

Module 5

Insuring the Provision of High Quality WIPA Services

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Module 5

Insuring the Provision of High Quality WIPA Services

INTRODUCTION

A clear and essential focus of the Social Security Administration (SSA) in the development of the WIPA program is quality assurance. Without the implementation of rigorous internal oversight procedures, there would be a risk to beneficiaries of not receiving accurate information about complex issues and the exemplary services they deserve. Therefore it is imperative that Community Work Incentive Coordinators (CWICs) have the resources to provide high caliber planning, counseling, and support services on sensitive topics related to finances and healthcare coverage to the beneficiaries that they serve. This focus requires that WIPA programs have strategies in place to ensure:

- ▶ CWICs are well trained in Social Security Benefits and work incentives, and have ample opportunity to maintain and expand that knowledge through continuing education programs;
- ▶ CWICs have received comprehensive training in other federal transfer programs and state-specific programs;
- ▶ CWICs use sound judgment and demonstrate ethical behavior at all times;
- ▶ A commitment from management to use the data collection system provided by SSA and to use data analyses to inform project outcomes;
- ▶ A commitment to case management, monitoring and on-going support of beneficiaries as they make informed decisions about employment; and
- ▶ A quality assurance program to track staff performance and provide beneficiaries with reports and information that are accurate and timely.

Content in this module will concentrate on determining quality indicators and standards for all WIPA services including developing and implementing procedures to ensure that all information provided to beneficiaries is accurate, complete, and verified and feedback from beneficiaries and partner agencies indicates a satisfactory conclusion; all beneficiaries are served regardless of age, primary disability, primary language, or geographic location; participant demographic and service data are collected and maintained; and areas for improvement are identified and procedures put in place to generate changes when necessary to increase service quality.

Unit 1 describes the first step in quality assurance – compliance with basic requirements incorporating minimum standards that SSA requires of WIPA agencies.

Unit 2 emphasizes professional ethics describing quality assurance from the individual CWIC's perspective.

Unit 3 describes strategies for developing a functional quality assurance plan with measurable outcomes and specific action steps designed to achieve them.

Unit 4 describes strategies for assessing service quality then discusses how to incorporate continuous quality improvements into the program to push WIPA projects beyond minimum standards toward implementation of best practices.

CWIC CORE COMPETENCIES ADDRESSED

The following core competencies are required of CWICs:

1. Deliver WIPA services using the “Employment Progression” approach characterized by “just-in-time” provision of work incentives counseling customized to meet the unique needs of beneficiaries at the contemplative, preparatory, job search, and employment stages of the employment continuum.
2. Identify eligible beneficiaries and conduct initial intake interviews, develop written benefits summary and analysis reports, and written work incentives plans (WIP).
3. Facilitate the use of necessary and appropriate work incentives (e.g., IRWE, BWE, SEIE, Subsidies, PASS, EXR,) at each stage of the employment process to support the achievement of employment goals and objectives.
4. Provide proactive, ongoing WIPA services as a collaborative member of each beneficiary’s employment support team, which facilitates achievement of paid employment, supports employment retention over time, and fosters future career advancement.
5. Demonstrate knowledge of effective strategies for interacting with SSA field office personnel and Area Work Incentives Coordinators in WIPA service delivery.
6. Adhere to the highest standard of ethical and professional behavior and conduct in the provision of planning and counseling services.
7. Provide services that demonstrate effective accommodations for persons with disabilities, as well as services that demonstrate linguistic and cultural sensitivity and competence.



Competency Unit 1

WIPA Quality Assurance Baseline: Compliance with Minimum Requirements

INTRODUCTION

In its broadest sense, quality is defined by customer requisites and expectations from items or services purchased. The purchaser has certain minimum standards and specifications in mind and if these requirements are not met, the person will take his/her business elsewhere. To begin a discussion about quality as it relates to WIPA services, we must first determine SSA's expectations for WIPA projects. In this sense, SSA is a customer purchasing services from vendors – the entities paid by SSA to provide WIPA services. The customer (SSA) seeks certain features, characteristics, results or outcomes from its vendors (WIPA Projects) and uses these specifications to assess quality and overall satisfaction.

Social Security initially identified the minimum WIPA compliance standards in the Request for Proposal that outlined the WIPA program on May 16, 2006 (Federal Register/Vol.71/No.94/Tuesday May 16, 2006/Notices). These requirements are the starting point for quality assurance and the minimum standards that SSA expects from WIPA. In addition, each WIPA project operates under a written cooperative agreement with SSA, which further articulates the expectations the agency has for its contractors. Compliance standards in these documents cover the following areas:

1. Staff training and credentialing requirements
2. Beneficiary data collection requirements and use of management information data to improve processes
3. Maintaining beneficiary confidentiality and privacy
4. Addressing potential conflicts of interest
5. Development of a quality assurance plan

STAFF TRAINING AND CREDENTIALING REQUIREMENTS

SSA requires that all WIPA personnel providing benefits counseling to beneficiaries complete the initial CWIC training and certification process, which provides 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.

In addition to the initial training, SSA expects CWICs to access information about all state specific programs such as Medicaid, Worker's Compensa-

tion, unemployment insurance, Temporary Assistance for Needy Families (TANF), Food Stamps (SNAP), housing assistance programs, state veteran's programs and state or local Individual Development Account (IDA) programs. While the federal parameters for these programs are described in Module 3B, there are many additional state and local rules that will vary based on beneficiary location..

