Contents

Module 7 – WIPA Standards, Data Collection Requirements, and Quality Considerations for CWICs

Introduction

Social Security made quality assurance a cornerstone of the development of the WIPA program. Without an emphasis on quality, beneficiaries would be at risk of receiving inaccurate information and may not receive the exemplary services they deserve. Therefore, it‘s imperative that Community Work Incentives Coordinators (CWICs) have the resources necessary to provide high-caliber planning, counseling, and support services on sensitive topics related to finances and healthcare coverage to the beneficiaries they serve.

This module focuses on planning and implementing quality improvement activities that enable CWICs and WIPA projects to provide state-of-the-art services to beneficiaries. Unit 1 describes the first step in quality assurance - compliance with basic requirements established by Social Security for all WIPA projects. Unit 2 focuses on the WIPA data collection and performance benchmarks. Unit 3 describes strategies for providing WIPA services with a focus on quality. Unit 4 offers specific information about providing WIPA services that accommodate disabilities, and respect cultural differences. Unit 5 describes a set of ethical standards that CWICs must abide by in the performance of their duties.

CWIC Core Competencies

- Demonstrates an understanding of the minimum compliance requirements for WIPA projects as stated in the WIPA Cooperative Agreement.
- Performs data collection duties as required by Social Security using the WIPA National Data System.

- Provides WIPA services in a manner that strictly protects beneficiary personal information and adheres to Social Security’s data security requirements.
- Identifies and describes indicators of high-quality WIPA services and demonstrates an understanding of the CWIC’s role in achieving these indicators.
- Demonstrates the ability to provide culturally sensitive and competent work incentive counseling services that enable the beneficiary to access and benefit from the WIPA program, regardless of the need for communication or program accommodations for persons with disabilities, diverse cultural or linguistic backgrounds, or geographic location of residence.
- Consistently uses an array of available training and technical support resources (POMS and other online resources, WIPA project networking, assistance from Regional TA Liaisons, VCU NTDC supplemental trainings) in order to develop and enhance professional knowledge and skills in order to improve the quality of WIPA services.

Competency Unit 1 – WIPA Quality Assurance Baseline: Compliance with Minimum Requirements

Introduction

To begin a discussion about quality as it relates to WIPA services, we must first determine Social Security's expectations for WIPA projects. As the primary funder of WIPA services, Social Security seeks certain features, characteristics, results, or outcomes from its vendors (WIPA projects) and uses these specifications to assess quality and overall satisfaction.

Social Security first described the minimum WIPA standards of performance in the Request for Proposals released in May 2006. These requirements have evolved over the years, with the latest iteration detailed in the Request for Applications released in January 2015 (WIPA-WIP-15-001, CFDA 96.008). WIPA projects operate under a written cooperative agreement with Social Security that articulates the expectations of the agency in the Terms and Conditions of the award. These requirements are the starting point for our discussion of quality assurance and represent the minimum standards for WIPA services. Compliance standards in the cooperative agreement documents include:

- Staff training and credentialing requirements;
- WIPA service delivery requirements;
- Maintaining beneficiary confidentiality and privacy; and
- Program administration requirements.

This unit will focus on the first three areas identified above, because these requirements relate specifically to CWICs and the daily work they perform in providing WIPA services.

Staff Training and Credentialing Requirements

CWICs deal with critical issues relating to personal finances and health coverage that can have a profound impact on a beneficiary's economic and physical well-being. In order to provide sound advice and avoid harming a beneficiary, CWICs must attain and maintain a high level of knowledge and skill and apply this knowledge and skill effectively. The 2017 WIPA Terms and Conditions document contains very specific requirements that CWICs must meet related to professional development and credentialing. First, the document states:

> *"WIPA grantees must send staff designated to be CWICs to the official Social Security-approved initial CWIC training. Staff must attend initial training and successfully complete certification unless they meet exceptions defined by Social Security. An example of an exception may be recent prior certification under another WIPA cooperative agreement."*

Social Security requires all CWICs to complete the WIPA initial training program and successfully complete a series of competency-based assessments to be certified to provide Work Incentives Planning and Assistance services to beneficiaries. The competency assessment and certification processes are directly linked to the WIPA initial training program. CWICs receive training on each of the core competencies addressed in this manual during the 5-day initial training program. CWICs participate in the assessment activities to certify their competency in each of these main competency areas immediately following the training.

Beginning with initial training classes held after July 1, 2016, WIPA trainees must also successfully complete a web course that covers the other federal benefits and training on the WIPA National Data Management System (also known as Efforts to Outcomes or ETO) prior to achieving full certification. These training events are provided by the WIPA National Training and Data Center (NTDC) at Virginia Commonwealth University (VCU).

Completing CWIC initial training and certification process ensures that all WIPA personnel providing direct services to beneficiaries attain a baseline of knowledge and a starting point upon which to build competency. This initial training provides CWICs with the minimum competency level necessary to ensure that beneficiaries receive accurate and timely information. Next, the Terms and Conditions document requires that CWICs build competency in several key areas beyond those covered during initial training. It states that:

> *"WIPA Directors must provide training opportunities and technical assistance for all CWICs on applicable State and local programs and the effect that beneficiary employment has on these programs. Directors shall encourage WIPA staff to attend State and local training opportunities as part of their duties and shall provide resource materials for CWICs to investigate State and local benefit situations. It is the WIPA Director and CWIC's responsibilities to obtain, learn and maintain expertise on the specifics of the State and local benefits programs and employment supports in the service area."*

In addition to the initial training and Other Federal Benefits web course, Social Security expects CWICs to access state-specific information about other federal or state specific programs such as Medicaid, Worker's Compensation, Unemployment Insurance, Temporary Assistance for Needy Families (TANF), Supplemental Nutrition Assistance Programs (SNAP), federal and state housing assistance programs, federal and state veterans' programs, federal, state or local Individual Development Account (IDA) programs, and other federal and state benefit programs. While the federal parameters for these programs are described in Module 5 and covered in detail in the required Other Federal Benefits web course, there are many additional state and local rules that will vary based on beneficiary location. CWICs must take the initiative to build competency in all of the state-specific benefits that a beneficiary's employment could potentially affect. Social Security requires all WIPA projects to ensure that staff members are fully trained on the state specific benefits and the effect of paid employment on these benefits.

Finally, Social Security expects CWICs to build professional competency over time by participating in supplemental training and technical assistance opportunities offered by VCU's NTDC. Social Security requires CWICs to complete a specified number of continuing certification credits (CCCs) each year to maintain the CWIC certification credential. The Terms and Conditions document states that:

Fully certified CWICs must accrue a minimum of eighteen (18) Continuing Certification Credits (CCC), as defined by Social Security, to enhance their skills and retain certification. Certified staff must meet this requirement annually during each grant year.

This requirement applies to all fully certified WIPA CWICs and Project Managers providing WIPA benefits counseling services, regardless of their date of initial certification. Fully certified WIPA personnel must complete the continuing certification requirements within each performance period (award or grant year). Social Security requires certified WIPA staff to earn credits in three areas:

1. Twelve credits of training provided by VCU's NTDC. Social Security may provide three CCCs in lieu of three VCU NTDC training credits for conference attendance under certain prescribed circumstances. The WIPA staff member attending the conference must submit a request for approval to his or her Project Officer prior to conference attendance.

2. Three credits for state and local training events approved by the Social Security Project Officer; and

3. Three credits for the submission and approval of a Benefits Summary and Analysis (BS&A) report. All fully certified WIPA staff working as CWICs must submit one BS&A report at least once every three years as part of the continuing certification requirement. Three additional supplemental training credits may be earned for years in which CWICs are not required to submit a BS&A.

WIPA Project Managers who serve as CWICs must meet the CWIC certification requirements described above. Project Managers who don't have a caseload are not required to meet the three (3) credit BS&A requirement, but must submit written document describing efforts to retain benefits planning knowledge and skill in lieu of a BS&A.

Community Partner Work Incentives Counselors (Community Partners) who participated in the initial training and successfully completed all requirements for full certification must also complete specified training to retain certification, and to retain access to technical assistance provided by VCU's NTDC. To retain Community Partner certification, and to continue to access technical assistance and training from VCU, fully certified Community Partners must successfully complete eighteen (18) credits annually. The annual certification period is from July 1 through June 30, and participants must earn all 18 credits during this period each year. Community Partners may not use any training other than the training offered by VCU NTDC to meet the requirements.

VCU's NTDC has developed an online tracking system for Continuing Certification Credits for certified WIPA staff and Community Partners. Fully certified WIPA personnel and Community Partners are able to log into their myNTC account on the VCU NTDC website to view and manage progress towards meeting continuing certification requirements.

WIPA Service Delivery Requirements

A number of requirements in the 2017 Terms and Conditions document describe how Social Security expects CWICs to deliver WIPA services to beneficiaries. First, Social Security requires WIPA Projects to to:

> *"Provide SSDI and SSI beneficiaries with disabilities work incentives planning and assistance services to support their efforts to acquire, retain, and increase meaningful employment and improve financial independence. Such services include timely, accurate, and comprehensive WIPA services. (Note: WIPA staff may not represent beneficiaries in appeals. Instead, WIPA staff may inform beneficiaries of their right to appeal and help them understand options to mitigate or respond to overpayments (i.e. requesting appeals, waivers, or payment plans)."*

Social Security goes on to state that WIPA projects must:

> Provide comprehensive, proactive guidance to beneficiaries to:
>
> - Help them anticipate and plan for changes in their benefits;
> - Facilitate use of and access to available Federal, State, and local work incentives including, but not limited to, Plans to

Achieve Self-Support (PASS), the Ticket to Work (TTW), and Impairment Related Work Expenses (IRWE);
- Encourage retention of appropriate documentation in order to report wages and ensure access to work incentives;
- Encourage and support accurate and timely reporting to reduce the size or likelihood of overpayments; and
- Offer information and connect beneficiaries to supports they need to access services to make a successful transition to employment.

These instructions clearly define the role of CWICs as promoting employment and improving financial independence. This role is discussed at length in Unit 1 of Module 1. The requirements also specify services that Social Security prohibits — namely, representing beneficiaries in overpayment and appeals. CWICs have an obligation to focus their efforts on activities that Social Security authorizes and prioritizes.

Outreach Requirements

There are several important requirements related to CWICs conducting outreach activity that are covered in detail in Module 2. In summary, these include:

- Limiting outreach activity to 10 percent of work effort and expenditures ;
- Including the Ticket to Work Help Line (TtW Help Line) contact information as the primary contact for beneficiaries on websites, in brochures, and within presentations to the greatest extent possible consistent with the WIPA business model; and
- Submitting all marketing or public information materials used in outreach activity to Social Security for review and approval.

Service Priorities

Social Security also provides direction on which beneficiaries they view as the highest priority for WIPA services. CWICs are required to prioritize WIPA services to beneficiaries who are employed or actively pursuing employment as described in Unit 1 of Module 6. In addition, Social Security has instructed CWICs to spend the bulk of their time in delivering individualized, intensive work incentives counseling to high-priority beneficiaries as opposed to providing generic, short-term information and referral services to beneficiaries who are a lower priority. Starting with contract year 2016 and subsequent years, projects should limit I&R services to 10 percent of their total effort. For an in-depth discussion of these requirements, refer to Unit 2 of Module 6.

Collaborative Relationships

As described in Module 1, Social Security views WIPA services as an essential component within a larger collaborative effort to promote employment among disability beneficiaries. As part of the collaboration and coordination requirements for the WIPA program, Social Security expects CWICs to develop functional working relationships with the local Social Security offices, AWICs, and PASS cadre staff. Social Security also requires CWICs to become familiar with the Employment Networks (ENs) and refer beneficiaries as appropriate to the Protection & Advocacy agency within their service area. Social Security expects CWICs to work cooperatively with federal, state, local, and private agencies, and other organizations that serve beneficiaries with disabilities seeking employment.

Performance Benchmarks

An important requirement contained in the Terms and Conditions is that WIPA grantees must meet or exceed the National WIPA Performance Benchmarks. These benchmarks are included as an attachment to the Terms and Conditions document. CWICs are strongly encouraged to review the current performance benchmarks, in order to understand the expectations for services. You should direct any questions regarding the benchmarks and strategies for achieving them to the designated VCU Technical Assistance Liaison or to your Social Security Project Officer.

Other WIPA Service Requirements

Finally, Social Security has specific expectations in several additional areas:

- WIPA project staff shall maintain the highest ethical standards in their dealings with Social Security's beneficiaries. This includes avoiding all potential conflict of interest. Ethical standards for CWICs are discussed at length in Unit 5 of this module.

- WIPA projects are required to provide WIPA services that accommodate disability and respect cultural differences. This topic is covered fully in Unit 4 of this module.

Compliance with Social Security's Policy on Confidentiality and Privacy

WIPA projects must collect and report beneficiary data as required by Social Security. This data is for evaluation, program performance, and statistical purposes only. This includes, but isn't limited to, Social Security Number (SSN), the name, address, and work activity for the beneficiary, as well as other highly sensitive information.

