

Module 7 – WIPA Standards and Quality Considerations for CWICs

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Module 7 – WIPA Standards 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 being harmed by receiving inaccurate or misleading information.

This module focuses on planning and implementing quality improvement activities that enable CWICs and WIPA programs 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 programs. Unit 2 describes strategies for providing WIPA services with a focus on quality. Unit 3 offers specific information about providing WIPA services that accommodate disabilities, and respect cultural differences. Unit 4 describes a set of ethical standards that CWICs must follow in the performance of their duties.

CWIC Core Competencies

- Demonstrates an understanding of the minimum compliance requirements for WIPA programs as stated in the WIPA Cooperative Agreement.
- 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.
- Provides culturally sensitive and competent work incentives 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 program 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.
- Maintains the highest ethical standards in all 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.

Competency Unit 1 – WIPA Quality Assurance Baseline

Introduction

WIPA programs operate under a written cooperative agreement with Social Security that outlines Social Security’s requirements in the Terms and Conditions of the award. These requirements represent the minimum standards for WIPA services. The cooperative agreement documents outline minimum requirements for the three topics we will discuss in this section:

- Staff training and certification;
- WIPA service delivery; and
- Beneficiary confidentiality and privacy.

These requirements relate specifically to CWICs and the daily work they perform in providing WIPA services.

Staff Training and Certification

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 acquire and maintain a high level of knowledge and skill and apply this knowledge and skill accurately and effectively. The WIPA Terms and Conditions state:

“WIPA grantees must send staff designated to be CWICs to the official SSA approved initial CWIC training. Staff must register for initial training within 30 calendar days of hire or assignment to the WIPA cooperative agreement, or for the next available initial training class (if later). Within the first 30 calendar days, the Project Director must notify the SSA Project Officer and receive approval if there is a delay. Staff must attend initial training and successfully complete provisional certification in order to serve beneficiaries.

Subsequent to provisional certifications, staff must complete and retain full certification in order to continue to work on the 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 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 prior to achieving full certification. The WIPA National Training and Data Center (NTDC) at Virginia Commonwealth University (VCU) offers this web course.

Completing the 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. Training should focus on eligibility requirements and the effect that employment has on these programs. WIPA Project Directors must encourage WIPA staff to attend state and local training opportunities as part of their duties and must provide resource materials for CWICs to research state and local benefit situations and employment supports within the WIPA project 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, Workers' 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 programs 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 current Terms and Conditions document states that:

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

This requirement applies to all fully certified WIPA CWICs and Program Directors 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 Program Director submits a request for approval using the CCC

template to the Social Security Project Officer after staff attends the conference.

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. Certified CWICs and Program Directors must earn three additional supplemental training credits in years in which they are not required to submit a BS&A.

WIPA Program Directors who serve as CWICs must meet the CWIC certification requirements described above. Program Directors who don't provide direct services to beneficiaries are not required to meet the three (3) credit BS&A requirement, but must submit written documentation 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 current Terms and Conditions document describe how Social Security expects CWICs to deliver WIPA services to beneficiaries. First, Social Security requires WIPA Programs 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. Such services include free, timely, equitable, accessible, accurate, and comprehensive WIPA services. (Note: WIPA staff may not represent beneficiaries in appeals. Instead, WIPA project 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 programs must:

“Provide comprehensive, proactive guidance to beneficiaries to:

- 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, the Ticket to Work (Ticket) program, Impairment Related Work Expenses (IRWE), and health insurance protections.
- Identify opportunities to use Plans to Achieve Self-Support (PASS) and assist beneficiaries to complete and submit PASS whenever requested;
- Understand opportunities to access the 1619(b) Medicaid continuation work incentive, including assisting beneficiaries to request individualized thresholds;
- Understand state Medicaid programs within their service areas, especially those that affect beneficiaries with disabilities, such as Medicaid Waivers, and Medicaid Buy-In programs.

- Encourage retention of appropriate documentation in order to report wages and ensure access to work incentives;
- Encourage and support accurate and timely earned income reporting to reduce the size or likelihood of overpayments; and
- Connect beneficiaries to supports and services they need to improve their quality of life and 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:

- Beginning with July 1, 2022, Social Security allows outreach only with permission from the project’s Social Security-assigned Project Officer;
- When given permission to conduct outreach, programs should target outreach to underserved racial, ethnic, and disability communities. In addition, programs should target outreach to veterans and transition age youth; 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.

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.

Other WIPA Service Requirements

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

- WIPA programs are required to provide WIPA services that accommodate disability and respect cultural differences. This topic is covered fully in Unit 3 of this module.
- WIPA program staff shall maintain the highest ethical standards in their dealings with Social Security's beneficiaries. This includes avoiding all potential conflicts of interest. This manual discusses ethical standards for CWICs at length in Unit 4 of this module.