Besides knowledge of state specific programs, SSA expects CWICs to participate in the supplemental training and technical assistance opportunities offered by the WIPA National Training Center (NTC) operated by Virginia Commonwealth University. Currently there are no specific requirements governing training hours or the number of training events that CWICs must participate in. There is a clear expectation, however, that all CWICs will access additional tutelage after initial certification is achieved. SSA also expects CWICs to take advantage of the technical assistance support provided by the WIPA NTC and its partners.

USE OF MANAGEMENT INFORMATION DATA TO IMPROVE PROCESSES AND BENEFICIARY TRACKING REQUIREMENTS

The SSA Office of Employment Support Programs (OESP) is committed to evaluating the overall WIPA initiative and the performance of each individual WIPA project. To accomplish this, OESP needs accurate and complete information on the activities of each WIPA program, which requires data collection to document the activities and successes of the WIPA projects. The data analysis will be shared with SSA and Congress as they consider the reauthorization of the WIPA program. Therefore, WIPA projects are now required to enter beneficiary and service data into a national database system known as Efforts to Outcomes or ETO.

Complying with Data Collection Requirements – The ETO

Data System ----- The WIPA ETO system is an internet-based data collection system. Only certified CWICs and project managers are permitted to access the system or enter data, and an assigned user name and a pass code are required to log in. All certified CWICs receive ETO system training and can access a detailed manual explaining the various functions and uses of the data system. As soon as provisional CWIC certification is obtained, CWICs should contact their WIPA Project Officer to obtain the URL for the WIPA ETO Data System and to request a user name and pass code.

The system is divided into two parts or, in ETO terms, two programs: (1) WIPA Initial Contact and Demographics – also referred to as the I&R program; and (2) WIPA Work Incentives Planning and Assistance. When CWICs first enter information about a beneficiary, he or she will be enrolled into the WIPA Initial Contact and Demographics, or I&R program, and an I&R Assessment completed. If CWICs provide more intensive WIPA services to an individual, the CWIC is required to first enroll that person in I&R, dismiss from I&R, and then enroll the person in WIPA. Once enrolled in the WIPA program, detailed information about the beneficiary's status and services provided is captured through a baseline assessment that focuses on goals, education, and employment status. Following completion of the baseline assessment, a new follow-up assessment should be completed for any beneficiary whose status changes in any of these areas.

The process for data entry is as follows:

1. Beneficiaries enrolled into I&R services – Projects should enroll all beneficiaries into I&R who meet the basic eligibility criteria for WIPA, have expressed an interest in receiving either basic I&R services or intensive, individualized WIPA services, and have received some services. All eligible beneficiaries must first be entered into the I&R program before entering the WIPA Program. If a beneficiary initially requests intensive, individualized WIPA services he or she must first be dismissed

from I&R, and then enrolled in the WIPA Program. OESP tracks beneficiaries enrolled in I&R. Additionally, an I&R Assessment must be completed for all beneficiaries enrolled in I&R.

2. Beneficiaries enrolled in WIPA services – This is the primary indicator used by OESP to track the activities of WIPA projects and to determine the costs of serving a single beneficiary. To the extent possible, projects should enroll appropriate and eligible individuals into WIPA services on a daily basis or at a minimum, weekly. This number is reported to SSA bi-weekly and is the primary variable used to capture the WIPA performance outcomes. Therefore, it is imperative that projects “dismiss” all appropriate individuals from I&R and enroll them into WIPA.
3. Baseline and Follow-Up Assessments – Baseline assessments are completed on all beneficiaries enrolled in the WIPA program. The baseline assessment is completed first - at the point in time that the beneficiary is enrolled in the WIPA program. Follow-up assessments are recorded only after the baseline assessment is complete, and are required each time the beneficiary experiences a change in employment, education or marital status that could impact benefits. To ensure that these assessments provide OESP with essential demographic and outcome data, CWICs are required to fill in every section.
4. Recording of Efforts – SSA is interested in the number of new beneficiaries receiving WIPA services as well as, tracking the extent to which beneficiaries receive ongoing work incentives assistance and support. According to OESP, ongoing follow-up services are an important indicator of overall services afforded beneficiaries. Following completion of the baseline assessment, CWICs should enter an effort every time a significant issue has been discussed or a service is rendered with or on behalf of a beneficiary.

COMPLIANCE WITH SSA POLICY ON CONFIDENTIALITY AND PRIVACY

The Cooperative Agreements for Work Incentives Planning and Assistance Projects; Program Announcement No. SSA-OESP-06-1 states clearly:

“All projects must adhere to SSA’s Privacy and Confidentiality Regulations (20 CFR part 401)** 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 SSDI and SSI beneficiaries with disabilities. Beneficiary data should be accessible only to project personnel via locked file cabinets, computer password protections, etc.”

** NOTE:.... Since WIPA Projects are required to adhere to SSA’s Privacy and Confidentiality Regulations the leadership of each WIPA Project is expected to be fully cognizant of all policies on confidentiality and privacy. These are the same rules that SSA employees are required to abide by. These rules can be accessed on the SSA website: http://www.ssa.gov/OP_Home/cfr20/401/401-0000.htm.

