

**DCF Order #12 – issued 3/20/2020**  
**Division of Family and Economic Security**  
**Frequently Asked Questions:**  
(Regarding COVID-19 from Stakeholders)

DCF's most critical concern is the health and wellbeing of staff, partners, and program recipients. All partner agencies should follow public health guidance from the CDC and the Department of Health Services (DHS). Our goal is to support partner agencies in meeting the needs of program participants during this time, leveraging technology resources as well as flexibility in policy and procedures. Please contact your DCF point of contact or [DCFMBCOVID19@wisconsin.gov](mailto:DCFMBCOVID19@wisconsin.gov) with any questions. Thank you!

**Questions from Refugee Stakeholders**

- Q. How will reduced or delayed services impact us under the program requirements (e.g., closing ESL classes or cultural orientation, suspending employment workshops, completing refugee medical screening that needs to be done within first 30 days after arrival)?***
- A. While we have not yet received any guidance from the Federal Office of Refugee Resettlement (ORR) we expect we will receive guidance at some point in the near future. Contractors should do their best to meet program requirements. DCF does not plan to monitor program compliance during this time. Agencies should do what they feel is best for their staff and participants. Agencies should be flexible and alternative approaches to services should be explored, e.g., meetings over the phone, independent activities at home, remote work.
- Q. What guidance can DCF give us for continuing our operation under the DCF funded programs?***
- A. Agencies should continue their operations to the best of their ability keeping the safety of their staff and participants as the top priority. Agencies should be flexible and alternative approaches to services should be explored, e.g., meetings over the phone, independent activities at home, remote work.
- Q. If we do not spend the funding that we were awarded due to limited operations, can we carry over those funds in order to provide intensive services once the operation is back on?***
- A. We have some flexibility to carry over Office of Refugee Resettlement funding from one Federal Fiscal Year to the next. At this time, we believe this will be possible. ORR has indicated that they will be flexible financial, however we have not yet received any specific guidance or documentation; they indicated they would deal with this on case by case/state by state basis.
- Q. Can refugees be exempt from W-2 and RCA in person in take appointment, as well as participation requirements under either program as they in addition to their appearance require refugee resettlement staff's presence?***

- A. Yes, individuals may be given good cause for missing assigned activities due to the pandemic. Appointments may be done over the phone and electronically, including appointments that require a face to face meeting.

#### **Questions from W-2 Contractors**

***Q. Will DCF be suspending or amending the work requirements or lowering the Work Participation Rate requirement as a result of the virus?***

- A. Individuals may be given good cause for missing assigned activities due to the pandemic. Agencies should be flexible and alternative approaches to services should be explored, e.g., meetings over the phone, independent activities at home, remote work. Appointments may be done over the phone and electronically, including appointments that require a face to face meeting. The Bureau of Working Families will be discussing the impact of the pandemic on performance outcome and incentive payments in the upcoming weeks.

***Q. Is there any guidance from DCF to operating the W-2 program during this pandemic? This includes entering good cause and case comments later than the standard required timeframe due to potential shutdown or staff shortages?***

- A. Agencies should continue their operations to the best of their ability, keeping the safety of their staff and participants as the top priority. Agencies should be flexible and alternative approaches to services should be explored, e.g., meetings over the phone, independent activities at home, remote work. DCF understands that agencies may have difficulty meeting some required timeframes and will be flexible with program requirements and will allow a reasonable timeframe to recover and process needed programmatic work including printing and mailing EPs, entering case comments, updating time limit information, processing EP and eligibility reviews, etc. that is delayed due to the pandemic.

***Q. What is the guidance for work experience sites, training and education sites that contract with W-2 agencies?***

- A. Agencies should continue their operations to the best of their ability keeping the safety of their staff and participants as the top priority. Agencies should follow CDC guidance regarding safety and public health. Agencies should be flexible and alternative approaches to services should be explored, e.g., meetings over the phone, independent activities at home, remote work. We understand that Colleges and Community Organizations are closed for the near future. Agencies should accept whatever alternative approaches, if any, those organizations are taking to continue to provide services, e.g., work at home packets, on-line courses. Flexibility and understanding are guiding principles during this time.

***Q. Will DCF allow for phone contact to complete general monthly appointments, extension reviews, employability plan (EP) reviews, eligibility reviews, and other standard appointments?***

- A. Yes, appointments can occur via the phone and electronically and EPs and other information can be processed electronically or via standard mail.

***Q. If agencies close for any period of time, will agencies be allowed to wait until sites re-open to print and mail EPs and other correspondence?***

- A. In this age of technology, we don't expect that agencies will completely close, we would expect that agencies have Continuity of Operations Plans that will allow them to provide basic services to their participants while keeping the safety of their staff and participants the top priority, this includes remote work and the use of technology to carry out basic services. Agencies should do what they feel is best for their staff and participants. DCF will be flexible with program requirements. Agencies will be allowed a reasonable timeframe to recover and process needed programmatic work including printing mailing EPs, entering case comments, updating time limit information, processing EP and eligibility reviews, etc. once normal operations have resumed.

**Q. *What is the guidance for intakes, Emergency Assistance, and Job Access Loans, etc.?***

- A. DCF will permit applications for these programs to be taken over the phone. Documentation of eligibility criteria that is not questionable should not delay processing applications for these programs. Collateral contacts are acceptable if guidance required. A recommendation is for each agency to dedicate essential staff to be available to complete these functions or make sure individuals are familiar with and comfortable using ACCESS.

**Q. *What if the building owner decides to close the site where W-2 agencies are located?***

- A. If the building where W-2 services are provided is closed we expect the W-2 Agency to deploy their Continuity of Operations Plan to ensure basic services continue to be available and participants know how to access W-2 agency staff. The safety of program participants and program staff are the primary concern during this time and agencies should follow public health guidance from the CDC.

**Question from the Boys and Girls Club**

**Q. *Can we count on our DCF partner funders to ensure that both full-time and part-time scheduled hours that staff are unable to work due to closure are reimbursable grant-based expenses?***

- A. Properly allocated paid leave time is already eligible. if you are unsure about how to allocate leave costs for your grant, the Department of Children and Families' Bureau of Finance can provide some technical assistance. If the leave time is eligible and paid from other federal or state sources, then it would not be eligible (can't double dip)