACTIVITIES~~ [SECTION 6.3.3 REQUIRED COMPENSATION IN WORK-RELATED ACTIVITIES](#) for more information on assigning participants to [activities in the Work Experience activities component](#).

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 each job retention service assignment may be offered for no more than 90 days to participants who have secured employment while enrolled and participating in the FSET program.

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. When offering job retention, workers must document in PIN comments that the job retention activity was explained, offered, and whether job retention was accepted or declined.

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. Individuals may accept job retention services while they maintain employment at any time prior to disenrollment.

Example:	Sam participates in adult basic education and obtains their GED, gains full time employment, and declines job retention services. The following month, <u>while still enrolled in FSET</u> , Sam received feedback from their employer and needs to work on time management. Sam is again offered and accepts job retention services.
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Example:	Mark participates in career planning, gains full time employment, declines job retention services, and requests to end services. Mark is disenrolled from FSET. Later that year, Mark re-enrolls in FSET and asks for job retention for the employment gained prior to re-enrollment in FSET. The FSET case manager denies job retention services.
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An individual, who received job retention services for employment and then obtained new employment, may be eligible for additional job retention services, ~~if~~ if the individual participated in an FSET component in addition to job retention prior to gaining the new employment. If the individual is currently participating in an FSET component and obtains another job while receiving job retention services, the individual may be assigned a second period of job retention.

Example:	Sheena participates in supervised job search, gains employment, and receives 90 days of job retention services. Sheena <u>remains enrolled in FSET and</u> later participates in supervised job 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.
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Example:	Juan participates in job skills training, gains part-time employment, and begins job retention services. Juan continues to participate in supervised job search while in job retention services, and after 70 days, they obtain a second part-time job. The FSET case manager may provide case management services to help Juan maintain both part-time jobs. The FSET case manager may assign a second period of job retention services once the first 90-day period ends because Juan was participating in an FSET activity in addition to job retention services at the time that he obtained the second employment.
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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 sometimes will not continue to participate in other FSET components, but they have the option to 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 (IPV) 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~~ they are 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 CHAPTER 5 SUPPORTIVE SERVICES).

~~See FSET HANDBOOK SECTION 6.5.1~~ See SECTION 6.5.1 MONTHLY PARTICIPATION 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 Wisconsin Works (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
- Employment subsidized by Green Thumb, Senior Aides Older Worker Program, the Wisconsin Youth Conservation Corps (YCC), and Volunteers in Service to America (VISTA) workers.

1.4.9 Case Management

Case Management must be on every Employment Plan for all FSET participants. The Case Management activity is a qualifying activity that should be used for all initial and ongoing case management appointments. FSET workers must also assign at least one

activity in addition to case management for all FSET participants. For individuals who need to meet the able-bodied adults without dependents (ABAWD) work requirement, this additional activity must be a qualifying activity.

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 and Referral Type**
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 ABAWDFoodShare work requirement through participation in FSET. Non-ABAWDs may participate in FSET, but do not need to meet the ABAWDFoodShare work requirement. See the FSET HANDBOOK 6.3 FSET PARTICIPATION REQUIREMENTS SECTION 6.3 FSET PARTICIPATION REQUIREMENTS for more information on ABAWD status and FSET participation.
- **Determine Exemptions from the ABAWDFoodShare Work Requirement**
IM workers have primary responsibility for determining and verifying ABAWD exemptions from the FoodShare work requirement. However, FSET workers must understand ABAWD the criteria for exemptions from the FoodShare work requirement and be aware of changes in participants' ABAWD exemptions. participant's circumstances that may qualify the individual for an exemption. FSET workers may identify that an individual qualifies for an ABAWD exemption from the FoodShare work requirement 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 ABAWDFoodShare work requirement, see the FSET HANDBOOK 6.2.1 NON-ABAWD SECTION 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 ABAWDFoodShare 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.

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-, or an ABAWD who is living in an area or on tribal lands with a waiver of the time limit requests a referral to be sent. This is called a non-TLB referral. ABAWDs with a non-TLB referral due to meeting the FoodShare work requirement will exhaust a TLB if they stop meeting the ~~ABAWD~~FoodShare 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.

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~~FoodShare 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 (see FSET HANDBOOK 5.0 SUPPORTIVE SERVICES.SECTION 5 SUPPORTIVE SERVICES).~~

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~~FoodShare work requirement including the time-limited benefit policy, allowable ways to meet the ~~ABAWD~~FoodShare work requirement, and ~~ABAWD~~ exemptions from the FoodShare work requirement in accordance with FoodShare Handbook ~~FOODSHARE HANDBOOK 3.17.1 ABLE-BODIED ADULTS WITHOUT DEPENDENTS (ABAWDS)~~Section 3.17.1 FoodShare Work Requirements for 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~~FoodShare 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 questions regarding barriers ~~form is~~are 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~~they gain employment.