All beneficiary information provided to a CWIC is strictly confidential. Relevant data can only be released 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. The extent of information released must be carefully considered and should be limited to only what is necessary to provide knowledge about work incentive options available to the beneficiary. CWICs are required to use the SSA standard information release forms found through the following links:

- ▶ Authorization to Disclose Information to the SSA - Form SSA-827 (6-2007) Effective (6-2007) <http://www.ssa.gov/online/ssa-827.pdf>
- ▶ Consent for Release of Information - Form SSA-3288 (5-2007) Effective (5-2007) <http://www.ssa.gov/online/ssa-3288.pdf>

This policy applies to public reports created by the CWIC and utilized by individuals outside the WIPA projects, such as the state VR agency or an Employment Network working with a beneficiary. Refer to the basic rules below to protect a beneficiary's privacy and confidentiality:

1. Reports should only be shared with entities that the beneficiary has given specific, written authorization for release of information. All identifying information, such as the beneficiary's SSN must be removed before sending..
2. CWICs should never release information not generated by the WIPA, unless the request specifically includes the entity responsible for the data. WIPA projects are only permitted to release information that they generate such as BS&A reports, WIPs, intake interviews, or case notes.
3. Reports should include only identifying information that is absolutely necessary to provide quality services. It is recommended that WIPA projects confine themselves to the data items contained in the initial interview form found in Unit 2 of Module 6.
4. 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.
5. SSA requires all WIPA personnel providing services to beneficiaries to successfully complete a federal security clearance. Until this process has been completed, new staff, without exception, will not have access to beneficiary information and may not access information through the ETO data system. Questions about specific strategies to protect information should be directed to the SSA project officer.

Maintaining the confidentiality and privacy of the beneficiary is of utmost importance. All files and information contained within must be kept under lock and key when not in use and are only available to CWICs when open. For CWICs working from an alternate site, security features should mirror those in the home office.

ADDRESSING POTENTIAL CONFLICTS OF INTEREST

All WIPA projects must document how they plan to prevent a conflict of interest when providing work incentives planning and assistance services and delivering employment network-related services or protection and advocacy-related services to beneficiaries in their employment efforts. State Vocational Rehabilitation (VR) agencies and other organizations that serve as WIPA providers under SSA's Ticket to Work and Self-Sufficiency Program, must also explain how they will resolve potential conflicts of interest. WIPA projects must have written grievance procedures that they share with beneficiaries to demonstrate how issues will be resolved when a complaint is made against a Community Work Incentives Coordinator (CWIC) or WIPA organization.

QUALITY ASSURANCE PLAN REQUIREMENTS

SSA clearly articulated in the RFP (Federal Register/Vol.71/No.94/Tuesday May 16, 2006/Notices) its expectation for applicants to have written quality assurance plans that consider both the anticipated outcomes of the program as well as the ethical standards required to meet those outcomes. The RFP requested that these plans include the five areas listed below:

1. **Training** – On-going updated training as needed for CWICs and other personnel to maintain knowledge, skills, and abilities as required to perform job functions in a manner consistent with ethical standards.

2. **Use of Management Information Data to Improve Processes** – Management information data and caseload reviews will occur periodically to improve processes such as beneficiary case management and follow-up services. Attention will be focused on ensuring that work incentive information is accurate and applicable to the beneficiary’s current situation. Caseload and file reviews will be used to determine continuing education needs for each CWIC.
3. **Beneficiary Tracking** – Beneficiary progress and outcomes from WIPA services will be tracked. This tracking is designed as an outcomes measurement tool to determine the extent to which beneficiaries achieve their employment, financial, and health care goals. Information collected will include: employment status, benefit status, and income of beneficiaries before and after receiving services under the WIPA program.
4. **Case Management** – Programs require case management and monitoring systems in place, including a management information system that will allow each CWIC to provide high quality services to each beneficiary while maintaining a maximum, workable caseload allowing for accurate, useful information in a timely manner.

A detailed discussion of strategies for developing a functional quality assurance plan is available in Unit 3 of this module.

Conclusion

WIPA projects operate under a cooperative agreement with SSA, who 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

Authorization to Disclose Information to the SSA - Form SSA-827 (6-2007) Effective (06-2007)
<http://www.ssa.gov/online/ssa-827.pdf>

Consent for Release of Information - Form SSA-3288 (5-2007) Effective (5-2007)
<http://www.ssa.gov/online/ssa-3288.pdf>



Competency Unit 2

Quality Assurance for Individual CWICs: The Importance of Professional Ethics

ETHICS AS A QUALITY ISSUES

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. WIPA services are further complicated by the complexity of the information disseminated. It is not enough for CWICs to completely grasp the content of the work incentives material to provide the highest quality services. CWICS must also uphold stringent ethical standards and principles in performing their job function 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 which WIPA personnel must consider in their professional decision making and when challenged by difficult ethical dilemmas. The purpose of this code of ethics is to:

- ▶ Define acceptable behaviors 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 cannot guarantee ethical behavior. Moreover, a code of ethics cannot 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 that personnel must adhere to.

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** – Each person served must be viewed as an individual and not as a member of a disability group. Beneficiaries have unique interests and goals and require benefits based on values, preferences and personal situations, which may not reflect their disabilities. WIPA services must not be executed and 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 informed choices about employment. This includes explaining why one course of action may be preferable to another. The final decision about the path or action to be taken must be made by the beneficiary, even if that choice is contrary to CWIC advice. Ethical behavior on the part of the CWIC can only encourage beneficiaries to make employment choices in their best interests; they cannot impose their own opinions on others.