All beneficiary information provided to a CWIC must be kept strictly confidential at all times. Maintaining the confidentiality and privacy of the beneficiary is of utmost importance. CWICs are required to follow Social Security's Privacy and Confidentiality policies for maintaining records of individuals, as well as provide specific safeguards surrounding beneficiary information sharing, paper, computer records, data, and other issues potentially arising from providing work incentives planning and assistance services to Social Security disability beneficiaries. Social Security requires CWICs to abide by the following policies:

- WIPA staff may only enter beneficiary data into the Social Security-approved National WIPA Data Collection System, and only via the Social Security-furnished laptops. The agency doesn't permit WIPA projects to maintain beneficiary Personally Identifiable Information (PII) in any other data collection system.
- WIPA project personnel may only transmit PII as encrypted attachments to email messages. CWICs are required to provide the password for the encryption to the beneficiary by phone call or in a separate email message. CWICs are prohibited from sending PII in the body of email messages.
- Beneficiary data contained in paper files must be accessible only to project personnel via locked file cabinets.
- WIPA projects may only release personal information when a beneficiary signs a release of information form that identifies an individual or an organization with whom to share it and the

personal data to be shared. WIPA projects must carefully consider the extent of information they release and should limit the release to only what is necessary to provide knowledge about work incentive options available to the beneficiary.

- WIPA projects may only release information that they generate such as BS&A reports, WIPs, intake interviews, or case notes. The exception is when a release specifies the entity responsible for the data. WIPA projects may only share information with entities that the beneficiary has given specific, written authorization for release of information. They must remove all PII, such as the beneficiary's full name or SSN, before sending.
- Reports should include only identifying information that is absolutely necessary to provide quality services. Beneficiaries or their legal guardians can view the WIPA file at any time. In addition, they have the right to make copies of all documents in the file and release that information to another agency at their own discretion.
- Social Security requires all WIPA personnel providing services, and anyone within the organization listed on the WIPA cooperative agreement with access to beneficiary data to successfully complete a Social Security suitability clearance. New staff, without exception, may not access information through the WIPA data system until they successfully complete the suitability clearance process. WIPA personnel should direct questions about specific strategies to protect information to the Social Security Office of Research, Demonstration and Employment Support (ORDES) Project Officer.
- Social Security must approve any hardware, peripherals, software, and assistive technology WIPA projects use in conjunction with the government-furnished laptop. Social Security doesn't permit projects to load software that might interfere with the security of the laptops.
- WIPA projects must safeguard computer access by password protection.

An attachment to the WIPA Terms and Conditions detailing all responsibilities regarding PII is provided at the end of this unit.

Conclusion

WIPA projects operate under a cooperative agreement with Social Security. As the primary funding and administering agency, Social Security is responsible for delineating the quality assurance requirements. Compliance with minimum requirements is only the first step in the quality assurance process. High-quality WIPA services require much more effort than just meeting these basic standards.

Conducting Independent Research

Consent for Release of Information - Form SSA-3288 (7-2013) Effective (7-2013): https://www.socialsecurity.gov/forms/ssa-3288.pdf

Additional Resources

On the following page, you will find a reprint of Attachment B to the 2015 WIPA Terms and Conditions document entitled, *"Grantee Responsibilities Regarding Personally Identifiable Information (Pii)."*

WIPA 2017 Terms and Conditions - Attachment B

Grantee Responsibilities Regarding Personally Identifiable Information (Pii)

The following award condition shall be followed for the Work Incentives Planning and Assistance (WIPA) program.

1. **Definition of Personally Identifiable Information (PII).** SSA follows the definition of PII provided by the Office of Management and Budget in OMB Memorandum M-06-19: "Personally Identifiable Information means any information about an individual maintained by an agency, including, but not limited to, education, financial transactions, medical history, and criminal or employment history and information which can be used to distinguish or trace an individual's identity, such as their name, social security number, date and place of birth, mother's maiden name, biometric records, etc., including any other personal information which is linked or linkable to an individual."

   Other examples of PII may include: Social Security benefit data, date of birth, official State or government issued driver's license or identification number, alien registration number, government passport number, employer or taxpayer identification number, home address, and medical information.

   Within this clause, "PII" shall specifically mean P11 as defined above that: (1) the Government has a primary responsibility for protecting under this grant/cooperative agreement and **(2)** is made available to the grantee and/or any grantee subcontractor, including their respective employees, in order to perform under this grant/cooperative agreement (e.g., under the grant/cooperative agreement, the Government directly furnishes PII to the grantee/grantee subcontractor, or the grantee/ grantee subcontractor, on behalf of SSA, collects PII from outside sources, such as in a public survey).

2. **Applicability.** This award condition applies to all grantee employees and grantee subcontractors in either of the following two situations:

a. The grantee/grantee subcontractor is furnished PII by the Government under this Grant/Cooperative Agreement, or

b. The grantee/grantee subcontractor collects PII while carrying out project responsibilities under this Grant/Cooperative Agreement.

Wherever grantee employees are referenced in this award condition it also applies to grantee subcontractors at any tier.

3. Grantee Employee Responsibility in Safeguarding PH.

a. General. The grantee shall take reasonable measures to ensure that its employees properly safeguard PII from loss, theft or inadvertent disclosure for PII either: 1. furnished by the Government under this Grant/Cooperative Agreement, or 2. collected while carrying out project responsibilities under this Grant/Cooperative Agreement.

The grantee shall make every reasonable effort to ensure that its employees understand that they are responsible for safeguarding this information at all times, regardless of whether or not the grantee employee is at his or her regular duty station. Examples of proper actions include, but are not limited to: not sharing one's password with others or writing it down, verifying the identity of individuals before disclosing information to them, preventing others in the area from viewing PII on one's computer screen, consistently locking or logging off one's workstation when one is away, and ensuring that PII is appropriately returned or upon Government permission, destroyed when no longer needed. The applicable Federal records retention regulations provide guidance concerning this topic.

b. Transporting Information Outside a Secure Area. The grantee shall take reasonable measures to ensure that its employees make every reasonable effort to safeguard equipment, files or documents containing PII when transporting information from a secure area. The grantee employee should ensure that laptops and other electronic devices/media are encrypted and/or password protected. The grantee employee must use common sense when transporting

PII, e.g., storing files in a locked briefcase, not leaving files and/or equipment in plain view.

c. **Emailing PII.** PII about an individual in electronic form must be protected to the extent that a paper record is protected under the Privacy Act of 1974. Protected citizen and programmatic information may be transmitted via email for official business purposes only. The grantee shall make every reasonable effort to ensure that, when sending email containing **PH** (either in the body or in an attachment), its employees do so only by secure methods, which encrypt the message and comply with SSA policy and procedure.

In order to ensure security of the Agency's information, the Agency requires all employees to adhere to the following requirements:

- Sensitive data that is to be transmitted in either direction beyond the SSA Network, (i.e., external to the firewall) must be encrypted or otherwise protected as approved by SSA's Chief Information Security Officer (CISO).
- Media that contains sensitive data that is transported or stored off site must be encrypted or otherwise protected as approved by CISO. This includes but is not limited to PCs, PDAs, USE flash drives, CDs, DVDs, floppies or tapes containing sensitive information.
- Encryption-related information (such as keys) must be secured when unattended or not in use.
- Unauthorized decryption of encrypted information is strictly prohibited.

The encryption method employed must meet acceptable standards designated by the National Institute of Standards and Technology (NIST). The recommended encryption method to secure data in transport for use by SSA is the Advanced Encryption Standard (AES) or triple DES (DES3) if AES is unavailable. Those considering the use of other algorithms must submit them with a request for exception to the SSA Office of Systems Security Operations Management (OSSOM).

Email addresses not considered acceptably secure by SSA shall not contain PII in the body of the message or in an unencrypted attachment.

4. Procedures for all grantee employees for reporting the loss or suspected loss of PH.

The grantee shall make every reasonable effort to ensure that its employees working under this Grant/Cooperative Agreement follow the following procedures for reporting lost or possibly lost PII that was in their possession at the time:

a. When a grantee employee becomes aware of the possible or suspected loss of PII, he/she shall have an employee of the awarded grantee organization provide immediate notification of the incident to the primary Government manager contact person specified by the SSA Grants Management Office. Examples of incidences indicating possible or suspected loss of PII include missing equipment (including laptops, and removable storage devices such as USB flash or “thumb” drives, CDs, DVDs, etc.) and/ or paper documents potentially containing PII.

b. If the primary Government manager is not readily available, the grantee employee shall immediately notify, depending upon availability, one of two Government alternates designated by the primary Government manager for reporting such incidents. Prior to commencing work on the Grant/Cooperative Agreement, each grantee employee shall know who the primary and alternate Government contacts are and how to contact them. Whenever the grantee employee removes PII from the Government facility or is collecting PII under this Grant/Cooperative Agreement away from the Government facility, he/she must have current contact information for the primary Government manager and the two alternates.

Title	Name	Email	Phone
Primary Government Manager	Christopher Brennan	Christopher.Brennan@ssa.gov	410-966-0392
Alternate 1	Audrey Adams	Audrey.Adams@ssa.gov	410-965-9469
Alternate 2	Dionne Mitchell	Dionne.Mitchell@ssa.gov	410-965-9534

c. The grantee employee shall provide updates as they become available to the primary Government manager or the alternate, as applicable, but shall not delay the initial report.

d. The grantee employee shall provide complete and accurate information about the details of the possible PH loss to assist the Government manager/alternate. The grantee employee shall include the following information:

1. Contact information.
2. A description of the loss or suspected loss (i.e., nature of loss, scope, number of files or records, type of equipment or media, etc.) including the approximate time and location.
3. What safeguards were used, where applicable (e.g., locked briefcase, redacted personal information, password protected, encrypted, etc.).
4. Which SSA components have been involved or affected.
5. Whether any external organizations (i.e., other agencies, law enforcement, press, etc.) have been contacted or contacted the grantee employee.
6. Whether any other reports have been filed (i.e., Federal Protective Service, local police, and SSA reports).
7. Any other pertinent information.

The grantee employee shall use the worksheet (or copy thereof), as amended, following this award condition to quickly gather and organize information about the incident.

e. Once the grantee has notified the primary Government manager or his/her alternate, that manager or alternate will assume responsibility for making the normal report in accordance with Agency procedures.

f. There may be rare instances outside of business hours when the Grant/Cooperative Agreement employee is unable to reach either the primary Government manager or any of the alternates immediately. In such a situation, the grantee employee shall call SSA's Network Customer Service Center (NCSC) at 410-965-7777 or toll free at 1-888-772-6111.

The grantee employee shall document the call with the CAPRS (Change, Asset, and Problem Reporting System) number that the NCSC will assign. He/she shall retain this number and provide it to the primary Government manager, or, if unavailable, one of the alternates to this manager as described above for later contacts with the NCSC when additional or updated information on the incident becomes available.

g. The grantee employee shall limit disclosure of the information and details about an incident to only those with a need to know. The PII reporting process will insure that Government's reporting requirements are met and that incident information is only shared as appropriate.

5. The grantee shall include this award condition in all resulting subcontracts whenever there is any indication that the subcontractor engaged by the grantee and their employees or successor subcontractor(s) and their employees will or might have access to PII furnished by the Government or collected while carrying out project responsibilities under this Grant/Cooperative Agreement.

6. The grantee shall ensure that its subcontractor(s) and their employees or any successor subcontractor(s) and their employees with access to PII furnished by the Government or collected while carrying out project responsibilities under this Grant/Cooperative Agreement know the rules of conduct in protecting and reporting the loss or suspected loss of PII as prescribed in this award condition.

7. Confidentiality of Information:

a. Confidential information, as used in this award condition, means personally identifiable information or data of a personal nature about an individual, such as name, home address, and Social Security number, or proprietary information or data submitted by or pertaining to an institution or organization, such as employee pay scales and indirect cost rates.

b. The grantee/grantee subcontractor must not disclose any confidential information, as defined in paragraph 7.a. of this award condition, without the prior written consent of the individual, institution, or organization.

8. For knowingly disclosing information in violation of the Privacy Act, the grantee and grantee employees may be subject to the criminal penalties as set forth in 5 U.S.C. Section 552(i)(1) to the same extent as employees of the Social Security Administration. For knowingly disclosing confidential information as described in section 1106 of the Social Security Act (42 U.S.C. 1306), the grantee and grantee employees may be subject to the criminal penalties as set forth in that provision.

9. The grantee shall ensure that each grantee employee with access to confidential information knows the prescribed rules of conduct, and that each grantee employee is aware that he/she may be subject to criminal penalties for violations of the Privacy Act and/ or the Social Security Act.

10. Performance of this Grant/Cooperative Agreement may involve access to tax return information as defined in 26 U.S.C. Section 6103(b) of the Internal Revenue Code (IRC). All such information shall be confidential and may not be disclosed without the written permission of the Social Security Administration Grants Officer. For willfully disclosing confidential tax return information in violation of the IRC, the grantee and grantee employees may be subject to the criminal penalties set forth in 26 U.S.C. Section 7213.

11. The Government reserves the right to conduct on-site visits to review the grantee's documentation and in-house procedures for protection of confidential information.

Competency Unit 2 – WIPA Data Collection and Performance Benchmarks

Introduction

Social Security's Office of Research, Demonstration and Employment Support (ORDES) is committed to evaluating the overall WIPA program and the performance of each WIPA project. In order to accomplish this task, ORDES needs accurate and complete information from each project, as captured through the WIPA national data system. The ultimate goal of this data collection is to document the activities, outcomes, and successes of the WIPA initiative and share these results with Social Security and Congress.