Compliance with Social Security's Policy on Confidentiality and Privacy

WIPA programs must collect and report beneficiary data as required by Social Security. This data is for evaluation, program performance, and statistical purposes only. CWICs must keep all beneficiary information strictly confidential at all times. Social Security requires CWICs to abide by the following policies:

- WIPA programs may not maintain beneficiary Personally Identifiable Information (PII) in any data collection system

other than systems Social Security specifies. It's important to understand what Social Security means by the terms "Personally Identifiable Information (PII)", and "data system". PII is a beneficiary's name, address, phone number, Social Security Number (SSN), or any information, or combination of pieces of information that could identify a person. Protecting PII has always been a Social Security priority, but it is especially critical in today's electronic environment. Similarly, it is important to understand that storing information in a data system or any electronic media that may be vulnerable to hacking is just as risky as leaving a file open where people can see it. Social Security does not permit WIPA programs to use online data systems that the agency did not approve simply because they may be vulnerable to attack. Social Security requires WIPA programs to be very careful to store any electronic information only on the encrypted storage devices Social Security provides, in hard-copy in locked file cabinets, or, in any approved, secure systems Social Security provides for WIPA use. Social Security also requires the following:

- CWICs may not send PII via email unless it is in a password-protected, encrypted attachment;
- WIPA staff must not include the password in the same email with the attachment. Instead, send it in a separate email, or call the beneficiary with the password;
- WIPA staff should never send PII in the body of an email. Make sure beneficiary data contained in paper files is only available to program personnel;
- WIPA staff must keep files and encrypted storage devices in locked file cabinets when not in use;
- WIPA programs 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 programs 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 programs may only release information that they generate such as BS&A reports, intake interviews, or case notes. The exception is when a release specifies the entity responsible for the data. WIPA programs 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; and
- 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 Employment Support (OES) Project Officer.

Conclusion

WIPA programs operate under a cooperative agreement with Social Security. As the primary funding and administering agency, Social Security is responsible for outlining 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 (11-2016)

Effective (11-2016): [socialsecurity.gov](https://www.socialsecurity.gov)

(<https://www.socialsecurity.gov/forms/ssa-3288.pdf>)

Competency Unit 2 – 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 as free as humanly possible from mistakes, deficiencies, and significant variations in work incentives counseling. CWICs deliver high-quality WIPA services by strict and consistent commitment to standards. Quite simply, it’s doing the right things, in the right way, to the best of your ability.

Providing excellent WIPA services is something CWICs should strive for every day during each interaction with beneficiaries and other stakeholders. This unit will help you understand the competencies you need to provide quality services.

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, as much as humanly possible. 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 they expect all CWICs 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 in this manual.

Building the Quality of your Work

CWICs can build 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, as much as humanly possible. Excellence and accuracy 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 build the quality of your work, you have to recognize you need to improve. It takes maturity and honesty to go through this type of evaluation. CWICs have several avenues for getting constructive feedback, which include WIPA Program Directors, co-workers with advanced experience and skills,

and VCU NTDC Technical Assistance Liaisons. CWICs who want to improve must actively seek out feedback 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 OES. 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 throughout this manual. If you invest your time and energy in building competency, you will meet Social Security's expectations for quality.

Competency Unit 3 – Providing WIPA Services that Accommodate Disability and Respect Cultural Differences

Introduction

Social Security requires WIPA programs 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 current WIPA Terms and Conditions document states the following:

“WIPA grantees must have accessible facilities, materials, meeting places, and communication. This includes 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;
- A fully accessible web presence that meets or exceeds 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 programs to find ways to attract and accommodate ALL beneficiaries who are eligible for WIPA services. This unit examines the many responsibilities WIPA programs have in this regard and provides clear strategies for meeting 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 a wide beneficiary base in an inclusive manner without formal training.

Given that the subject matter is far too broad to be covered in the initial CWIC training, WIPA programs will need to find training in these areas from sources outside of the VCU NTDC. There are many affordable sources for this training, including classroom-based training and Internet-based courses. WIPA Program Directors are encouraged to research available options and to arrange for all staff to receive this training.

Performing Outreach Activities that Accommodate Disability and Respect Differences in Culture and Language

If WIPA programs 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 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. 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 leaders within isolated communities to help spread the word about the value of WIPA services. These leaders 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. If outreach activities reflect an understanding and accommodation of cultural traditions, beneficiaries within that culture will be more likely to participate.
- When WIPA programs organize outreach events to target a specific disability or ethnic group, it's important to be prepared to communicate with attendees. This means that enough 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 program should make an effort to hire bilingual staff.
- WIPA programs 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. Program

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 program 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 [dms.myflorida.com](https://www.dms.myflorida.com/content/download/129860/806892/Disability_Etiquette_Tips_for_Speaking_Engagements.pdf) (https://www.dms.myflorida.com/content/download/129860/806892/Disability_Etiquette_Tips_for_Speaking_Engagements.pdf):

- 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 programs need to be prepared to receive constructive criticism and make every reasonable effort to implement the suggestions offered.