- ▶ **Maintaining a Non-Judgmental Approach** – While CWICs may offer advice based upon their benefits’ expertise, it is inappropriate to express judgments about beneficiary decisions. CWICs must understand that the WIPA initiative does not judge individuals who decide not to pursue employment or who opt to work below their capability level. Furthermore, the WIPA initiative does not 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 are required to gather a wide range of financial and personal data about the beneficiary. In some cases, this includes information about the individual’s disability found in medical or psychiatric records. These papers and records must be kept strictly confidential and may not be disclosed 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 take precautions to ensure and maintain the confidentiality of information transmitted to other parties through the use of 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.

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 mathematical error can

have a disastrous effect on an individual's ability to pay for food, housing, utilities, or essential medical services. It is crucial that CWICs recognize the power they wield through 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 knowledge and skill and apply this training effectively.

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. The results of these self-assessment efforts should be a catalyst to best determine CWIC professional development. Taking personal responsibility for developing professional skills is not optional – it is 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.

Principle 3 – Serving Beneficiary Interests While Promoting Employment and Self-Sufficiency -----

CWICs must remain focused on serving the best interests of the beneficiary, while balancing it with the primary objective of the WIPA program – promoting employment and self-sufficiency. In most cases, these two goals work in tandem, but on occasion, they can conflict with one another. CWICs offer work incentives planning and assistance to maximize the financial benefit from working while minimizing adverse effects of earning on meeting costs for basic needs. To accomplish this, the CWIC must use his/her knowledge and expertise to inform the beneficiary of all positive and negative aspects of any chosen path and offer advice about the best course of action to pursue.

It is important for CWICs to balance WIPA emphasis on paid employment with common sense. Occasionally, working at a certain income level or working to the point of benefit termination would not be in the best interest of the beneficiary. For example, an individual who relies on a Medicaid waiver program to pay for attendant care services would not be able to replace this benefit if it were lost due to excess resources or income. In this instance, advising a beneficiary to engage in employment that would jeopardize an irreplaceable and possibly life-sustaining benefit would be unethical. The WIPA objective is to assist beneficiaries in increasing financial well-being while retaining necessary services.

Terminating from benefits is not harmful to the beneficiary in the majority of cases. In fact, individuals with the capacity to generate earnings sufficient to cause benefit termination may be better off financially – as long as all costs of employment are weighed and health care needs continue to be met. The CWIC must work with each beneficiary individually to determine that person's goals and support the claimant to achieve the highest earnings potential possible within that predetermined framework. Counseling techniques or messages which discourage beneficiaries from working or frighten them into maintaining an attachment to public benefits are contrary to what WIPA services are trying to achieve.

WIPA personnel must maintain clarity about the beneficiary's interest. The CWIC is an advocate for the adult beneficiary and his/her interests, not for what the parent, representative payee, job coach, residential services provider, vocational rehabilitation counselor, or SSA claims representative thinks is best. There will be times when it is very difficult to balance competing interests. The best course of action is to always stay focused on the primary recipient of your services as well as the primary objective of the WIPA initiative – promoting employment and self-sufficiency.

Principle 4 - Avoiding Conflicts of Interest

----- A potential conflict of interest arises any time the CWIC, or his/her employer, has a real or apparent discrepancy with the beneficiary. This may occur when SSA or another agency that is 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 SSA or another agency that is responsible for deciding issues related to the beneficiary's case. Or where the CWIC, or his/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 SSA's Ticket to Work program, or by a Protection & Advocacy agency also delivering PABSS services.

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/she agrees despite the conflict. The disclosure and subsequent approval to continue services should be confirmed in writing to avoid future misunderstandings and to ensure that both parties are committed to working together.

Principle 5 – Maintaining Personal Integrity

In deciding the proper course of action in any counseling situation a CWIC must rely on his/her own internal moral compass or conscience. While the CWIC is obligated to zealously pursue the interests of the beneficiary, this goal must be met within the bounds of what is otherwise legal and ethical. The CWIC is not expected to strive to attain the beneficiary's interests if SSA's (or another agency's) laws, regulations, and policies clearly preclude what the beneficiary is seeking. If it appears that there is a conflict between what the beneficiary desires and what the CWIC knows is the responsible course of action, the CWIC must clarify why it is not appropriate to take those steps.

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 a course, they are ethically bound not to report confidential information to SSA or any other agency. In addition, the CWIC must advise beneficiaries in a non-judgmental tone. A simple statement concerning the law, regulation or policy's requirements, and a brief explanation that illicit action may impact the CWIC's ability to continue to provide services, is sufficient. An ethical CWIC guides beneficiaries to make proper choices through thoughtful discussion about the benefits of one plan over another. If after advisement the beneficiary still insists on an improper course of action, it is best for the CWIC to discontinue WIPA services.

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 does not 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 does not 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 are not 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 -- <http://www.naswdc.org/pubs/code/default.asp>

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/mc/page.do?sitePagelId=89927&orgId=nohs>

Federal Contractor Code of Business Ethics and Conduct -- <https://www.acquisition.gov/far/html/Subpart%203.10.html>



Competency Unit 3

Quality Assurance Strategies for WIPA Projects

INTRODUCTION

To achieve continuous quality improvement, all WIPA projects should establish and conduct an annual review of program services and practices to determine what is working well and where there may be problem areas. This yearly review process should also consider feedback obtained from customer and stakeholder surveys, which may indicate dissatisfaction with aspects of WIPA services. Once concerns are documented, the next step is to develop a strategic plan for improvement, utilizing quality indicators. Engaging both management and direct service staff in the development and maintenance of this quality assurance plan will provide an opportunity for review and discussion and a renewed commitment to quality services. In addition, it is an opportunity to further staff consideration and understanding of the ethical obligations of all people involved in the organization. At the very least, quality assurance plans should be reviewed and updated on an annual basis.