The 2017 WIPA Terms & Conditions document provides more details on the following data collection requirements:

- CWICs must collect and report beneficiary information (to include the Social Security number, name, address, and work activity) required by Social Security for evaluation and statistical purposes only.
- CWICs must enter beneficiary data including Personally Identifiable Information (PII) into the Social Security-approved Efforts to Outcomes National WIPA Data Collection System (ETO), and only via the Social Security-furnished laptops.
- Projects aren't authorized to maintain beneficiary PII in any other data collection system.

Purpose of Data Collection in the WIPA Program

WIPA projects are required to enter data on Social Security Disability beneficiaries they serve and the services they deliver in the Efforts to Outcomes (ETO) national WIPA data system. The national WIPA data system serves several important purposes, including:

- Providing a record of the services WIPA projects provide to individual beneficiaries for case management purposes;
- Providing a record of baseline and ongoing changes in a beneficiary's status, as an indicator of service impact;
- Providing a vehicle for beneficiary referrals for WIPA services from the TtW Help Line;
- Providing data for WIPA managers to use in quality assurance or program improvements efforts; and
- Reporting to Social Security's Office of Research, Demonstration and Employment Support (ORDES) on WIPA service delivery and beneficiary outcomes, including performance on WIPA benchmarks.

It's critical that WIPA personnel enter all service delivered to WIPA-eligible beneficiaries into the ETO data system consistently and correctly. WIPA personnel use ETO to document their work and provide the information Social Security needs to evaluate progress on performance benchmarks.

Efforts to Outcomes (ETO)

Overview

Efforts to Outcomes (ETO) is a secure Internet-based environment approved by Social Security for WIPA data entry and case management record keeping. The ETO data system was designed by Social Solutions, a provider of outcomes management software for human services, and this company continues to support the ETO program today.

The ETO system is set up for the WIPA program as an "enterprise," which is a technical term often used to describe a large organization that uses computers. The "enterprise" consists of individual sites for each WIPA project, as well as a separate site for the TtW Help Line. Only the WIPA project personnel assigned to that site can access individual WIPA sites in the ETO system. In addition, the TtW Help Line can't access information about beneficiaries who are enrolled in individual WIPA sites. All of the sites in the WIPA enterprise are compartmentalized. The only connection between sites is that the TtW Help Line customer service representatives

(CSRs)are able to refer beneficiaries directly to WIPA sites. Once the WIPA site accepts the referral, the TtW Help Line CSRs can only access the initial data they entered in the TtW Help Line site. They can't see any additional information entered after the record is part of a WIPA site.

In order to be granted access to a WIPA site in ETO, a staff person must have a Level 5 federal suitability clearance and must have access to a Social Security-furnished laptop. Social Security installs a security certificate on the Social Security-furnished laptop and assigns the authorized user a personal user name and password. WIPA personnel must never share usernames and passwords, under any circumstances!

Because ETO is a secure environment, CWICs can use it to maintain a complete electronic case record for all beneficiaries served. Using ETO in this fashion has several important benefits. First, you can upload and store electronically all documents in the beneficiary record, which reduces the need for paper files. Second, ETO is a completely secure environment that protects all beneficiary PII. ETO is also a valuable source of backup for WIPA data and mitigates the potential loss of data. Finally, ETO provides easy access to all beneficiary documentation across all personnel within a WIPA project.

Structure of WIPA Sites in ETO

Each WIPA site is set up the same way and consists of two separate programs:

1. the WIPA Initial Contact & Demographics program (the I&R program) and
2. WIPA Work Incentives Planning & Assistance program (WIPA Services program).

WIPA personnel enroll all eligible beneficiaries in the I&R program. The I&R program is also used for receiving and processing referrals from the TtW Help Line. CWICs "dismiss" beneficiaries who need individualized, long-term services from the I&R section of ETO and "enroll" them into the WIPA Services part of ETO. Users must always enter beneficiaries into I&R first.

Within each of the two programs, ETO has features that allow users to complete certain tasks.

1. **Enrollment:** Entry of a beneficiary into each program.
2. **Touchpoints:** Forms in ETO that include assessment and efforts. The various forms capture information about the beneficiary's status and changes in status over time, as well as documents all contacts and case notes on the services provided. This is also the feature you use to upload any documents into ETO.
3. **Dismissal:** The feature in ETO that makes a beneficiary's case inactive. WIPA projects can reactivate dismissed beneficiaries.

We will discuss each of these features in greater detail in the sections about documenting services in each program.

Documenting I&R Services

All services that you provide to beneficiaries begin with delivering information and referral. Enter all individuals whom you determine are eligible to receive services from your WIPA project, and actually do receive some services from your project. Careful upfront screening will help you avoid entering anyone in the database who isn't eligible for WIPA services.

Although WIPA projects receive direct referrals from the TtW Help Line via the ETO system, it isn't intended to be a holding place for referrals from other entities prior to delivering a service. Keep in mind that the TtW Help Line has already verified eligibility and provided initial I&R services prior to processing the referral. Eligibility screening and initial I&R services must be delivered prior to entering any of the beneficiary data into ETO for referrals sent from sources other than the TtW Help Line.

Enrolling a beneficiary in the I&R program requires that WIPA personnel complete several key steps to ensure accuracy of your data entry.

Beneficiary Enrollment Steps

1. **Check for potential duplicates:**
   - Use the “Search for current WIPA and BOND and POD Beneficiaries” link in advance of entering anyone.
   - Enter only the nine digits of the beneficiary’s Social Security number; no dashes and no spaces.
   - If no results display, the beneficiary isn’t already enrolled in your program, and he or she is also not a participant in the BOND program.
   - If the result displays the beneficiary as in the site “ZZ-WIPA BOND”, check to see if there’s an end date. Those with end dates are eligible for WIPA.
   - If result displays the beneficiary is current in BOND or POD, do not enter in ETO, he or she is not eligible for WIPA services. Refer the beneficiary to the appropriate call center.

2. **Enroll the beneficiary:**
   - Enroll all beneficiaries who meet WIPA eligibility criteria and for whom you provide at least some services in the I&R program using the “Add a Beneficiary” link on the home page of the WIPA Initial Contacts and Demographics (I&R) program.

3. **Initial Case Notes**
   - Record a touchpoint, or initial case note to document your I&R activity using the “Beneficiary Effort” link on the I&R home page. Best practice is to enter all I&R activity for a complete case record. This is not required in the I&R program, but it is a good way to document your I&R services, conversations with the beneficiary, and any attempts to contact.

4. **Upload**
   - ETO allows you to upload any intake forms or other paperwork related to your I&R services, you can do this by searching for the beneficiary and selecting “View/Record Assessment.”

- You will then click on “Take New Assessment,” and in the dropdown box, select “Upload,” and follow the prompts to complete the upload.
- This feature allows you to securely maintain a full case record in one place.

5. **Dismiss the beneficiary (as appropriate)**
   - Dismiss any beneficiary from I&R prior to enrolling him or her in WIPA Services.
   - Do not dismiss those beneficiaries not moving into WIPA Services; they should remain active in the I&R program.

Once you dismiss a record from I&R and subsequently enroll the beneficiary in WIPA, all the information moves over to the WIPA program and is available as you continue providing long-term individualized services.

Maintaining complete and accurate documentation of your services is reflective of all the hard work you do with beneficiaries.

Documenting WIPA Services

One of the most frequent questions CWICs ask is, “When do I move a beneficiary from I&R into WIPA?” Many times it’s evident that a beneficiary is in need of WIPA-level services right from initial intake. It isn’t uncommon for a beneficiary to be enrolled in I&R, dismissed from I&R, and subsequently enrolled in WIPA all on the same day. One important factor in making the decision to enroll a beneficiary in WIPA has to do with the actual delivery of a WIPA-level service.

There are three questions that you should ask yourself before you enroll a beneficiary in the WIPA program:

1. Has the beneficiary expressed interest in employment now or indicated plans to pursue employment at some point in the future?
2. Has the beneficiary requested or indicated a desire to receive individualized counseling on how paid employment or self-employment will affect his or her benefits?

3. Has the CWIC initiated individualized services, such as receiving benefits verification information from the beneficiary, obtaining signed releases from the beneficiary to assist with verification, or analyzing and interpreting the BPQY?

If the answers are “yes” to these three questions, you should enroll the beneficiary in WIPA services in ETO.

Once you enroll the beneficiary into the WIPA program, you should immediately begin completing the baseline assessment and recording your efforts as appropriate. There is a difference between recording an assessment and recording an effort.

Recording Touchpoints – Baseline Assessment

In the WIPA program, the baseline assessment is the only assessment available, and it is completed only one time. You should start the baseline assessment immediately after you enroll the beneficiary in WIPA services. The baseline captures the information about benefits, education, employment status, and use or recommendation of work incentives at the onset of WIPA services. The baseline will establish a comparison point to measure against when you look at changes in status over time in relation to the services you deliver.

The baseline assessment captures a wealth of information, and it may take more than one sitting to gather and verify all that you need to complete it. Because the baseline assessment captures information about all benefits the beneficiary receives, don’t save it as complete until you have fully verified all benefits.

Once you have completed the baseline assessment and saved it as final, document any changes in benefits, employment status, work incentives usage, living arrangements, marital status, etc. in an effort, or on the demographics page. You would never go back and update the baseline assessment. Always reflect changes in beneficiary status using an effort or on the demographics page.

Recording Touchpoints - Efforts

Just as in the I&R program, you record efforts for each activity you do with or on behalf of a beneficiary as you are providing services. Efforts are essentially case notes, and you should record them every time you have contact with beneficiaries or complete an activity on their behalf.

Examples of activities that are efforts include:

- Leaving a message for a beneficiary.
- Requesting or assisting with benefits verification.
- Mailing the beneficiary additional work incentives information.
- Answering questions about the Ticket program.
- Completing or updating the Benefits Summary & Analysis (BS&A) or Work Incentives Plan (WIP).
- Discussing the BS&A or WIP with the beneficiary.
- Providing assistance with reporting earnings or other information.
- Communicating with VR, EN, or others on the beneficiary's support team.

Efforts not only document a contact and describe what you discussed with the beneficiary, they also document any changes you learned about during the conversation. You will also record the development of the Benefits Summary & Analysis (BS&A) and the Work Incentives Plan (WIP) as efforts.

The Effort form provides options for different activities that you may perform related to development of a BS&A or a WIP. Not only are there several status options, there is also a distinct type of service option at the top of the effort form. When you are recording an effort related to BS&A or WIP development, the type of service would be: Report Writing.
Once you are at the section of the effort form titled 'BS&A Development / Status', there are several distinct options to choose from when recording the BS&A effort tasks. The options include:

- Development of BS&A (writing, peer or TA review, finalization)
- BS&A Completed and Sent
- BS&A Updated
- Reviewed BS&A with Beneficiary

Following is an example of how to properly record BS&A or WIP development efforts.

Effort #1

- Type of Service Provided: Report Writing
- BS&A Development/Status: **Development of BS&A**
- Notes: Began analyzing information gathered, BPQY, and follow up info from WIL. Prepared initial sections of BS&A.
- Time Spent on Contact: 30 minutes

Effort #2

- Type of Service Provided: Report Writing
- BS&A Development/Status: **Development of BS&A**
- Notes: Completed initial writing of BS&A and sent to supervisor for review.
- Time Spent on Contact: 45 minutes

Effort #3 (recorded by the supervisor reviewing BS&A)

- Type of Service Provided: Report Writing
- BS&A Development/Status: **Development of BS&A**
- Notes: reviewed BS&A developed and returned to CWIC with comments.
- Time Spent on Contact: 30 minutes

Effort #4

- Type of Service Provided: Report Writing
- BS&A Development/Status: **BS&A Completed and Sent**
- Notes: Revised BS&A based on comments from supervisor. Mailed to beneficiary.
- Time Spent on Contact: 15 minutes

Effort #5

- Type of Service Provided: Report Writing
- BS&A Development/Status: **Reviewed BS&A with Beneficiary**
- Notes: Phone call with beneficiary to go over any questions about the BS&A. Reviewed calculations sent with BS&A.
- Time Spent on Contact: 60 minutes

In order for your BS&A or WIP to be counted towards your benchmarks, you MUST ensure that you have properly selected the 'BS&A Completed and Sent' option in the 'BS&A Development/Status' field.

When you have finalized the first BS&A and first WIP, you would select "BS&A Completed and Sent" or "WIP Completed and Sent." Record this status only once in the actual effort of documenting the completion and delivery of the BS&A or WIP. Don't continue to select that status option for every effort you record after that point, as it will skew your reporting on that particular measure.

Over the course of delivering long-term, individualized services to beneficiaries, you may update both the BS&A and the WIP multiple times. As you record these subsequent updates, be sure to select the BS&A status or WIP status as "Updated." Each time you develop and update either document, you would complete an effort. Again, you would only select this status at the time of completing an update. Don't continue to check that status for every single effort recorded thereafter, whether related to the BS&A or WIP or not.

Performance Benchmarks

Social Security requires WIPA projects to meet or exceed specific performance benchmarks as identified in the Terms and Conditions that accompanied the WIPA awards. The benchmarks are based on the expectation of 100 new I&R enrollees per funded CWIC full-time employee (FTE) per year. These benchmarks are based on WIPA data from earlier award periods, and reflect what Social Security considers to be realistic goals.