Ensuring 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 Program Directors 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 Statewide Independent Living Council (SILC). 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 adata.org (<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 required communications. 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 programs 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 **[the Registry of Interpreters for the Deaf website](https://myaccount.rid.org/Public/Search/Interpreter.aspx)** (<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 the **Federal Communications Commission web page** (<https://www.fcc.gov/consumers/guides/video-relay-services>).

When working with beneficiaries who don't speak English, WIPA programs have several options. First, Social Security encourages WIPA programs 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 programs 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 programs have used successfully is the Language Line. More information is available at **languageline.com** (<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. Most Social Security publications are already available in Spanish and in audio format, and in some cases, these materials are in Braille. Social Security publications are available online at **ssa.gov** (<http://www.ssa.gov/pubs/>).

CWICs may need to convert written materials to another language before sharing them with the beneficiary. A good practice is to ask all beneficiaries how they prefer to receive written materials. Covering the costs of providing alternate formats to beneficiaries is the WIPA program's responsibility, and is essential to providing WIPA services.

WIPA programs may not 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 Director 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 programs 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 programs imposed by both federal law as well as the Cooperative Agreements WIPA programs hold with the Social Security Administration. WIPA Program Directors 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 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 to meet this goal for the entire spectrum of individuals receiving disability benefits from Social Security.

Competency Unit 4 – 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 Directors;
- 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. WIPA staff should strive to meet those standards, and WIPA management should create policies and provide oversight that supports those standards.

A Code of Ethics for CWICs

These five ethical principles form a unique code of ethics for WIPA services.

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. CWICs must not deliver WIPA services in a “one size fits all” manner. CWICs should 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 belongs to the beneficiary. CWICs should encourage beneficiaries to make choices about work that are in the best interests of the individual; CWICs should not impose their own opinions.

❖ 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 should not 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 be careful to ensure the confidentiality of information sent to other parties using computers, electronic mail, facsimile machines, telephones and telephone answering machines, and other electronic or computer technology. Any records, whether in electronic or paper format, must be held strictly confidential available only 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 current 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 programs 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 informed of the latest regulations, payment amounts, and provisions. CWICs have a professional responsibility to know in which competency areas they require support, and must request assistance in those areas.

IMPORTANT: Social Security requires CWICs to meet Continuing Certification Credit (CCC) requirements. Certified CWICs must accrue a minimum of 18 CCC to enhance their skills and retain certification each year.

CWICs have many options for learning 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 **MUST** build in time for continuing education efforts — this isn't something optional that only applies when there is "down time."

Finally, CWICs must provide 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. It would also be unethical to discourage a beneficiary from working if an alternative existed that might meet the beneficiary's needs, like a Medicaid buy-in. Failing to explore alternatives, or neglecting to warn a beneficiary when an employment or earnings goal would cause financial harm are 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 is 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 (the beneficiary) as well as the primary objective of the WIPA program — providing accurate information to promote employment and increase 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.

Similarly, since Protection and Advocacy for Beneficiaries of Social Security (PABSS) programs may provide advocacy in situations when WIPA services do not meet requirements, Protection and Advocacy organizations housing WIPA programs must also submit a plan to avoid conflicts of interest. Social Security provides very specific direction for avoiding or eliminating conflicts of interest in these cases in the current Terms and Conditions document:

"WIPA grantees shall submit a written protocol outlining how to prevent or eliminate conflicts of interest for a grantee that houses or administers either a WIPA program and an EN, or both a WIPA program and a (PABSS) program.

a. Within 30 days of award, organizations that house both a WIPA and an EN must review and provide any updates to their previously approved 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 agreement staff and services, including assurances that the same individuals do not 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 will not 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 will not 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 program 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 review and submit any

updates to previously approved protocols 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. If programs wish to add staff with direct service responsibilities or staff with access to beneficiary information on both WIPA and PABSS awards, the program shall submit a written request for formal approval to their Program 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 must pursue beneficiaries' interests, 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 cannot pursue an unethical course of action. While CWICs are 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 discontinue. Social Security clearly describes the CWIC's role in upholding ethical standards in the current Terms and Conditions document:

“WIPA program 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 Directors 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 seeking peer feedback to ensure they apply 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 Directors 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>)
- **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>)
- **Contractor Code of Business Ethics and Conduct**
(<https://www.acquisition.gov/far/52.203-13>)