COMPONENTS OF A WIPA QUALITY ASSURANCE PLAN

Although there is no single model for a WIPA quality assurance plan, there are core elements that all plans should contain. The first component is quality indicators – the specific benchmarks attained when quality services are evident. These are the outcomes that the project is striving to achieve. Identification of these indicators or goals is the first step, which drives all subsequent work. While there may be variances among projects, a generic list of quality indicators for WIPA services includes the following (not in order of importance):

- ▶ All benefits are verified for accuracy.
- ▶ BS&A is individualized for each customer.
- ▶ The beneficiary returns for more services and begins an ongoing relationship with WIPA staff.
- ▶ The beneficiary calls back to say he/she has gone to work.
- ▶ A CWIC receives a thank you note or letter from the beneficiary, family member or community partner.
- ▶ The beneficiary refers others to the WIPA program.
- ▶ Repeated requests for outreach presentations come from the same referral source.
- ▶ The beneficiary is able to correctly relate what the CWIC said about how work would affect benefits during the initial interview.
- ▶ The beneficiary is able to advocate on his/her own behalf, using the information provided by the CWIC.

For each quality indicator or goal, the plan should include a description of how it will be measured or evaluated and on what schedule evaluation will occur. There should also be a clear indication of who is responsible for tracking or measuring the indicator. Here are additional tips to ensure a quality assurance plan is successful:

1. Indicators need to cover the three main areas of quality assurance relevant to WIPA services – accuracy, thoroughness and timeliness. Projects should identify at least three indicators or goals in each category, then track and evaluate. Possible indicators in each area are provided below:

Accuracy

- ▶ CWICs attend training beyond the initial training;
- ▶ CWICs meet regularly for case review bringing challenging cases to the group;
- ▶ All BS&A reports are reviewed by at least one other person with content expertise before they are sent to the customer;
- ▶ All CWICs send at least one BS&A per quarter to the TA Liaison for feedback; if an internal process for reviewing reports is not in place, consider increasing the number and frequency;
- ▶ BS&As are reviewed by someone with editing ability for writing style and readability;
- ▶ CWICs conduct independent research using the POMS or the Code of Federal Regulations, state Medicaid eligibility handbook, Food Stamp handbook, etc., to discuss their findings with co-workers;
- ▶ CWICs develop a special area of content expertise, such as long term disability or understanding the work CDR process; and
- ▶ The WIPA manager and staff develop cooperative relationships with local benefits resource experts such as a work incentives liaison, the area work Incentives coordinator, a technical expert in the local SSA field office, a Medicaid analyst with the state, a manager of the local housing authority, the local legal services provider, the protection & advocacy agency, or a trainer in a county or regional office with knowledge of all income maintenance programs.

Thoroughness

- ▶ All new cases are reviewed at CWIC staff meetings or by a qualified supervisor to ensure that no major counseling issues are missed.
- ▶ All BS&As are comprehensive and individualized to the customer's specific benefit profile; managers or senior CWICs review files on a regular basis to ensure thoroughness.
- ▶ Managers do not set expectations that result in reports being written before all information is thoroughly verified and the customer's issues and concerns can be addressed.
- ▶ All information is presented in a manner that is accessible and usable by the beneficiary.
- ▶ Direct supervision is provided on a weekly basis – cases are reviewed and timelines for completion of services for each individual are set.
- ▶ All contacts between a customer and a CWIC are logged in an electronic database or case management system, which can be accessed by the manager/supervisor. Contact logs are reviewed at least monthly and problems noted are addressed with the CWIC and corrected with the customer. If the supervisor carries a caseload, the supervisor's work plan should build in time for the review of other CWICs' work.

Timeliness

- ▶ Managers set realistic expectations when assigning cases to a CWIC and establishing a service protocol based on the survey and time studies performed in the course of quality assurance reviews.

- ▶ New referrals are contacted within 24 to 48 hours to schedule an initial meeting.
 - ▶ No more than a 1-2 month period should be allowed between the initial contact to presentation/ mailing of the BS&A to the customer.
 - ▶ BS&A reports are completed and reviewed with beneficiaries within one week of receiving the BPQY and all other verifying information.
2. Projects are cautioned to start slow and to limit the number of indicators by which they measure performance. If too many indicators are selected at once the plan will be overly complicated and too time consuming to carry out. Start with five or six key indicators and invest time in developing a thoughtful (and doable) plan for measuring actual performance against the quality indicator.
 3. Do not select indicators that are too process-oriented. The object is not to measure how services are delivered, but rather the outcomes that are produced. Allow yourselves some practice to get used to measuring results as opposed to processes.
 4. Choose indicators that really matter as opposed to program elements that are not particularly meaningful. It is often easier to measure small things since the important results can be very challenging to evaluate. Do not over simplify – strategize as a team to develop a functional assessment plan. Expect to have to “tweak” the evaluation process and learn lessons over time.
 5. Involve all staff in the quality assurance process. Everyone should be clear on project goals or indicators and have a role in the measurement. When projects reserve quality assurance tasks for a select few, others do not feel invested in improving quality. Everyone needs to play a role in the process.
 6. If a goal or indicator seems hard to measure, get help. WIPA NTC staff may assist with brainstorming on unique ways to measure achievement of a particular goal and can share ideas gleaned from other projects.
 7. Use WIPA colleagues to identify meaningful outcomes. What indicators are other projects tracking? What innovative evaluation methods are WIPA projects testing? How are other CWICs getting involved in the quality assurance process? Ask questions and share your own experiences and expertise with others.
 8. When a quality indicator is met, raise the bar instead of accepting status quo. Think about how to constantly improve services. If a particular area has been focused on extensively and improvements have been made, try working on another area.
 9. Take a hard look at the project’s shortcomings. No one is perfect and there is no shame in admitting it when the WIPA project does not perform as well as expected. The trick is to be proactive, attacking problems and solving them.
 10. Do not overcomplicate the measurement process. CWICs are very busy with many responsibilities. To the extent that the quality assurance plan adds administrative work, it risks not being completed or done haphazardly. Involve the CWICs in the planning process to determine the most efficient manner for measurement to occur.