4.5 Initial Employment Plan

An Employment Plan (EP) is a written agreement developed jointly by a participant and ~~his or her~~their 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~~ (see [FSET HANDBOOK 8.1 EMPLOYMENT PLAN REVIEWS](#) SECTION 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~~

1. Goals and action steps ~~and 2) individualized~~
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 FoodShare** 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 SECTION 6.6 GOOD CAUSE](#).

When assigning activities, the FSET worker must ~~take into account~~ consider 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~~ To meet the [ABAWD FoodShare](#) 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 SECTION 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 FoodShare](#) work requirement (see ~~the~~ [FSET Handbook Section 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 [ABAWDFoodShare](#) work requirement by working. ~~See FSET HANDBOOK 6.3.2.1 ABAWD WORK REQUIREMENT for more information,~~ 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.~~ (see [SECTION 6.3.2.2 FOODSHARE WORK REQUIREMENT](#)). Some ABAWDs need to participate in FSET for 80 hours a month ~~in order~~ to meet the [ABAWDFoodShare](#) 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 [ABAWDFoodShare](#) 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.~~ (see [SECTION 6.3.2.3 DETERMINING REQUIRED HOURS OF PARTICIPATION](#)).
- 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~~ (see [SECTION 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 [ABAWDFoodShare](#) work requirement. ~~For~~ (see [SECTION 6.3.2.5 WORKFARE JOB SEARCH](#) 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~~ (see [SECTION 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 FoodShare** work requirement and maintain FoodShare eligibility, as long as completing those activities is realistic and directly related to an achievable goal.

5.1 FSET Participant Expense Reimbursement

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~~ FoodShare 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:~~

A cost is considered reasonable if it:

- Does not exceed that which someone who is careful with ~~his or her~~ their finances would pay.
- Provides a program benefit generally in line with its cost.
- Is comparable to other similar types of program costs, ~~an~~.
- 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, ~~;~~
- Is clear 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
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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.
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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.

5.1.1 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;~~ (see SECTION 10.4 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 participating in FSET if both statements are true:
 - Current employment is included as an assigned activity on the Employment Plan, ~~and~~
 - Other activities are assigned in ~~additional~~ 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.~~

Note: 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 SECTION 10.3 APPENDIX C: FSET FUNDABLE COMPONENT ACTIVITIES 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~~they 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.

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 Non-ABAWD, ~~Non-ABAWD~~, and FoodShare Ineligible.

6.2.1 Non-ABAWD

A FoodShare member is a non-ABAWD if ~~he or she meets~~ they meet 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 Medical Exemption from Work Requirement for ABAWDs (~~Form-01598 Medical Exemption from Work Requirement for ABAWDs~~) to verify)
 - Experiencing chronic homelessness
 - An individual is chronically homeless if ~~he or she~~they currently ~~lacks~~ lack 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.

Exempt from the FoodShare basic work rules, which includes someone who is:

- 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 ~~FoodShare Handbook~~ Section 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~~ six 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~~ they reside 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 FoodShare 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 (see Section 10.7 Appendix G—; FSET ABAWD Statuses (and FSET Referral Types) for more information.)

Although IM workers have primary responsibility for determining ~~ABAWD~~ exemptions from the FoodShare work requirement, 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 from the FoodShare work requirement 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. The FSET worker may also serve as a collateral contact or provide an acceptable written statement to assist the IM agency in the determination of ABAWD exemptions.

~~For more information about ABAWD status and exemptions, see FOODSHARE HANDBOOK 3.17.1 ABLE-BODIED ADULTS WITHOUT DEPENDENTS (ABAWDS):~~

For more information about exemptions from the FoodShare work requirement, see the FoodShare Handbook SECTION 3.17.1.4 VERIFICATION OF WORK HOURS AND EXEMPTIONS FROM FOODSHARE WORK REQUIREMENT.

6.2.2 Reserved

6.2.3 ABAWD

A FoodShare member is an ABAWD if ~~he or she does~~ they do not meet any of the criteria that make an individual exempt or a non-ABAWD as determined by the IM agency. ABAWDs are subject to TLBs and need to meet the ABAWD FoodShare work requirement to remain eligible for FoodShare. for more than three months in the current

three-year period. One of the ways these individuals can meet the FoodShare work requirement is through FSET participation.