For every 100 new I&R enrollees, you are expected to meet or exceed the following benchmarks:

- 70 percent of I&R enrollees will be subsequently enrolled into WIPA Services

For every 100 beneficiaries enrolled in WIPA Services:

- 100 percent will have a completed baseline assessment
- 60 percent will have a baseline assessment and a BS&A
- 50 percent will have a baseline assessment, a BS&A, and a WIP
- 80 percent with a BS&A will have the BS&A completed within 60 days of WIPA enrollment

Meeting the established benchmarks as a project is important; however, you must remember to focus on delivering the service as Social Security intends it to be delivered. If you are delivering services as described in the manual, you will meet and exceed the Social Security benchmarks.

Strategies for Data Entry Success

Timely and accurate data entry is absolutely critical to meeting your performance benchmarks and to the overall success of your WIPA project. As a CWIC, you have tremendous impact on how your data reflects the actual achievements and successes of your project. There are several strategies you can use to ensure that you document all your good work.

Timely Data Entry

Data entry is just as important as serving beneficiaries and you must complete your data entry in a timely manner. You'll greatly reduce the chance of making data entry errors if you follow the DATE acronym — Do At Time of Event. It won't always be possible to enter your data right at the point of your actual service delivery, but you should do it as soon afterwards as possible. If you aren't able to immediately log into ETO to enter your data right after a beneficiary activity is complete, consider designating specific time within your day to focus solely on entering data. If you set specific "data entry time" in your day, you should ensure that it is uninterrupted time — no phone calls, no emails, etc. Daily data entry not only ensures that you accurately capture all the work you do with beneficiaries, it also helps to reduce the need for intensive data entry at a later date to get caught up. Not only is a backlog data entry a tedious and time-consuming process, it also opens the door for errors in entry that can seriously affect your performance benchmarks.

Follow Proper Steps

- Make sure you are in the right program (I&R or WIPA) before you start entering data.
- Check for duplicates or BOND or POD participation before you add any beneficiary or accept a TtW Help Line referral.

- When searching with the “Search for current WIPA and BOND Beneficiaries” link in the I&R program, enter the SSN without dashes or spaces.
- If you are a CWIC working for multiple WIPA projects, be certain that you are logged into the correct WIPA site.

Document, Document, Document

Remember that the definition of an effort allows you to record every contact or activity you perform with or on behalf of a beneficiary. You should use this feature to document complete case record notes for the services you deliver. Record individual “efforts” for each of your contacts and activities, as appropriate, rather than “bundling” multiple contacts into one “effort.”

You should enter all other documentation that you would normally keep in a paper case file record into the secure ETO data system. You should scan and upload into the beneficiary’s ETO record all documents such as BPQYs, signed releases, BS&As, WIPs, pay stubs, and work incentives documentation.

Pay Attention to Detail

- Be sure that the enrollment date is correct before you add a new beneficiary into either the I&R or in the WIPA program. Incorrect enrollment dates have a negative effect on benchmarks.
- Double check your entries to ensure accuracy of data (look for transposed numbers, letters, misspellings, etc.).
- Carefully check the “Current Assigned Staff’” report regularly to ensure that you properly recorded dates for the following activities: program enrollment, completed baseline assessments, dismissals, and BS&A and WIP efforts. If the dates aren’t sequential beginning with I&R enrollment and through the WIP, there will be impact to the benchmarks.

Ask, Don't Guess

If you have any uncertainty about how to use features in ETO, or what to enter to record your services, or have any questions at all about data entry, ask for assistance. There are multiple avenues for assistance to address your questions. Archived ETO trainings and a multitude of ETO-specific resource documents are available on the VCU NTDC website at https://vcu-ntdc.org/eto/index.cfm.

In addition, VCU has a designated TA Liaison you can contact with all ETO questions. Talking with your project manager about his or her expectations related to data entry is also a great idea. Any time you have any questions related to your data entry activities, it's important to ask for help so that ETO accurately reflects all your work. The next section provides additional information about how to access some of the avenues of assistance noted above.

Accessing Assistance with ETO

You should direct any requests for assistance with technical issues to the WIPA Technical Help Desk. Examples of technical issues include: activating a secure government furnished laptop and ETO user account, access to ETO, difficulty logging in, finding a beneficiary in ETO, missing data, hardware or software issues, technical difficulties with accessing reports in ETO, and how to upload documents.

The Help Desk is available Monday through Friday from 9:00am – 5:00pm Eastern. You can reach them at:

Email: support@wipaccess.com
Phone: 855-816-0890

You should refer all requests for assistance related to entering data on beneficiaries to accurately capture services provided to the VCU ETO Technical Assistance Liaison.

Your ORDES Project Officer can also assist with questions related to ETO. Examples of questions you would ask your Project Officer include:

- How do I get a laptop, or an ETO PIN and password for new staff?
- What should I do when an employee who has access to ETO leaves the project?
- Does the information my project entered in ETO meet Social Security's expectations?
- Will insufficient or inaccurate ETO data entry affect the funding for our project?
- What happens if we don't meet benchmarks?
- A laptop has been lost, stolen, or damaged — what do I do?

Conclusion

Complete documentation of your services reflects all the hard work you do with beneficiaries. If it's not documented, it didn't happen! You must remember that data entry is just as important as the actual services you deliver to beneficiaries. It's critical that you enter all service you delivered into the ETO data system consistently, correctly and accurately to reflect your work, as well as to meet the benchmarks established by ORDES. The ultimate goal of this data collection is to document the activities and successes of the WIPA projects and share these results with Social Security and Congress.

Conducting Independent Research

NTDC ETO Resources:
https://vcu-ntdc.org/eto/additionalResources.cfm

ETO Data Entry Guidance and Tools:

- ETO Data Entry Guidance, Tips, and Reminders, August 2017
- ETO Data Entry Quick Reference Guide, July 2017
- ETO Data Entry Checklist, September 2015
- I&R or Individualized WIPA Services 2017
- ETO and BOND Processes, 2017
- Most Useful ETO Reports – WIPA 2017

Ticket to Work Help Line - WIPA Referrals:

- TtW Help Line - WIPA Referral Protocols - 2017
- TtW Help Line - WIPA Referral Quick Reference Guide 2017
- TtW Help Line - WIPA Referral Protocols: Transition Youth - 2017
- TtW Help Line - WIPA Youth Referral Quick Reference Guide - 2017

Additional ETO Resources:

- Email, PII and Encryption Guidance – July 2016
- Uploading Documents to ETO 2017
- Connecting to the WIPA Help Desk VPN
- Redacting Private Information in PII Documents

Competency Unit 3 – Providing WIPA Services with a Focus on Quality

Introduction

When we talk about "quality" in the context of WIPA services, we mean a measure of excellence or a state of being free from mistakes, deficiencies, and significant variations in work incentives counseling. The delivery of high-quality WIPA services is brought about by strict and consistent commitment to certain standards that achieve uniformity in satisfying specific requirements. Quite simply, it's doing the right things, in the right way, all the time.

Providing excellent WIPA services is something CWICs should strive for every day during each interaction with beneficiaries and other stakeholders. This unit will describe the standards of excellence CWICs are held to in the WIPA program as well as strategies for achieving these standards in your daily work. This unit will also provide specific information to help you check the quality of the services you provide, identify areas in need of improvement, and develop the competencies you need to enhance the quality of your services.

Quality Assurance for WIPA Projects

Although this unit is focused on ways individual CWICs can improve the quality of WIPA services they provide to beneficiaries, there are also quality standards that WIPA projects as a whole need to meet. Primarily, these standards consist of the performance benchmarks contained in each project's cooperative agreement with Social Security. All CWICs should take the time to review these benchmarks, as they represent the minimum outcomes Social Security expects from WIPA projects. Each CWIC employed by a WIPA project must work at a high level of quality for the project as a whole to meet the performance benchmarks.

The benchmarks provide a set of standards that WIPA project managers can use to measure the performance of the project and individual CWICs. These benchmarks should form the basis of a written quality assurance plan that clearly defines the goals and objectives of the project as well as methods for evaluating progress. All WIPA projects should conduct a continuous review of program services and practices to determine what is working well and identify areas that need improvement. Assessing the project's progress toward attaining quality assurance goals and objectives should occur at least quarterly. This provides the manager and CWICs an opportunity to be proactive and identify strategies necessary to improve services.

Engaging both management and direct service staff in the development and maintenance of a quality assurance (QA) plan provides an opportunity for review and discussion of the goals and objectives and engages staff in an ongoing commitment to quality services. In addition, WIPA projects should review and update the QA plan at least annually. The project may need new goals and objectives as CWICs gain more experience and the project makes progress. While WIPA Project Managers are responsible for overall project quality assurance activities, CWICs are responsible for:

- Ensuring they are familiar with their project's QA plan;
- Actively engaging in discussions with their manager and team members in implementing QA activities outlined in the plan; and
- Continuously evaluating and improving their own service delivery practices and outcomes based on CWIC competencies, WIPA contract requirements, and project QA plan goals.

Quality Assurance for CWICs – Understanding the CWIC Core Competencies

It's worth repeating that quality, from a CWICs perspective, is doing the right things, in the right way, all the time. The question then becomes, what are those right things, and what exactly is the right way to do them? Social Security provides helpful direction in this area by establishing a standard set of core competencies that all CWICs are expected to master. These competencies define high-quality WIPA services and drive all of the training and technical assistance provided to CWICs. A CWIC who delivers services in alignment with the standard core competencies will meet Social Security's quality requirements.

Competency Areas

The CWIC core competencies are grouped into seven main categories that correspond with the modules in this manual. Those areas are:

1. Supporting Increased Employment and Financial Independence Outcomes for Social Security Beneficiaries
2. Partnering with Social Security and Community Agencies to Conduct Community Outreach
3. Understanding Social Security Disability Benefits and Associated Work Incentives
4. Healthcare Planning and Counseling
5. Understanding Other Federal Benefits and Associated Work Incentives
6. Providing Effective WIPA Services that Promote Employment and Increase Financial Independence
7. Understanding WIPA Standards, Data Collection Requirements, and Quality Considerations for CWICs

Within each of these seven areas, there are very specific performance standards or competencies for which Social Security holds CWICs accountable. These competencies are listed at the beginning of each module. We will review each set of these competencies further on in this unit and discuss specific strategies CWICs can use to evaluate the level of proficiency they demonstrate in each competency area.

Competency Proficiency

It's important to understand that Social Security doesn't expect CWICs to achieve full competence immediately — certainly not after completing the initial training and certification process. During the CWIC initial training and certification process, the core competencies for CWICs are taught in such a way as to provide a basic level of understanding. This ensures that: (1) CWICs are able to immediately begin to provide services (with some support) after successfully completing all competency assessment activities and; (2) all CWICs are certified as minimally competent on every competency. It's important to understand that initial certification merely represents attaining the most basic minimum skill level permitted to begin providing WIPA services. CWICs aren't considered to be fully “proficient” at this level, but they should have enough knowledge to provide simple work incentives counseling and avoid harming beneficiaries. WIPA personnel need to acquire considerable experience and receive ongoing training, technical assistance, support, and mentoring to develop intermediate competency, much less to eventually reach an advanced or expert skill level.

CWICs need to view the complete list of CWIC competencies as something they gradually attain over time with experience, supplemental training, and technical assistance. While they may attain some of the individual competencies by classroom training in a relatively short period, they may acquire others only experientially — by doing the real work of serving beneficiaries. CWICs can acquire all of the essential competencies at a beginning level initially, then deepen and expand them over time.

Social Security views CWIC proficiency as a continuum, as described below:

- **Novice Proficiency**: At the nearest end of the competency continuum are beginning-level CWICs who have just completed initial training and certification activities with less than two years tenure in the position. These individuals are novices at conducting independent research and have very limited experience actually facilitating the use of work incentives. They tend to be weakest in advising beneficiaries on healthcare issues and in dealing with the other federal benefit programs. CWICs with basic proficiency typically are just beginning to form collaborative relationships with community partner agencies and may have a fairly weak grasp of the employment services system for persons with disabilities.
- **Intermediate Proficiency**: In the middle of the continuum at the broadest part of the bell-shaped curve are those with intermediate CWIC skill levels. These individuals have completed certification and have at least three years of tenure in the CWIC position. CWICs at this level have typically completed various supplemental trainings and have accessed technical assistance on a variety of issues. Individuals at this level may have a moderate level of skill in facilitating the use of work incentives, providing counseling on healthcare issues, and in understanding the other federal benefit programs. Intermediate-level CWICs are generally aware of the full

array of employment services and supports available in their area and have established collaborative working relationships with key community partner agencies.

- **Advanced Proficiency**: At the far end of the continuum are the fully proficient advanced-level CWICs. These individuals typically have five or more years of experience providing work incentives counseling, are proficient at conducting independent research on most issues, and have an understanding of the most complex work incentives issues. They tend to be individuals who avail themselves of all training opportunities and have accessed technical assistance many times. They are highly experienced in facilitating the use of work incentives and have developed a deep understanding of health insurance issues pertinent to their state. These individuals have a solid grasp on how employment affects the other federal benefits programs and have developed very functional collaborative relationship with all key community partner agencies, including Social Security. CWICs with advanced proficiency are also skilled at conducting outreach and providing services to underserved populations. In some projects, a CWIC with advanced proficiency may be designated as "Lead CWIC" or "Senior CWIC."