Sample WIPA Quality

Assurance Plan ----- The plan documented below is indicative of a WIPA project that has experience measuring quality based on the number of indicators, which are referred to as “goals.” A project with less experience might want to start with fewer indicators and build the plan over time.

Goal	Measurement	Responsibility	Timeline	Status
All benefits, entitlements and subsidies received by the individual and impacted by earned income or work activity are included in the benefits analysis.	Quarterly review of records to ensure accuracy of plans Regular peer review of benefits planning and analysis	CWICs to conduct peer review on plan. Manager to conduct quarterly chart audit.	Ongoing audit process in January, April, July, and October	
All information gathered for the analysis is verified by the agency administering the benefit, entitlement, or subsidy, or reason for no verification will be stated in the analysis.	Quarterly review of records to ensure effectiveness	CWICs to keep accurate records with verification.	Ongoing audit process	
Initial contact with customer occurs within two business days of individual request for service.	Review of records to ensure efficiency	CWICs to document timelines. If timelines are not met, reason is stated in record. Manager to verify secretary's phone logs with benefits contact sheets.	Ongoing audit process	
Benefits Summary and Analysis and WIP (if needed) are completed within 30 days of initial intake for high priority referrals and within 30 days of beginning of job search for low priority referrals.	Review of records to ensure efficiency Requests for verification of benefits and entitlements occurs within 48 hours of initial contact Based on customer needs, documentation of timelines for services will be prioritized (priority services for individuals working or ready to begin employment).	CWICs to document timelines. If timelines are not met, reason is stated in record.	Ongoing audit process	
Responses to requests for information and referral/problem solving occur within one week of referral.	Review of records to ensure efficiency Records indicate initial contact and disposition of information and referral, and/or response to customer's request.	CWICs to keep documented record of all requests for information and record of service/information or referral provided.		
Touch points are developed for ongoing follow-up with benefits assistance.	CWICs keep contact information in record, and schedule dated for follow-up. Record indicates attempts to follow-up with individuals.	CWICs Review of individuals needing follow-up in team meetings.	Monthly team meetings to review follow-up Individual follow-up as scheduled with counselor and individual	

Goal	Measurement	Responsibility	Timeline	Status
Confidentiality is maintained at all times.	Records contain release of information for all documented contacts on the individual's behalf.	CWICs	Ongoing audit process	
Information is reported to the individual in an objective manner and understandable manner.	Records indicate alternative formats when needed. Plans are explained in concise information with explanation of how SSA or other agencies calculate benefits.	CWICs to use peer review process as needed. Managers to follow-up in review.	Ongoing audit process	
CWICs participate in ongoing continuing education on a quarterly basis.	Team meeting in-services and TA with project assistant on a quarterly basis All counselors to participate in quarterly continued education through workshops, in-services, webcasts, etc.	CWICs, Project Managers and Director Quarterly training		
Staff objectives for performance that are reviewed by Project Manager and Director and contracting host agency.	Performance objectives developed annually for staff through project.	CWICs and Project Manager	Annual review to occur in 2010.	
Customer satisfaction surveys indicate satisfaction with services.	Surveys indicate satisfaction with efficiency, effectiveness and accuracy of information. Follow-up interviews with individual customers indicate decision making around work efforts and implementation of work incentives.	Project Manager to distribute and collect satisfaction surveys, and conduct interviews.	Monthly random distribution of satisfaction surveys	
Marketing and outreach increases referrals for SSDI beneficiaries and SSI recipients.	Marketing is targeted to diverse group of beneficiaries and recipients, and organizations supporting individuals. Referrals come from various agencies and organizations across all Southern Indiana counties in catchment area.	Manager to conduct quarterly analysis of results and update marketing plan.	Quarterly Market Analysis Bi-monthly marketing plan update	

CONCLUSION

Planning for continuous quality improvement is not an event that a WIPA program engages in once a year. It should be reflected in the day-to-day operation with everyone participating in the program. A quality assurance plan must “belong” to the entire staff, management and CWICs alike. Once the plan is developed, there must be effort made to measure actual performance against the goals and to take corrective action as necessary. The next unit provides specific information about accomplishing these tasks.