All ABAWDs with a TLB referral type receive a referral to FSET. ABAWDs with a TLB referral type due to meeting the FoodShare work requirement 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~~FoodShare work requirement after exhausting three months of TLBs in ~~a 36-month~~the current three-year 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.~~

The current three-year period establishes the same start-and-end date for all applicants and members who may be subject to the FoodShare work requirement, regardless of the date they first accrued a TLB or were determined eligible for FoodShare benefits. When the new or subsequent three-year period starts, individuals or members who have accrued TLBs will have their count reset to zero. A new three-year period will start after the current three-year period expires:

<u>Three-Year Clock Start</u>	<u>Three-Year Clock End</u>
<u>January 1, 2022</u>	<u>December 31, 2024</u>
<u>January 1, 2025</u>	<u>December 31, 2027</u>
<u>January 1, 2028</u>	<u>December 31, 2030</u>
<u>January 1, 2031</u>	<u>December 31, 2033</u>
<u>January 1, 2034</u>	<u>December 31, 2036</u>
<u>January 1, 2037</u>	<u>December 31, 2039</u>
<u>January 1, 2040</u>	<u>December 31, 2042</u>

Once three TLBS are received, FoodShare eligibility is lost for the remainder of the current three-year period unless an ABAWD becomes a non-ABAWD by meeting an exemption or begins meeting the work requirement.

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

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

6.3 FSET Participation Requirements

6.3.1 Non-ABAWD Participation

Non-ABAWDs may participate in FSET, but are considered exempt and do not need to meet the ~~ABAWD~~ FoodShare work requirement. Non-ABAWD- or exempt 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~~ FoodShare work requirement will only be allowed to receive up to three full months of time-limited FoodShare benefits in ~~a 36-month~~ the current three-year time period. After exhausting three months of time-limited benefits (TLBs), ABAWDs may regain eligibility by either meeting the work requirement or an exemption. ABAWDs subject to time-limited benefits (TLBs) may choose to meet the FoodShare work requirement by participating in FSET.

6.3.2.1 Definition of Working for ABAWDs

For ABAWDs, working is defined as one or any combination 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~~ FoodShare Work Requirement

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

- Working a minimum of 80 hours per month. ~~Use~~ (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 Section 10.5 Appendix E: Qualifying Work Program for ABAWDs 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~~ FoodShare 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 FoodShare 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 FoodShare 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 do one of the following:

- Use half and quarter hours for weekly workfare assignment; ~~or~~
- Assign varying weekly hours in workfare on the EP. ~~For~~ (for example, the case manager can assign a certain number of hours for the first ~~3~~ three 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 \(see SECTION 1.4.3 WORKFARE for more information on assigning participants to workfare-\).](#)

Example 1:	<p>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).</p> <p>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.</p>
Example 2:	<p>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.</p>

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 \(see SECTION 1.4.3 WORKFARE for more information on assigning participants to workfare-\).](#)

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.
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6.3.3 Required Compensation in Work-Related Activities

FSET workers must assign only the number of hours calculated by household allotment divided by minimum wage in all work-related activities including Workfare, Work Activity, and Work-based Learning Activities. However, because Wisconsin operates a voluntary employment and training program, FSET participants can volunteer additional hours in a work-related activity beyond the hours equal to the household allotment divided by the minimum wage. In this scenario, the FSET participant must receive compensation earned by non-FSET participants while performing comparable work for comparable hours and be in compliance with minimum wage laws. FSET participants don't need to be paid for those additional hours if others participating in the work-related activity are also not paid while performing comparable work for comparable hours and the work does not fall under state or federal minimum wage requirements.

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**FoodShare 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**FoodShare work requirement. If an ABAWD is meeting the FoodShare work requirement through participation in another allowable work program, ~~he or she~~they 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~~ SECTION 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**FoodShare 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**FoodShare 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
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	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.
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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~~ Indicating if ABAWDs are anticipated to meet the current month's work requirement by the second Saturday of the month, for ABAWDs in the third time-limited benefit (TLB) 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~~ their TLBs and no longer be eligible for FoodShare for the remainder of ~~36~~ months. ~~See the current three-year time period (see FSET HANDBOOK 10.6 APPENDIX F: FSET WORKER TIME FRAMES)~~ SECTION 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 a minimum of one hour per month of job retention. However, tracking hours of participation in job retention depends on the actual number of hours the person receives job retention services. Track the actual number of hours of job retention that is completed by the participant as you would track any other assigned activity.