The ultimate goal for any CWIC is to achieve advanced proficiency in each of the seven competency areas, but this goal takes a great deal of planning, time, and effort to achieve. To reach the master CWIC level, you must be able to evaluate where you are on the proficiency continuum in each competency area and pursue training and technical support to enhance your knowledge and skill in areas of weakness. If you take the time to honestly assess your competency, you'll have a much clearer idea about where you need to invest time in professional development. Remember, CWICs are now required to complete a minimum of 18 continuing education credits (CCCs) annually to retain CWIC certification. This requirement reflects Social Security's awareness that a CWIC's job is extremely difficult and takes a great deal of training and experience to master. **Developing and maintaining a high level of professional competence is the number one responsibility you have in ensuring the quality of services your WIPA project provides.**

Review of the CWIC Core Competencies

Competency Area 1: Supporting Increased Employment and Financial Independence Outcomes

A fully proficient CWIC consistently demonstrates the following competencies in this area:

- Describes recent governmental efforts to increase community-based paid employment outcomes for people with even the most significant disabilities and current best practices in employment services and supports for persons with disabilities.
- Demonstrates knowledge of current Social Security efforts to promote employment and increase financial independence for disability beneficiaries, including the Ticket to Work and Self-Sufficiency Program, Social Security/Vocational Rehabilitation Reimbursement program, Work Incentives Planning and Assistance (WIPA) program, Protection & Advocacy for Beneficiaries of Social Security (PABSS) program, and demonstration projects sponsored by Social Security or other federal agency operating in the service area.
- Describes to beneficiaries their rights and opportunities under Sections 503 and 504 of the Rehabilitation Act, the Americans with Disabilities Act (ADA), federal Schedule A employment, and other programs that provide protections to job-seekers and employees with disabilities.
- Demonstrates knowledge of state VR agencies, American Jobs Centers, and other public or private programs that fund or provide employment services for Social Security disability beneficiaries, including the local employment services and supports available to assist Social Security beneficiaries in choosing, planning, securing, and maintaining employment over time.

Strategies for Evaluating your Level of Proficiency in this Area

- A good way to evaluate how well you understand federal hiring initiatives is to measure how often you discuss these initiatives with beneficiaries. Look back over the Benefits Summary & Analysis reports you developed over the past 6-12 months. Did you identify good candidates for these programs? Did you include a discussion of these programs during your counseling and provide specific information on how to participate in these programs? Did you capture this discussion in the BS&A report under the section on employment services and supports?
- The best way to assess how well you understand the disability services community, especially those agencies that provide employment services and supports, is to look at how many referrals you make for these services. Are you consistently checking to see if beneficiaries have unmet needs in this area? Do you discuss service options with beneficiaries and include information about these options in the BS&A reports or other correspondence? Have you researched and developed collaborative relationships with community agencies that provide employment support services in order to facilitate referrals?

Competency Area 2: Partnering with Social Security and Community Agencies to Conduct Community Outreach

A fully proficient CWIC consistently demonstrates the following competencies in this area:

- Designs and implements outreach strategies targeted toward transition-age youth and young adult beneficiaries, including individuals in secondary and post-secondary education, school-to-work transition, and vocational training programs to increase access to and benefit from WIPA services and the Ticket to Work program.
- Develops and implements outreach strategies designed specifically to increase WIPA service delivery to traditionally underserved populations within the catchment area such as veterans with disabilities, homeless individuals, beneficiaries in rural or dense urban areas, and individuals from diverse ethnic or linguistic backgrounds.

- Collaborates with Employment Networks (ENs) or other public and private community-based organizations (e.g., state VR agencies, American Job Centers) through interagency agreements or other information or resource sharing mechanisms to support employment outcomes and increased financial stability for beneficiaries.
- Works collaboratively with the Ticket Program Manager (TPM) and the TtW Help Line to conduct outreach to Social Security disability beneficiaries who are eligible for the Ticket to Work program. Works collaboratively with the TtW Help Line to ensure timely response to referrals, and effective and accurate responses when referred beneficiaries aren't appropriate for services.
- Interacts effectively with Social Security field office personnel and Area Work Incentives Coordinators (AWICs) in the provision of WIPA service.
- Collaborates with local financial services and asset development agencies, such as banking, financial education, credit repair, Individual Development Account (IDA) programs, tax assistance and other services, to promote the successful participation of beneficiaries in programs designed to increase financial stability.

Strategies for Evaluating your Level of Proficiency in this Area

- Have you checked to see if your agency has a written outreach plan? What are you doing to make sure you are targeting your limited outreach time to the high-priority populations identified by Social Security? A good way to determine if your targeted outreach is working is to see how many beneficiaries you are serving are members of these groups. If the penetration rate seems low, you should brainstorm with other members of your team to come up with ideas for improvement. Another important measure in this area is the number of ineligible or inappropriate referrals you receive. If your outreach isn't effective in terms of explaining what WIPA services are and which beneficiaries the program is intended to serve, you'll waste a lot of time on people who aren't a high priority. This is an indicator that you need to do a better job educating your primary referral sources.
- Working collaboratively with the local field offices (FO) and the AWICs is extremely important and is a requirement in the WIPA

Cooperative Agreement. Have you developed relationships with the WILs in each of the FOs in your service area? Are you able to contact the WILs and the AWIC directly when needed? Have you introduced yourself to FO managers and spent time understanding how those managers want you to work with FO personnel?

- Under the current WIPA service model, Social Security expects WIPA projects to work in close collaboration with the TtW Help Line. Do you handle referrals from the TtW Help Line correctly and in the required time frame? When you have questions about working with TtW Help Line personnel, do you request assistance from your VCU Technical Assistance Liaison?
- Keep in mind that Social Security sees the WIPA program as part of a broader effort to improve the financial stability and independence of beneficiaries. Do you know the local resources for financial services and asset development agencies? Do you have a working relationship with these agencies? A good way to measure your success in this area is to determine how many referrals you have made for services that support financial stability and independence. How often are you discussing these issues with beneficiaries? Are you including discussion of financial independence in your BS&A reports? Do your WIPs include action steps related to improving financial stability and independence?

Competency Area 3: Understanding Social Security Disability Benefits and Associated Work Incentives

A fully proficient CWIC consistently demonstrates the following competencies in this area:

- Demonstrates knowledge of the Social Security disability evaluation and continuing disability review (CDR) process, including eligibility criteria for Title II disability and SSI programs and other non-disability programs administered by Social Security.
- Demonstrates the ability to analyze the effects of wage employment on Title II and SSI disability benefits including eligibility and cash payment status.
- Demonstrates the ability to individualize and apply the relevant work incentives using complex, multi-phase case scenarios involving Title II disability benefits, SSI, and concurrent beneficiary

examples (e.g., PASS, Student Earned Income Exclusion, Blind Work Expenses, TWP/EPE, Subsidy & Special Conditions, IRWE, etc.)

- Assists beneficiaries to participate in the Ticket to Work program by providing counseling on Ticket eligibility, assignment and unassignment procedures, reporting requirements, timely progress requirements, and making referrals to Employment Networks (ENs) and state Vocational Rehabilitation (VR) Agencies.
- Demonstrates the ability to analyze the effects of self- employment on Title II and SSI disability benefits, including knowledge of Social Security and IRS regulations that define self-employment, the manner in which business structures affect Social Security benefits, methods for determining earnings from self-employment, and the application of work incentives that may assist beneficiaries to achieve or maintain a self-employment goal.
- Demonstrates the ability to advise beneficiaries regarding their rights and protections under the Social Security disability rules and regulations, including Expedited Reinstatement (EXR), Section 301 payments, and appeals.

Strategies for Evaluating your Level of Proficiency in this Area

- Technical competence on the Social Security disability benefit programs and their associated work incentives is only built with time and experience. All new CWICs struggle with developing proficiency in this complex and ever-changing area. A key strategy is to have someone with advanced proficiency check your work. Ask an experienced co-worker or manager to debrief with you after you meet with beneficiaries to make sure you didn't miss anything or provide incorrect information.
- If you feel uncertain about how a particular benefit is affected by employment or how to apply a work incentive, reach out to your VCU Technical Assistance Liaison for help. There's no such thing as a "dumb" question – your liaison is there to help you build competence. It's perfectly acceptable to tell a beneficiary that you need to conduct research before you can answer a question. It's always better to get technical support when you are unsure of something than to provide incorrect information. You need to know what you don't know and get help when you need it.

- Your VCU Liaison is also available to review BS&A reports and offer suggestions for improvement. This is an excellent way to build technical proficiency. Your liaison will identify areas in which you show confusion and will offer specific advice about how to improve your understanding of key concepts and provisions. There are lots of archived training sessions on the VCU NTDC website you can review at your convenience, and a great many resource documents are available to supplement the information provided in the manual. Building professional competence is really a matter of investing time in the process.
- Social Security views the WIPA program as an essential component of the larger Ticket to Work initiative. CWICs need to provide basic information about the ticket program to all beneficiaries who are employed or actively pursuing employment — particularly those who want to work at a level to preclude cash payments. Highly proficient CWICs consistently identify beneficiaries who are good ticket candidates and document discussion of the ticket program in BS&A reports. Another way to evaluate your competency in this area is to measure how many of the beneficiaries you serve have their ticket assigned or in use. Are you checking for this with every beneficiary you serve? Are you offering specific counseling on the ticket program to individuals who are good candidates for ticket assignment? Are you following up with beneficiaries to help resolve problems with ticket usage?

Competency Area 4: Healthcare Planning and Counseling

A fully proficient CWIC consistently demonstrates the following competencies in this area:

- Demonstrates knowledge of the availability and eligibility for all state Medicaid programs including categorically eligible Medicaid group, optional Medicaid groups, Medicaid buy-in programs, Medicaid waiver programs, and CHIP, as well as Health Insurance Premium Payment programs funded by Medicaid.
- Demonstrates an understanding of eligibility for and the operations of the federal Medicare program including Medicare Parts A (Hospital) and B (Medical), Medigap insurance plans, the Medicare

Prescription Drug Program (Part D), and Medicare for Qualified Disabled and Working Individuals (QDWI) Program , as well as the interaction of Medicare with other public and private health insurance.

- Demonstrates knowledge of the key components of the Affordable Care Act (ACA) applicable to Social Security disability beneficiaries and their families and the relationship of ACA provisions to multiple public health insurance programs for individuals with disabilities.
- Demonstrates an understanding of eligibility for and key provisions of TRICARE and the VA healthcare programs for veterans and how these programs interact with Medicare and Medicaid.
- Demonstrates knowledge of regulations protecting the healthcare rights of persons with disabilities starting new jobs or changing jobs.
- Demonstrates an understanding of the complex interactions between private healthcare coverage and public health care programs as well as key considerations in counseling beneficiaries as they make choices regarding health coverage options and opportunities resulting from employment.
- Demonstrates the ability to provide effective counseling strategies to support beneficiaries in understanding available healthcare options and making informed healthcare coverage choices throughout the employment process.

Strategies for Evaluating your Level of Proficiency in this Area

- This is a critically important competency area for CWICs, but also one of the most difficult to master. While the VCU NTDC provides training on the federal Medicaid rules, there is significant variance in how states design and administer this program. WIPA projects are responsible for getting training on the state-specific rules, but this training can be very difficult to locate and arrange. Have you met with your manager and colleagues to strategize on getting the Medicaid training you need? Have you identified the Medicaid experts in your state and requested assistance from them? Have you located your state’s Medicaid manual, and do you refer to that manual when you have questions?
- Medicare is also a complex program, but, fortunately, the federal government administers it, so there is no state-to-state variance.

Have you read the Medicare unit in this manual carefully and completed the Medicare Web Course? Remember, there are Medicare Savings Programs (MSPs) and the Low-Income Subsidy (LIS) that can help beneficiaries pay for the out-of-pocket expenses common in the Medicare program. Are you sure you understand how these programs operate in your state and how paid employment affects them? Have you participated in supplemental trainings on Medicare and associated programs to ensure you have a solid understanding in this area?

- CWICs are required to evaluate a beneficiary's healthcare needs beyond the Medicaid and Medicare programs. When you counsel beneficiaries, are you checking for enrollment in other healthcare programs such as TRICARE, the VA Healthcare System, the ACA Healthcare exchanges, or other forms of private health insurance? A good way to measure how well you are doing in this area is to look back at your BS&A reports to see how often you are mentioning other options besides Medicare and Medicaid. Don't forget that your VCU Technical Assistance Liaison is a great resource for helping you think through possible healthcare options.
- Healthcare counseling with beneficiaries requires that you customize your approach to fit the needs of each individual. Do you provide individualized analysis and counseling as it relates to the healthcare programs and associated work incentives? If your BS&A reports always contain the same language, that might be an indicator that you need to improve in this area. Are you carefully comparing the costs and benefits of the various healthcare options so that beneficiaries are able to make informed choices? Are these cost-benefit comparisons clearly described in your BS&As?

Competency Area 5: Understanding other Federal Benefits and Associated Work Incentives

A fully proficient CWIC consistently demonstrates the following competencies in this area:

- Demonstrates knowledge of other federal benefit programs and associated work incentives, including TANF, SNAP, HUD housing subsidies, Workers' Compensation, Unemployment Insurance benefits, Veterans benefits, and other benefit programs and the interaction of these programs with Social Security disability benefits.