CONDUCTING INDEPENDENT RESEARCH

Built to Last: Successful Habits of Visionary Companies by James C. Collins and Jerry I. Porras, Harper Collins, N.Y. 1994

Good to Great: Why Some Companies Make the Leap...and Others Don't, Jim Collins et al, Harper Collins, N.Y. 1991

The Deming Cycle by Paul Arveson, (1998) – http://www.balancedscorecard.org/The_DemingCycle/tabid/112/Default.aspx

Deming Distilled: Essential Principles of TQM by A. Mead (1996) – <http://well.com/user/vamead/demingdist.html>

Competency Unit 4

Quality Assurance Planning for WIPA Projects

INTRODUCTION

To engage in continuous quality improvement, WIPA personnel must believe that there is always room for improvement in every service and in the processes used to provide those services. If quality is defined as meeting or exceeding the expectations of customers, the first step is to determine what those expectations are. The second step is to measure the extent to which customers are getting what they need based upon those expectations. The third step is to identify areas of program weakness and develop a strategic plan for rectifying inadequacies.

Continuous quality improvement and programmatic development should focus on improving processes, not on blaming individuals for program issues. Changes do not have to be large to have a positive impact. Small, incremental changes that are implemented in a thoughtful manner are not only smart, but are easier for program staff to accomplish.

IMPORTANT: Continuous quality improvement is the responsibility of both WIPA management and the individual CWIC. Everyone is responsible for improving the quality of services – not just managers.

UNDERSTANDING THE FEEDBACK LOOP

Quality improvement requires soliciting input and feedback from all stakeholders or customer groups. This input can be gathered through formal program evaluation and satisfaction surveys, analyzing service data collected on a regular basis, or by conducting peer review of beneficiary records. Maintaining objectivity as the results are compiled is of utmost importance to ensure that an honest appraisal of quality is made. The data that is gathered must then be used to develop a plan for improvement. To guarantee quality assurance success, WIPA programs must keep the improvement focus on the process for providing WIPA services, actively engaging all staff in the organizational assessment and quality improvement plans.

Quality improvement is a circular process, which never ends. WIPA projects must constantly seek feedback from as many sources as possible and utilize that feedback to make improvements. Over time, new quality improvement goals will be identified and the process will start over. Methods for



improving processes and outcomes may not always work to the extent anticipated, making it necessary to repeat the steps. The best way to conceptualize this process is to think of a “circle of quality.” The cycle is often referred to as the PDCA cycle (Plan/Do/Check/Act).

The first step, “planning,” requires careful analysis of the information available, the resources that can be utilized in the plan, as well as the timeframes in which the work needs to be done. The plan should be comprised of a series of measurable action steps with identified timeframes and people who are responsible for carrying out the tasks. The second step – the “do” part – involves the implementation of the planned activities. The third step, “checking,” is the phase of the cycle in which the plan and implementation phases are evaluated to see if they worked successfully based on the expected outcomes. In the final stage of the cycle, WIPA personnel “act” by taking the information gained from the evaluation process to identify what changes need to be made to the overall plan to produce the desired results.

WIPA programs must create a functional feedback loop to include the four cycle steps in order to improve outcomes for beneficiaries. The WIPA feedback loop is characterized by the following tasks performed in this order:

1. Identify WIPA program goals and objectives relative to providing services to customers and stated in measurable terms;
2. Create the tools to measure success in meeting goals and objectives;
3. Gather input from all stakeholders, e.g. customers, referral sources, community partners;
4. Compile the input gathered and prepare it for dissemination in reports to staff, administration, board of directors, and community stakeholders;
5. Discuss the outcome of measures with staff;
6. Engage the staff in developing a plan for improvement;
7. Implement process improvements on an ongoing basis; and
8. Review the quality assurance plan at regular intervals during staff meetings.

The PDCA cycle can be used by individual CWICs as well as WIPA projects. CWICs can ensure that they are planning what they do, doing what they have planned, checking the plan, and then incorporating what they have learned into a new plan. WIPA managers can apply the PDCA cycle on a larger scale to plan overall project activities and assess actual implementation against the plan.

METHODS FOR GATHERING FEEDBACK

During the “check” phase of the PDCA cycle, WIPA projects are encouraged to utilize as many different methods for collecting data about the quality of services as possible. Some of these methods will focus on “internal” stakeholders – including CWICs and WIPA project leadership. Other methods focus on “external” stakeholders, which include beneficiaries, their family members, community partner agencies, referral sources, and SSA. No single method of gathering feedback is sufficient to tell the whole story since different customer groups will have diverse opinions about the quality of services. WIPA projects seek input from all parties using as many different techniques as possible to elicit a complete and accurate picture of what is working and what needs to be improved. The most common approaches for obtaining information related to quality assurance are described below.

Peer Reviews ----- Peer reviews (CWIC to CWIC) are a useful tool when WIPA projects have multiple CWICs. They may include one CWIC reviewing and commenting on the work of another; or team meetings in which cases are presented to a group who identify and discuss plans of action. The group meetings give CWICs the opportunity for peer insights and unique perspectives, which were not evident previously. A group approach to case review also ensures that all potential work incentive options are identified and explored. CWICs should be encouraged to bring difficult cases to these discussion sessions to provide valuable learning experiences for their peers.

First Level Supervisor or Team Leader Reviews

This strategy engages the team leader or first level supervisor in a scheduled or unscheduled review of completed work. The reviewer is evaluating the work for timeliness, completeness, accuracy, and evidence of good working relationships with partnering agencies and with beneficiaries. This type of review is a necessary supervisory activity and should be considered the primary responsibility of those who directly supervise CWICs. The individual acting in the supervisory capacity should be a certified CWIC to ensure that information provided and strategies suggested comply with all programmatic and ethical goals.