Example 1:	Veng participates in post-secondary education, and gains employment, and agrees to participate in job retention. Veng's FSET case manager updates his EP and assigns 4 <u>one</u> hour of job retention for the current month. Veng participates in 3 <u>three</u> hours of job retention services in March, so the FSET case manager tracks 3 <u>three</u> hours of job retention.
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See ~~FSET HANDBOOK 1.4.6 JOB RETENTION~~SECTION 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~~SECTION 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~~they are meeting the work requirement or ~~has~~have 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~~ (see the [SECTION 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 [FoodShare](#) 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 [FoodShare](#) 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 in 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
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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.
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6.5.4 Time Frames

FSET agencies are responsible for tracking the following within the specified time frames (see [FSET HANDBOOK SECTION 10.6 APPENDIX F: FSET WORKER TIME FRAMES](#) for details on FSET worker time frames):

- [Monthly Participation](#)
- [Met Work Requirement](#)
- [Anticipated to Meet Work Requirement](#)

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~~ consider FSET participation hours and any good cause granted.

This action should be taken only for ABAWD participants who must meet the [FoodShare](#) 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~~ [FoodShare](#) 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~~ [FoodShare](#) work requirement through FSET participation by the end of the current month, and are either in their:

1. ~~Are in their third~~ Third TLB month, ~~or~~
2. ~~Are in their second~~ 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 FoodShare** 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 FoodShare** 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 FoodShare work requirement. The FSET worker determines that Susie is anticipated to meet the March ABAWD FoodShare 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.
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If the FSET worker enters 'No' to the "Anticipated to Meet Work Requirement?" question and then the FSET participant completes the **ABAWD FoodShare** 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 <u>31</u> . 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 FoodShare work requirement by the end
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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 ABAWDFoodShare 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 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 ABAWDFoodShare work requirement in that month.

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.

Good cause should only be applied to participants that are subject to meeting the ~~ABAWD~~ FoodShare work requirement. 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 meets an exemption or 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~~ their control;
- The participant is unable to meet participation requirements because they were disenrolled and re-enrolled in FSET in the same month. ~~This~~ (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.

6.7 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 the FoodShare work requirements requirement. 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 FoodShare 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.

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~~.' 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 basic work ~~registration requirements~~rules should accept an offer of suitable employment if the position is within the scope of their employment goal as defined by ~~his or her~~their 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~~ work average hourly output) is at least minimum wage.
- The daily round-trip commuting time is less than ~~2~~ two hours, excluding time transporting a child to or from child care.
- 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~~ doesn't interfere with the person's religious observations, convictions, or beliefs.
- Within the first 30 days of ~~work registration~~ the application filing date, 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 Section 10.1 Appendix A); FSET Definitions)
- 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 (see Section 10.1 Appendix A: FSET Definitions)

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 SECTION 10.3 APPENDIX C: FSET FUNDABLE COMPONENT ACTIVITIES))
From a job	To a subsidized job (update -- OJ or WX (APPENDIX C SECTION 10.3 APPENDIX C: FSET FUNDABLE COMPONENT))
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	To return to same employer regardless of change in job title (even if held another job in-between) if the employee/employer relationship

medical leave	had not been severed and the employee did not have to reapply to return to work.
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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.

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 ABAWDFoodShare 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, and ABAWDs living in an area or on tribal lands with a waiver of the time limit of the FoodShare work requirement, 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 FoodShare 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.

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	

10.3 Appendix C: FSET Fundable Component Activities

Code	Description	Details
AP	Pre-apprenticeship /Apprenticeship	<p>Assign this activity for individuals interested in career paths that require apprenticeship training. Pre-Apprenticeship is an opportunity to help FSET participants gain the necessary skills for an apprenticeship. These programs can play a valuable role in preparing FSET participants for a career while contributing to the development of a diverse and skilled workforce. After completing the program, participants can visit our Registered Apprenticeship page (https://dwd.wisconsin.gov/apprenticeship/ra-applicants.htm) and put their new skills to action.</p> <p>Apprenticeships offer numerous benefits to both employers and participants. Apprenticeship is post-secondary education like a college or university, but apprentices learn only a portion of their skills in a traditional classroom. They receive most of their training on-the-job while working for an employer who pays a good wage. The employment is the primary requirement for an apprenticeship – a job must exist for the apprentice to be trained.</p>
A1	Post-Secondary Ed. – Two Years or Less	<p>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.</p>
BE	Adult Basic Education	<p>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</p>