- Demonstrates an understanding of state-specific regulations and policies that affect publicly funded benefit programs and the administration of these programs in the home state.
- Demonstrates the ability to analyze the effect of employment on program eligibility, cash payment status, and benefit levels for TANF, SNAP, HUD housing subsidies, Workers' Compensation and Unemployment Insurance benefits, Veterans benefits, and other benefit programs.
- Demonstrates the ability to understand the key components of federal and state IDA programs and support beneficiaries to use these programs to achieve employment outcomes, including the treatment of IDAs within the Social Security disability benefits programs and ways in which beneficiaries may use work incentives such as PASS in conjunction with participation in an IDA program.

Strategies for Evaluating your Level of Proficiency in this Area

- In order to develop proficiency in understanding how the state-specific benefit programs operate, CWICs must develop relationships with staff members at the various agencies that administer these programs. Have you identified knowledgeable contact people at each agency, and have you introduced yourself to these people? Have you checked with your manager to see if there are state-level experts your project can get help from when questions arise?
- Remember that the information about other federal benefit programs in your manual only reflects the federal rules governing these programs. States vary significantly in how they administer these programs, so you need to learn the rules for your state. Have you reached out to the administering agencies to request training? Have you located the policy and procedure manuals for the various benefit programs that you can refer to when you have questions? Developing competency on the state-specific rules for the various benefit programs requires effort from your entire WIPA project team. If there is more than one WIPA project in your state, it's a good idea to work together to build competence in this area. Sharing contacts and resources for each benefit program helps all

of the beneficiaries served and saves all of the CWICs in your state valuable time.

- Do you provide individualized counseling to beneficiaries on the effect of work on other federal, state, or local benefit programs and their associated work incentives? If your BS&A reports all contain the same generic language, that is an indication that you need to improve in this area.
- Do you know what IDA or other asset development programs are available in your state or area? Do you provide information to beneficiaries about the availability of these programs? Do you know how IDA programs interact with Social Security disability programs?

Competency Area 6: Providing WIPA Services that Promote Employment and Increase Financial Independence

A fully proficient CWIC consistently demonstrates the following competencies in this area:

- Demonstrates the ability to effectively deliver WIPA services using the “Employment Progression” approach characterized by “just-in-time” provision of services that are customized to meet the unique work incentive counseling needs of beneficiaries at the contemplative, preparatory, job search, and employment stages of the employment continuum.
- Demonstrates the ability to identify WIPA-eligible beneficiaries, triage services to high priority beneficiaries, conduct initial information gathering interviews, and verify all benefits received.
- Develops comprehensive individualized Benefits Summary and Analysis (BS&A) reports and customized Work Incentives Plans (WIPs) that reflect counseling contained in the BS&A.
- Demonstrates the ability to facilitate the use of necessary and appropriate work incentives (IRWE, BWE, SEIE, Subsidies, PASS, EXR, etc.) at each stage of the beneficiary’s employment process, which supports his or her achievement of employment and financial stability goals.
- Demonstrates the ability to deliver proactive ongoing WIPA services as a collaborative member of each beneficiary’s employment

support team that facilitates the achievement of paid employment or self-employment, supports employment retention over time, fosters future career advancement, and increases financial independence.

- Demonstrates the ability to counsel beneficiaries on the importance of reporting earnings to Social Security, strategies for earnings reporting, and tracking their progress through the TWP, SEIE, and other work incentives.
- Practices effective time management and efficient service delivery techniques, which ensures WIPA projects direct staff resources toward high-priority WIPA candidates and focus on delivering individualized WIPA services that promote employment and increase financial stability.

Strategies for Evaluating your Level of Proficiency in this Area

- You need to be clear about who is eligible for WIPA services, and of those eligible individuals, who does Social Security want you to prioritize for services? Look back at the new cases you have opened in the past few months. A good way to evaluate how you are doing in this area is to invite your Project Manager or a colleague to review your records. Do you consistently identify beneficiaries who are high priority for services?
- Do you have procedures for verifying all benefits beneficiaries receive? Do you follow those procedures consistently? Have you received training on effective benefits verification strategies?
- Are the BS&As and WIPs that you develop individualized to match the unique circumstances of each beneficiary? Do you include specific information about applicable work incentives?
- Social Security expects CWICs to provide follow-up services to high-priority beneficiaries — especially those who are employed. One good way to measure this is by looking at how many WIPs you are developing. Do you provide proactive ongoing follow along? Does the follow-along plan include other members of the beneficiary’s employment support team?
- Do you counsel beneficiaries on how to report earnings and work incentives to the applicable agencies? Do you follow up to make sure employed beneficiaries are reporting their earnings correctly?

- Are you spending your time working with beneficiaries who are high priority? Are you providing individualized counseling to these beneficiaries?

Competency Area 7: Understanding WIPA Standards, Data Collection Requirements, and Quality Considerations for CWICs

A fully proficient CWIC consistently demonstrates the following competencies in this area:

- Demonstrates an understanding of the minimum compliance requirements for WIPA projects as stated in the WIPA Cooperative Agreement.
- Performs data collection duties as required by Social Security using the WIPA National Data System (Efforts to Outcomes or ETO).
- Provides WIPA services in a manner that strictly protects beneficiary personal information and adheres to Social Security's data security requirements.
- Identifies and describes indicators of high-quality WIPA services and demonstrates an understanding of the CWIC's role in achieving these indicators.
- Demonstrates the ability to provide culturally sensitive and competent work incentive counseling services that enable the beneficiary to access and benefit from the WIPA program, regardless of the need for communication or program accommodations for persons with disabilities, diverse cultural or linguistic backgrounds, or geographic location of residence.
- Consistently uses an array of available training and technical support resources (POMS and other online resources, WIPA project networking, assistance from Regional TA Liaison, VCU NTDC supplemental trainings) in order to develop and enhance professional knowledge and skills in order to improve the quality of WIPA services.

Strategies for Evaluating your Level of Proficiency in this Area

- You are already doing something important to gain an understanding of your role in providing quality WIPA services — you are reading this module of the WIPA training manual. This module explains your responsibility in this area and clearly outlines what Social Security expects from you in terms of quality work. If you follow the directions in this manual, you will provide a valuable service to eligible beneficiaries and meet your obligations to your funder. WIPA projects are only as strong as each individual staff member. Each CWIC must dedicate him or herself to delivering services in a quality manner in order for WIPA projects and the national WIPA initiative to be successful.
- Protecting the confidentiality and privacy of those you serve must be your number one concern at all times. Have you read Social Security's policies on protecting PII? Does your agency have protocols in place for protecting PII? Do you follow those protocols consistently?
- Do you know how to use ETO? Have you received the training you need to be competent in using the data system? Do you stay current on updated processes and procedures related to data entry? Are you consistently entering information in the correct manner and on a regular basis? When you have questions about using ETO, do you know where to access help, and do you avail yourself of help when needed?
- Does your agency have protocols for how to ensure that services are provided in a manner that is accessible to all beneficiaries regardless of disability?

Improving the Quality of your Work

CWICs can improve the quality of their daily work by taking three simple steps:

1. **Make quality a priority:** To really be good at your job, you have to believe that it's important to deliver high-quality services. You have to WANT to do the right things, in the right

way, all the time. Excellence must be your goal every time you interact with a beneficiary.

2. **Seek honest evaluation of your work, and be willing to accept feedback:** In order to improve the quality of your work, you have to recognize where improvement is needed. It takes maturity and honesty to go through this type of evaluation. CWICs have several avenues for getting constructive feedback, which include WIPA Project Managers, co-workers with advanced proficiency, and VCU NTDC Technical Assistance Liaisons. CWICs who want to improve must actively seek out appraisals of their work and be willing to listen to and act on criticism.
3. **Access the training and technical support you need to build competence:** Social Security provides CWICs with an incredible amount of training and technical support through their contract with VCU's NTDC as well as support provided by the Project Officers at ORDES. A CWIC who is motivated to build competence has a great many resources at his or her disposal including live teleconference training, archived training, scores of resource documents and tools, independent research using the POMS, and individualized technical assistance provided by phone or email. CWICs who consistently avail themselves of training and technical support develop the knowledge base and counseling skills necessary to deliver excellent WIPA services.

Conclusion

Your responsibility for providing high-quality WIPA services is something you must take very seriously. This is because providing incomplete or incorrect information can cause real harm to beneficiaries. In order to provide excellent WIPA services, you must focus on developing full competency in the seven key areas we have described in this unit. If you invest your time and energy in building competency and delivering WIPA services as described in this manual, you will meet Social Security's expectations with regard to quality.

Competency Unit 4 – Providing WIPA Services that Accommodate Disability and Respect Cultural Differences

Introduction

Social Security requires WIPA projects to provide services that are fully accessible and usable to all eligible population groups. This includes the many disability groups, as well as groups with cultural and linguistic differences. The 2017 WIPA Terms and Conditions document states the following:

> *"WIPA grantees must have accessible facilities, materials, meeting places, and communication. This includes for example: ensuring physical, transportation, language, and material access to all beneficiaries in their service area. WIPAs shall be mindful of the following:*
>
> - *Monitoring and modifying physical access to barrier-free offices and meeting places;*
> - *Availability of offices in locations with access to public transportation;*
> - *Distance communication methods accessible to individuals requiring adaptive technology;*
> - *Creating websites and other electronic information and communication options that meet or exceed compliance with Section 508 of the Rehabilitation Act;*
> - *Providing materials in alternate media such as Braille, large print, or other electronic formats;*
> - *Providing services and publications in alternate languages including sign language; and*
> - *Providing services and publications in languages that reflect the demographic distribution of the service area."*

Clearly, Social Security expects WIPA projects to find ways to attract and accommodate ALL beneficiaries who are eligible for WIPA services. This unit examines the numerous responsibilities WIPA projects have in this regard and provides specific strategies for complying with accommodation requirements.

A Word about Disability Awareness and Cultural Sensitivity

CWICs encounter individuals from the broadest spectrum of American society in the performance of their duties. As a CWIC, you need to have an understanding of the various disabilities and must also demonstrate respect for diverse ethnic, cultural, and linguistic traditions. It's virtually impossible to serve such an expansive beneficiary base in an inclusive manner without formal training.

Given that the subject matter is far too expansive to be adequately covered in the initial CWIC training and manual, WIPA projects will need to access additional training in these areas from sources outside of the VCU NTDC. There are many affordable sources for this training available in a variety of modalities, including classroom-based training and Internet-based courses. WIPA Project Managers are encouraged to research available options and to make arrangements for all staff to receive this training.

Performing Outreach Activities that Accommodate Disability and Respect Cultural and Linguistic Differences

If WIPA projects hope to serve all of the diverse subgroups within the larger Social Security disability beneficiary population, they'll need to make a concerted effort to connect with these groups through targeted outreach activities.

Tips for Conducting Outreach to Disability and Cultural Subgroups

- You need to have a solid understanding of the local communities you serve in terms of ethnic and cultural subgroups that may exist. Similarly, you need to be aware of the local agencies that serve hard-to-reach or low-incidence disability groups. Invest the time necessary to get to know your local service area so that you don't inadvertently ignore disability and cultural subgroups.

- Disability and cultural subgroups are hard to reach when communication or transportation barriers exist. This means that you must make notices of outreach activities and other marketing information available in alternate formats or in different languages. Furthermore, you must make this information readily available in the neighborhoods where the target population lives, works, and shops. Whenever possible, you should hold outreach activities within the local neighborhoods and at times when you could expect members of the targeted group to attend.
- You must establish relationships with persons of influence within the isolated communities help spread the word about the value of WIPA services. These persons of influence will vary depending on the community, but could include religious leaders, elected officials, community leaders, prominent business people, teachers, or respected service providers.
- You need to make a concerted effort to understand cultural traditions or values. This may affect how you organize outreach activities and provide WIPA services. To the extent that outreach activities reflect an understanding and accommodation of cultural traditions, beneficiaries within that culture will be more likely to attend and participate.
- When WIPA projects organize outreach events to target a specific disability or ethnic group, it's important to be prepared to communicate with attendees. This means that a sufficient number of interpreters must be on site. If a local area has a large population that speaks another language or requires some other communication accommodation, the WIPA project should make an effort to hire bilingual staff.
- WIPA projects need to make sure all outreach activity occurs in facilities that are fully accessible for individuals with mobility limitations or sensory impairments such as blindness. Project personnel should visit facilities prior to the outreach event, and a qualified individual should thoroughly assess accessibility.
- You can arrange accessibility reviews by contacting the local Center for Independent Living or State VR agency.
- You should have a selection of informational materials in alternate formats or languages on hand at outreach events targeted toward

hard-to-reach groups. Make sure WIPA project contact information is available in an understandable format for ALL beneficiaries.

Providing Accessible Outreach Presentations

If the outreach activity involves making a presentation to an audience, there are some additional considerations to take into account. The following tips come from "Disability Etiquette – Tips for Speaking Engagements" by Beth Loy, Ph.D., a document that is available from the Job Accommodation Network at http://www.jan.wvu.edu/media/etipresent.html.

- When talking to a person with a disability, look at and speak directly to that person, rather than through a companion or attendant.
- When referring to a person with a disability, make reference to the person first, then the disability. Use "people first" terminology such as "a person with a disability" rather than a "disabled person."
- To accommodate individuals with learning disabilities and vision impairments when using presentation slides, be sure to explain what is on the slide. Highlight points and convey enough information to describe pictures to someone who has no vision. Also, provide information in several types of alternative formats (tapes, Braille, CD). Watch for inadequate lighting that inhibits communication by people who have hearing and learning limitations.
- Don't touch a service animal, or the person the animal assists, without permission. Noises may distract the animal from doing his or her job, and feeding the service animal may disrupt the animal's schedule.
- Listen attentively when talking with a person who has a speaking impairment. Keep your manner encouraging rather than correcting. Exercising patience rather than attempting to speak for a person may be helpful. When necessary, ask short questions that require short answers or a nod or a shake of the head. Never pretend to understand if you are having difficulty doing so.
- To get the attention of a person with a hearing impairment, tap the person on the shoulder or wave your hand. Look directly at the person, and speak clearly, naturally, and slowly to establish if the

person can read lips. Not all individuals with hearing impairments can lip-read. Those who can will rely on facial expressions and other body language to help in understanding.

- Show consideration by placing yourself facing the light source and keeping your hands away from your mouth when speaking. Shouting probably won't help, but written notes may. To facilitate conversation, be prepared to offer a visual cue to someone with a hearing impairment or an audible cue to someone with a visual impairment, especially when more than one person is speaking.
- When talking with a person who uses a wheelchair or scooter for more than a few minutes, use a chair whenever possible in order to place yourself at the person's eye level. This facilitates conversation. Don't move a wheelchair, crutches, or other mobility aid out of reach of a person who uses them. Also, don't push a mobility aid without first asking the occupant if you may do so, lean on a person's mobility aid when talking, or pat a person who uses a wheelchair or scooter on the head. Make sure that audiovisual equipment doesn't block the view of people who use accessible seating. Clearing the aisles of excess debris for the use of mobility aids may be useful. Be alert to the possible existence of architectural barriers.

When in doubt about the best way to accommodate the needs and preferences of any particular beneficiary group, ask members of this group for advice. WIPA projects need to be prepared to receive constructive criticism and make every reasonable effort to implement the suggestions offered.

Ensuring Unfettered Access to WIPA Services

For those of us who haven't experienced a disability, it's sometimes difficult to recognize or understand all of the barriers people with disabilities face just accessing services in the community on a day-to-day basis. The word "accessibility" has many meanings when we apply it to individuals with disabilities.

Physical Accessibility and Universal Design

Perhaps the most common usage of the word "accessibility" refers to physical accessibility of facilities where services are provided. When applied to facilities, the word "accessible" refers to spaces that are free from architectural barriers. Architectural barriers are physical features that limit or prevent people with disabilities from obtaining the goods or services that are offered. These barriers can include parking spaces that are too narrow to accommodate people who use wheelchairs; steps at the entrance or to part of the selling space of a store; round doorknobs or door hardware that is difficult to grasp; aisles that are too narrow for a person using a wheelchair, electric scooter, or a walker; a high counter or narrow checkout aisles at a cash register; and fixed tables in eating areas that are too low to accommodate a person using a wheelchair or that have fixed seats that prevent a person using a wheelchair from pulling under the table.

The key to making WIPA services physically accessible is to follow the rules of "universal design." This simply means that the physical layout or design of buildings or spaces is usable by anyone and everyone — no matter what! For WIPA Project Managers who are unsure whether their location is truly accessible to all beneficiaries regardless of disability type, a great place to start is by having an accessibility review that identifies the aspects of the buildings, physical environment, and surrounding areas that might pose barriers.

Getting Help with Accessibility

To learn more about universal design and how to make changes to better accommodate beneficiaries with disabilities, contact the nearest Center for Independent Living (CIL) or your State Independent Living Council. If there is no designated independent living agency in your area, ask for assistance from the State Vocational Rehabilitation agency. You can also obtain assistance from the regional ADA Technical Assistance Center. The National Institute on Disability and Rehabilitation Research (NIDRR) has established 10 regional centers to provide information, training, and technical assistance to employers, people with disabilities, and other entities with responsibilities under the ADA. The centers act as a "one-stop" central, comprehensive resource on ADA issues in employment, public services, public accommodations, and communications. Each center works closely with local business, disability, governmental, rehabilitation, and other professional networks to provide ADA information and assistance. Programs vary in each region, but all centers provide the following:

- Technical assistance
- Education and training
- Materials dissemination
- Information and referral
- Public awareness
- Local capacity building

In addition to ADA services, the centers assist individuals and entities in better understanding related disability legislation that may affect their rights or responsibilities. The centers can typically provide information on the Rehabilitation Act, the Family Medical Leave Act, the Workforce Innovation and Opportunity Act (WIOA), and others. To find the center that serves your area, visit https://adata.org/.

Overcoming Communication Barriers

Accessibility also refers to having referral, intake, and interview processes that don't pose barriers to people who experience disabilities or those who may not speak or understand English. In some cases, it may mean arranging for an interpreter to help beneficiaries for whom English is a second language. In addition, some beneficiaries who have hearing or speech disabilities may need to communicate with WIPA personnel without using speech. The method of communication will vary depending upon the abilities of the beneficiaries and on the complexity of the communications that are required. For example, some people who are deaf are able to use speech but are unable to understand words spoken by others, while other people who are deaf aren't able to communicate with speech. People with speech or hearing disabilities may require extra time to complete their message or extra attention by staff to understand what is being said. When communication by speech isn't possible, simple questions, such as the type of benefits received, you may handle with pen and paper by exchanging written notes or a mixture of speech and written notes. Staff should be aware of the need to use notes or both speech and communication with pen and paper. It's appropriate to ask the beneficiary what he or she prefers for simple communication.

Interpreting Services

When you need more complex or lengthy communications (such as when you are explaining the effect of work upon disability benefits), generally, you'll need to provide a sign language interpreter. It's important to understand what you are required to do in order to comply with the Americans with Disabilities Act (ADA) when serving beneficiaries with disabilities. Under the ADA, you must provide effective communication when providing public services. The ADA doesn't specifically state that you must offer an interpreter as the method of providing effective communication; however, it's important to assess when an interpreter is the appropriate choice for accommodation. WIPA projects need to know where to access sign language interpreter services and need to budget sufficient funds to pay for this necessary expense. You can find information on how to locate interpreter services at https://myaccount.rid.org/Public/Search/Interpreter.aspx.

Some people who are deaf or hard of hearing or who have speech disabilities use a TTY instead of a standard telephone. This device has a keyboard for entering messages and a visual display to view the content of a conversation from another person using a TTY. To make it easy for people who use a TTY to communicate with businesses and individuals who don't have a TTY, the ADA established a free state-by-state relay network nationwide that handles voice-to-TTY and TTY-to-voice calls. Beneficiaries who use a TTY to make telephone calls may telephone your business using a relay network. The relay consists of an operator with a TTY who translates TTY and voice messages. For example, a caller using a TTY calls the relay operator who then calls your business. The caller types the message into the TTY and the operator reads the message to you. The person being called responds by talking to the operator, who then enters your message into the TTY.

Many individuals who use American Sign Language (ASL) use Video Relay Service (VRS) to communicate with voice telephone users through video equipment, rather than through typed text. Video relay calls are made using a high-speed or broadband Internet connection (i.e., DSL, cable, or T1 line) and a videophone connected to a TV, or through a personal computer equipped with a Web camera and video relay software. The person who is deaf signs to a video interpreter, who then communicates with a hearing person via a standard phone line by relaying the conversation between the two parties. For information, visit Video Relay Services FCC Consumer Facts found at http://www.fcc.gov/cgb/consumerfacts/videorelay.html.

When working with beneficiaries who don't speak English, WIPA projects have several options. First, Social Security encourages WIPA projects to hire multilingual CWICs when needed. This may be particularly useful for areas with high concentrations of people who speak a certain language — in particular, Spanish. Another option is to locate and contract with local English interpreter services. WIPA projects should investigate the providers of such services in their local area and be prepared to contract for services as needed. Finally, there are several national companies that provide telephone interpreting services for a wide variety of languages. These services charge fees for their services at varying rates. One service WIPA projects have used successfully is the Language Line. More information can be found at http://www.languageline.com/.

Written Information

Finally, providing written information is a common part of WIPA services, because it's important for beneficiaries to have something to refer back to when questions arise. WIPA personnel need to remember that not all beneficiaries will be able to use standard written information due to visual impairments, or when English is their second language. In these cases, it's necessary to provide the written materials in alternate formats, which may include translations into another language, providing materials in large type or in electronic formats, or even converting materials into Braille format. Most Social Security publications are already available in Spanish and in audio format, and in some cases, these materials are in Braille format. Social Security publications are available online at http://www.ssa.gov/pubs/.

Materials written by CWICs may need to be converted to another language before CWICs share them with the beneficiary. A good practice is to ask all beneficiaries how they prefer to receive written materials. The costs associated with providing alternate formats to beneficiaries is a cost of providing WIPA services and are to be borne by the WIPA project.

It isn't permissible to charge beneficiaries fees for any portion of WIPA services.

Supporting Beneficiaries to Successfully Participate in WIPA Services

CWICs work with a wide range of beneficiaries when they provide WIPA services, and some individuals will need more support than others to fully benefit from this service. The information you provide to beneficiaries about the effect of paid employment on Social Security benefits and other income support programs can be terribly complex and confusing. The nature of the individual's disability can further complicate this fact, particularly when an intellectual or emotional impairment exists.

Individuals with intellectual impairments may require significant support to understand the effect that work will have upon benefits. Many beneficiaries with intellectual impairments will have Social Security-appointed representative payees who help them manage their Social Security benefits, or even may have legal guardians appointed by a court of law. In other cases, these beneficiaries will have significant involvement with disability services organizations and may have a designated case manager or services coordinator who assists with financial issues. You'll need to coordinate your planning and counseling services with these support providers to make sure that a responsible party is serving the beneficiary's interests and noting the critical information. There will be times when a beneficiary with an intellectual impairment has no support to rely upon when it comes to financial matters. Accommodate this by keeping your explanations short and focused on the most critical points. You may need to repeat the most essential points over numerous meetings or conversations. If you feel that the beneficiary is at risk due to lack of support with financial matters, then you may need to provide counseling about arranging for a representative payee.

Additionally, individuals with psychiatric impairments may require special accommodation in order to benefit from WIPA services. In some cases, beneficiaries with mental illness may experience periods of time when the symptoms of their illness increase. This may cause problems with keeping appointments or make it more difficult for you to communicate clearly with the individual. In other cases, the mental illness may cause the beneficiary to become distraught or upset over minor benefit issues, or to be unable to focus on the work incentives advice you are offering. The best course of action in these cases is to be patient and to slow down the pace of the planning and counseling services you provide. There may even be times when you should advise the beneficiary to contact a mental health professional for assistance.

When in doubt, the best strategy for dealing with any individual difference caused by disabilities is to ask the beneficiary what accommodations he or she feels will be necessary or prefers. You might be surprised at how readily beneficiaries respond to such questions and how much they know about accommodating their own disability. In some cases, individuals with disabilities will have significant involvement with agencies that provide disability services and supports. Working in partnership with these agencies is critical for success over time. Disability professionals are also an excellent source of information about how to accommodate and support people with various disabling conditions. WIPA projects may want to seek training from agencies in order to work more effectively with individuals who have specific disabilities.

Conclusion

Providing WIPA services that fully accommodate disabilities and respect cultural differences is a core requirement of WIPA projects imposed by both federal law as well as the Cooperative Agreements WIPA projects hold with the Social Security Administration. WIPA Project Managers must actively make sure that WIPA services are fully accessible to ALL Social Security disability beneficiaries. Promoting employment and enhancing financial stability for Social Security disability programs beneficiaries is a goal for ALL eligible beneficiaries, not just those who are easiest to connect with and serve. WIPA services must be fully inclusive in order for this goal to be realized for the entire spectrum of individuals receiving disability benefits from Social Security.

Competency Unit 5 – Professional Ethics for CWICs

Ethics as a Quality Issue

Professional ethics are at the core of all human service professions. As in all counseling fields, work incentives planning and assistance involves helping vulnerable people with critical and sensitive life issues. CWICs face numerous situations in their daily work requiring a high degree of discretion, judgment, maturity, and the ability to balance competing interests. It isn't enough for CWICs to understand how paid employment affects the various benefits. CWICs must also uphold stringent ethical standards in performing their job duties by applying the information contained in this manual in a morally responsible and ethical manner.

The ethical guidelines presented in this unit represent a set of standards of conduct that WIPA personnel must consider in their daily work and when difficult ethical dilemmas challenge them. The purpose of this code of ethics is to:

- Define acceptable behavior for CWICs and their managers;
- Promote high standards of practice;
- Establish a framework for professional CWIC behavior and responsibilities; and
- Provide a benchmark for WIPA personnel to use for self-evaluation.

Simply developing a written code of ethics doesn't guarantee ethical behavior. Moreover, a code of ethics won't resolve all ethical disputes or capture the complexity involved in striving to make responsible choices. Rather, a code of ethics sets forth broad values, principles, and standards to which WIPA personnel aspire to practice and by which actions can be judged. Ethical behavior can only result from the personal commitment of CWICs to engage in ethical practice and rigorous oversight by project management.

A Code of Ethics for CWICs

There are five main ethical principles that form a unique code of ethics for WIPA services to which personnel must adhere.