		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.
CM	Case Management	Case Management must be on every Employment Plan for all FSET participants. The Case Management activity is a qualifying activity and should be used for all initial and ongoing case management appointments. FSET workers must also assign at least one activity in addition to case management for all FSET participants. For individuals who need to meet the FoodShare work requirement for able-bodied adults without dependents (ABAWD) work requirement , ABAWDs , this additional activity must be a qualifying activity.
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	<p>Use this code for individuals who participate in a set of activities designed to orient and enroll the individual into the FSET program.</p> <p>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.</p>
ES	Supervised Employment Search	<p>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.</p> <p>This is a non-qualifying activity for ABAWDs, unless it makes up less than half of an ABAWD's total monthly FSET participation hours.</p>
HE	High School Equivalency Diploma or GED	<p>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.</p>
IN	Internship	<p>Assign this activity to participants seeking short-term work experience to get entry-level exposure to a particular industry or field. It is as much of a learning experience as it is work. Ideally, interns spend their time working on relevant projects, learning about the field, making industry connections, and developing both hard and soft skills. Internships sometimes lead to full-time job offers. The criteria for participation will vary depending on the internship industry or field. For example, if a marketing internship is offered, workers will research the skills, knowledge, and experience necessary to participate in the marketing internship. If a participant does not meet the standards for the program, the FSET worker will assign the participant to other activities to gain the required skills for the marketing internship program.</p>
JR	Job Retention	<p>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</p>

		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>
OJ	On-the-job Training	Assign this activity when an FSET participant is performing tasks or processes related to their occupation. The FSET participant typically performs tasks that are

		essential to their job function with the supervision of a manager, coach, or mentor. This type of training is generally used to broaden an employee's skill set and to increase productivity.
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).
TJ	Transitional Job	Assign this activity to participants interested and involved in government-sponsored employment programs where the state subsidizes short-term work opportunities. This includes placement and training as well as pay to previously unemployed individuals in either the public, private, or non-profit sectors. Criteria for participation depends on the employment sector.
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	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. –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.
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 ABAWDFoodShare 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.

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		<u>ONLY UNDER SPECIFIC CONDITIONS.*</u>
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			Includes reimbursement for gas when it is reasonable and necessary for the participant to rely on someone else to provide transport to and from assigned FSET activities.
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.
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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.
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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 <u>FoodShare</u> work requirement
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	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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10.6 Appendix F: FSET Worker Time Frames

Time Frames	Importance
1st of the month	<ul style="list-style-type: none"> • Pull FSET enrollees detail report for expiring employment plans and/or schedule employment plan review appointments.
5th of the month	<ul style="list-style-type: none"> • Update the “Work Requirement Met” field indicating the prior month’s participation.
6th of the month	<ul style="list-style-type: none"> • Begin disenrolling individuals who are no longer eligible for FoodShare as of the end of the prior month.
No later than the 2nd Saturday of the month	<ul style="list-style-type: none"> • Update the “Anticipated to Meet Work Requirement” field. • CARES Worker Web (CWW) pulls information from the “Work Requirement Met” field and uses it to update the FoodShare clock.
Adverse Action	<ul style="list-style-type: none"> • CWW pulls information from the “Anticipated to Meet Work Requirement” field and uses it to update the FoodShare clock.
5 Business Days	<ul style="list-style-type: none"> • An FSET participant should be contacted either by letter or telephone within five business days of the FSET agency receiving a referral.
10 Business Days	<ul style="list-style-type: none"> • 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). • Initial employment plan should be developed at initial appointments.
12 Calendar Days	<ul style="list-style-type: none"> • 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).
2 Months	<ul style="list-style-type: none"> • Non-ABAWDs and ABAWDs meeting the work requirement outside of FSET (with non-TLB referrals) may be disenrolled from FSET if they have not participated in FSET for two months without agency contact. • FSET workers have up to two calendar months from the FoodShare eligibility end date to override a disenrollment.

90 Calendar Days	<ul style="list-style-type: none"> FSET participants may receive up to 90 days of job retention services after securing employment through FSET.
90 days <u>3 Months</u>	<ul style="list-style-type: none"> The longest duration of an ABAWD's employment plan is (90 days). ABAWD employment plans must be reviewed every three months, at minimum. The number of time-limited benefits <u>benefit</u> (TLBs) <u>months</u> an ABAWD may receive without meeting the <u>FoodShare</u> work requirement. The number of additional months an ABAWD may earn after exhausting his or her <u>their</u> three TLBs.
180 days <u>Days</u>	<ul style="list-style-type: none"> 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.
36 months <u>3 Years</u>	<ul style="list-style-type: none"> The duration of an ABAWD's <u>the statewide, fixed three-year clock for ABAWDs subject to the time limit of the</u> <u>FoodShare</u> clock <u>work requirement</u>.