Principle 1: Treating Beneficiaries with Dignity and Respect

CWICs are required to treat each beneficiary in a caring and courteous manner. This includes the following practices:

- **Accommodating Individual Differences:** You must view each person you serve as an individual and not merely as a member of a disability group. Beneficiaries have unique interests and goals and require benefits counseling based on those personal preferences. WIPA services must not be delivered in a "one size fits all" manner. Ethical standards of practice are best met when CWICs take a customized approach to work incentives planning and assistance and provide accurate and complete information to allow beneficiaries to take the "next step" toward their employment goal.
- **Supporting Beneficiary Empowerment and Choice:** Sound WIPA practices provide beneficiaries with the information necessary to make fully informed choices about employment. CWICs should also explain why one course of action might be preferable to another by comparing the costs and benefits of various options. It's important to remember, however, that the ultimate decision about the beneficiary's path or action to be taken must be made by the beneficiary. CWICs acting in an ethical manner encourage beneficiaries to make choices about work that are in the best interests of the individual; they don't impose their own opinions on others.
- **Maintaining a Non-Judgmental Approach:** While CWICs may offer advice based upon their benefits expertise, it's inappropriate to express judgments about a beneficiary's choices. CWICs must understand that the WIPA program doesn't judge individuals who decide not to pursue employment or who opt to work at levels below their capability. Furthermore, the WIPA program doesn't place a higher value on individuals who earn more, work at higher levels, or work for longer periods. The role of the CWIC is strictly a

positive one — to encourage, promote, assist, and support forward movement along the employment continuum.

- **Protecting Beneficiary Privacy and Confidentiality:** In order to provide effective services, CWICs often must gather a wide range of financial and personal data about the beneficiary. In some cases, this also includes information about the individual's disability found in medical records. CWICs must keep all WIPA records strictly confidential and you may not disclose them to any external party, intentionally or unintentionally, without express written permission from the beneficiary. Furthermore, CWICs shouldn't discuss confidential information in any public setting unless privacy can be assured. This includes areas such as hallways, waiting rooms, elevators, and restaurants. CWICs must also take precautions to ensure and maintain the confidentiality of information transmitted to other parties using computers, electronic mail, facsimile machines, telephones and telephone answering machines, and other electronic or computer technology. Any records maintained, whether in electronic or paper format, must be held strictly confidential with access only afforded to authorized WIPA personnel. This means that file cabinets holding paper records must be locked at all times with only authorized persons allowed access. For electronic records, security measures must be in place to prohibit anyone other than authorized individuals from obtaining beneficiary information.

IMPORTANT: The 2017 WIPA Cooperative Agreement requires that WIPA grantees protect Personally Identifiable Information (PII) of all beneficiaries served and carefully guard the confidentiality of beneficiary information at all times. WIPA projects are instructed to work with Social Security to establish, implement, and monitor rigorous protocols for security.

Principle 2: Maintaining Professional Competency

CWICs are exposed to critical information relating to an individual's health conditions, personal finances, and health care coverage that can have a profound impact on a beneficiary's economic and physical well-being. Even a small benefits counseling error can have a disastrous effect on an individual's ability to pay for food, housing, utilities, or essential medical services. It's crucial that CWICs recognize the power they wield through the information and advice they offer. In order to provide sound advice and avoid harming a beneficiary, CWICs must attain and maintain a high level of professional knowledge and skill.

Professional competence also includes the wisdom to recognize the limitations of one's knowledge. In order to identify areas in which external consultation, referral, or additional training may be necessary, CWICs must conduct a thorough and honest self-assessment of their skills and competencies. Taking personal responsibility for developing professional skills isn't optional — it's a requirement to stay current and apprised of the latest regulations, payment amounts, and provisions. CWICs have a professional responsibility to know in which competency areas they require support, and must initiate assistance in those areas.

> **IMPORTANT:** Social Security now requires CWICs to maintain continuing education requirements. Certified CWICs must accrue a minimum of 18 hours annually of continuous education training to enhance their skills and retain certification.

CWICs have many options for obtaining new knowledge and developing skills. The WIPA National Training & Data Center (NTDC) at VCU provides self-paced archived training events, Internet-based classes, and short teleconference trainings on an ongoing basis. Many local and national entities involved with Social Security issues also may hold training events or periodic meetings that contain informational and training components. Seek out these resources and use them. A CWIC's work plan MUST build in time for continuing education efforts — this isn't something optional that only applies when there is "down time." Continuing education is required.

Finally, professional competence includes diligence in providing professional services in a courteous, prompt, well planned, and thorough manner. Every transaction with a beneficiary is a reflection of the CWIC's professional competence. While the demand for WIPA services is high, CWICs still need to return phone calls and respond to email inquiries in a reasonable amount of time. They must treat beneficiaries with respect and work to gain their trust. The information they provide to beneficiaries must be correct, complete, and individualized to meet the beneficiary's unique set of circumstances.

Principle 3: Serving Beneficiary Interests While Promoting Employment and Enhancing Financial Stability

CWICs must focus on serving the best interests of beneficiaries, but must balance this focus with the primary objective of the WIPA program — promoting employment and enhancing financial stability. In most cases, these two goals work in tandem, but on occasion, they can stand in conflict with one another.

It's important for CWICs to balance the WIPA emphasis on paid employment with a healthy dose of common sense. There will occasionally be times when working at a certain level or working to the point of benefit termination wouldn't be in the best interests of the beneficiary. For example, an individual who relies on a Medicaid waiver program to pay for attendant care services would typically not be able to replace this benefit if it were lost due to excess resources or income. Advising a beneficiary to engage in employment that would jeopardize an irreplaceable and possibly life-sustaining benefit would be unethical. Similarly, neglecting to warn a beneficiary when an employment or earnings goal would cause financial harm is also unethical. CWICs have a responsibility to help beneficiaries improve financial well-being through work, while retaining critical services.

While it may not be in the best interests of some individuals to terminate from benefits due to work, this is certainly NOT the case for all beneficiaries, or even most beneficiaries. Terminating from benefits isn't a universally "bad" thing and isn't harmful in the majority of cases. CWICs must be careful that they aren't presenting this outcome in a negative fashion when counseling beneficiaries. In fact, individuals with the capacity to generate earnings sufficient to cause benefits to terminate may be better off financially by doing so — as long as beneficiaries consider all costs of employment and they continue to meet their healthcare needs. The goal is to work with each beneficiary individually to set employment goals that result in the highest earnings potential possible within the framework of those goals. Counseling techniques or messages that discourage beneficiaries from working or frighten them into retaining attachment to public benefits is contrary to everything the WIPA program is trying to achieve.

Finally, WIPA personnel must remain clear about who the primary beneficiary is. The CWIC's job is to advocate for what the adult beneficiary desires, not what the parent, representative payee, job coach, residential services provider, vocational rehabilitation counselor, or Social Security claims representative thinks is best. There will be times when it's very difficult to balance the competing desires of all involved parties. The best plan is to always stay focused on the primary recipient of your services as well as the primary objective of the WIPA program — promoting employment and increasing financial stability!

Principle 4: Avoiding Conflicts of Interest

A potential conflict of interest arises any time the CWIC, or his or her employer, has a real or apparent interest that may be at odds with the interests of the beneficiary. This may occur when an agency responsible for determining the beneficiary's right to a particular benefit employs the CWIC. Another possible conflict might arise when a CWIC has a business relationship with the person at Social Security or another agency responsible for deciding issues related to the beneficiary's case.

Another potential conflict of interest would exist when the CWIC, or his or her employing company, is in a position to profit from the beneficiary's work activity and benefit status. This would be the case whenever WIPA services are provided by an approved EN under Social Security's Ticket to Work program. Social Security provides some very specific direction for avoiding or eliminating conflicts of interest in these cases in the 2016 Terms and Conditions document.

WIPA grantees shall submit for approval a written protocol to prevent or eliminate conflicts of interest for a grantee that houses or administers either a WIPA project and an Employment Network (EN), or a WIPA project and a (PABSS) project. These instructions are shown below:

a. Within 30 days of award, organizations that house both a WIPA and an EN must provide a written protocol containing at minimum all of the following elements:

- Description of the separation of all administrative, budgeting, and direct service duties of the WIPA cooperative agreement and the EN contract staff and services, including assurances that the same individuals don't serve as employees of both the WIPA and the EN.
- Detailed explanation of how issues will be resolved when a beneficiary, EN, or other service provider lodges a complaint against a CWIC or against the WIPA.
- Assurances that WIPA staff will provide beneficiaries comparable information on all available public and private service providers, including the full complement of ENs in their community.
- Assurances that beneficiaries won't be automatically referred or unduly influenced to assign their tickets to the grantee's EN.
- Assurances that beneficiaries receiving services from the WIPA will receive advice about all available work incentive programs, even if those programs may delay payments of milestone or outcome payments under the Ticket to Work program for the EN housed within their organization.

Unlike prior iterations of the WIPA program, we won't consider any exceptions to the firewall requirement between a WIPA and an EN. The WIPA must qualify as an autonomous program independent of the sponsoring or parent agency.

Note: If, at any time during this award, an entity housing a WIPA elects to enter into an agreement with Social Security so that the recipient organization becomes an EN the WIPA project must submit the statements described above within 30 days of notice of the EN award, and must update them annually, as needed.

b. Within 30 days of this award, Protection and Advocacy (P&A) organizations housing WIPA programs must submit a protocol containing at minimum the following elements:

- A description of the separation of PABSS client files and WIPA beneficiary files; direct service staff; intake procedures; case management procedures; and complaint processes. Direct service staff includes individuals with one-to-one, ongoing contact with beneficiaries and supervisors with access to case files.

- Projects may exclude in the above description Executive and Administrative staff that don't have direct contact with beneficiaries and don't access WIPA or PABSS case files.
- If projects wish to use staff with direct service responsibilities or staff with access to beneficiary information on both WIPA and PABSS awards, the project shall submit a written request for formal approval to their Project Officer for an exception regarding the separation of direct service personnel. The request should describe why this individual's service on both awards is necessary and how the P&A organization will ensure that there are no actual or perceived conflicts of interest.

The best approach is to avoid any real or perceived conflicts when providing WIPA services. In cases where this exists, the CWIC should disclose the potential problem and continue to work with the beneficiary only if he or she agrees despite the conflict. The CWIC should confirm in writing the disclosure and subsequent approval to continue services, to avoid future misunderstandings, and to ensure that both parties are committed to working together.

Principle 5: Maintaining Personal Integrity

Beneficiaries and their family members often place CWICs in a position of tremendous trust and confidence. The ultimate source of such trust is the CWIC's personal integrity. In deciding the proper course of action in any counseling situation, a CWIC must always rely on his or her own internal moral compass or conscience.

While CWICs are obligated to zealously pursue the interests of beneficiaries, they must meet this goal within the bounds of what is otherwise legal and ethical. CWICs aren't expected to pursue the beneficiary's interests if Social Security's (or another government entity's) laws, regulations, and policies clearly preclude them. Whenever it appears that what the beneficiary wants and what you know is proper are in conflict, you are obligated to make it clear that you aren't willing to pursue the desired course of action. While CWICs are ethically obligated to inform the beneficiary of actions that are potentially illegal or improper as well as the consequences of pursuing such courses, they may not ethically report confidential information to Social Security or any other agency. If a beneficiary insists on pursuing an improper course of action, it's best for the CWIC to inform the beneficiary that WIPA services will be discontinued. Social Security clearly describes the CWIC's role in upholding ethical standards in the 2017 Terms and Conditions document:

> *"WIPA project staff shall maintain the highest ethical standards in their dealings with Social Security's beneficiaries. This includes, but is not limited to, the right to decline to serve beneficiaries unwilling to report wages, other income, or any changes in beneficiary circumstances that affect the beneficiary's eligibility or benefit amount."*

CWICs may avoid many ethical dilemmas by planning for such issues in advance and entering into written agreements with beneficiaries at the outset of the counseling relationship. This agreement should spell out the beneficiary's rights under the CWIC's code of ethics as well as responsibilities for complying with all applicable Social Security laws, regulations, and policies. Outlining who is responsible for what actions and what your limitations are will also clearly define your relationship with the beneficiary. When a beneficiary knows what he or she can expect from the CWIC and what the CWIC requires of the beneficiary, they can avoid many ethical dilemmas.

Conclusion

The CWIC code of ethics presented in this unit offers a set of values, principles, and standards to guide decision-making and conduct when ethical issues arise. It doesn't provide a precise set of rules that prescribe how CWICs and their managers should act in all situations. Specific applications of the code must take into account the context in which it is being considered and the possibility of conflicts among the code's values, principles, and standards. Furthermore, the code doesn't prioritize values, principles, and standards in instances when they conflict and reasonable differences of opinion can and do exist among WIPA personnel. Therefore, CWICs must use informed judgment in making ethical decisions and consider discernment in a peer review process, applying professional ethical standards.

Ethical decision-making is a process, not an end in itself. There are many instances where simple answers aren't available to resolve complex ethical issues. CWICs must continually evaluate the extent to which their work is characterized by ethical principles, and managers must assess staff performance with these principles in mind.

Conducting Independent Research

The Ethics Resource Center: http://www.ethics.org/

National Association of Social Workers Code of Ethics: https://www.socialworkers.org/About/Ethics/Code-of-Ethics/Code-of-Ethics-English
Creating a Code of Ethics for your organization:
http://www.ethicsweb.ca/codes/

The International Business Ethics Institute:
http://www.business-ethics.org/

National Organization for Human Services – Ethics for Human Services Workers: http://www.nationalhumanservices.org/ethical-standards

Federal Contractor Code of Business Ethics and Conduct:
https://acquisition.gov/far/current/html/Subpart%203_10.html