Results of these reviews should be aggregated and analyzed to identify trends and areas that appear to be challenging across the staff. This analysis should be used to determine in-service training sessions or areas that require in-depth technical assistance.

Reviews Performed by NTC Technical Assistance Liaisons

Although formal project monitoring and evaluation are not the role of the WIPA NTC technical assistance liaisons, WIPA projects may benefit from having the TA Liaison perform an occasional "mock evaluation" to identify areas that need improvement. Another strategy employed by WIPA projects is asking the TA Liaison to sit in on regularly scheduled team meetings or teleconferences in which beneficiary cases are discussed. The liaison can help CWICs work collaboratively to share ideas and potential solutions to difficult cases and can offer direction on challenging work incentive scenarios.

In addition to working with the liaison in a group setting, CWICs are encouraged to ask the liaison to review BS&A reports. Submitting a BS&A with the BPQY and asking for feedback is an excellent way to sharpen advisement skills. The technical liaison may be able to spot an area of concern and will offer tips on how to develop the most accurate and user-friendly reports. TA liaisons can also perform record reviews and can advise on other written documents such as Work Incentives Plans, requests for IRWEs and Subsidies as well as correspondence to SSA.

QUALITY ASSURANCE TIP: Asking for feedback on written work from the NTC Technical Assistance Liaison is CWIC's most direct form of quality assurance.

Seeking Input from Customers – Beneficiaries, Family Members and Stakeholder Agencies

WIPA programs should gather feedback routinely from both primary customers (beneficiaries receiving services) and secondary customers (agencies making referrals/partnering with the WIPA) using satisfaction surveying techniques. Customer satisfaction surveys should always include questions about timeliness. For example, the survey question would ask whether CWICs who are required to return initial calls within 24-48 hours and set-up intake meetings within one to two weeks following the referral (for high priority beneficiaries) are maintaining that timeframe for contact.

Verifying benefits is a variable that may impact timeliness; though some WIPAs still report delays in receiving the BPQY from the local SSA offices or returned calls from the Medicaid agency. Once all benefits are verified, the BS&A should be written in the shortest time possible. If too much time passes, the person's benefit situation can

change; the person may be forced to turn down a job offer if he/she lacks the information needed to make an informed decision; or the opportunity to use a work incentive such as PASS may be missed. Most WIPA projects report the ability to complete the BS&A within one to two weeks after the benefits are verified and the analysis completed.

In addition, customer feedback should include questions about satisfaction with the service, usefulness and accessibility of the information given, and suggestions for improvement. Samples of customer satisfaction survey tools are included at the end of this unit. While management bears the obligation to conduct periodic surveys, individual CWIC should provide survey forms to each beneficiary. These forms should be reviewed by the CWIC to provide a better quality product to the next consumer and may be used by management to determine if the WIPA operation is running smoothly.

Site Visits Performed by SSA -----

SSA performs periodic site visits to WIPA projects to ensure that each project is providing benefits planning assistance and outreach services to eligible SSI/SSDI beneficiaries with regard to return to work issues as mandated by SSA's Cooperative Agreement monitoring requirements. During the site visit, SSA personnel will meet with the agency executive director, WIPA Project Manager and other project staff that the director deems necessary. During this meeting, SSA expects management to present an overview of project activities, which may include a review of quarterly reports, identification of any changes in the proposal, and a discussion of problems, issues or concerns. The following areas will be reviewed and evaluated during the site visit.

1. Outreach Activities and Level of Service to Beneficiaries – SSA will review outreach activity and assess effectiveness of outreach methods.
2. Case File Review – SSA will randomly review WIPA case files to ensure proper data is being maintained.
3. Security of Files – SSA will ensure that the files are secure.
4. Staff Responsibility -- SSA will review the organizational chart and job functions.
5. Staff Certification -- SSA will insure that WIPA personnel have been trained and certified.
6. Personnel/Recruitment Issues – SSA may review the Form G-Personnel sheet and discuss or review any training needs and/or issues regarding staffing, field assignments, etc.
7. Fiscal/ Financial Issues -- If the Office of Acquisitions and Grants (OAG) staff accompanies SSA to the site visit, business procedures (i.e., accounting, administrative, and personnel policies and organization) will be evaluated.
8. Equipment -- If the project has purchased additional equipment, SSA will oversee this inventory.
9. Collaborative Relationship with Other Agencies -- SSA will discuss the project's relationship with state agencies, the local & regional Social Security offices, and the WIPA technical assistance contractor.
10. Data Collection Activities -- Data collection activities will be evaluated.

11. Quality Assurance Activities – The project’s quality assurance procedures will be evaluated.
12. Accessibility/Accommodations -- Accessibility and accommodation issues will be addressed in reference to accessing the building and accommodating people inside the facility to include not only people with physical disabilities but also those individuals who require Braille and American Sign Language, for example.

A written report summarizing the findings of the site visit will be prepared and sent to the WIPA project leadership. The report will contain specific recommendations for improvement or corrective actions required by SSA, which should be incorporated into the project’s quality improvement plan.

BEST PRACTICES IN ASSURING QUALITY OF WIPA SERVICES

In most WIPA programs, overseeing continuous quality improvement is the responsibility of the WIPA program manager/director. Occasionally, a lead CWIC will be assigned the task of ensuring quality among the entire staff. This may be necessary in situations where the manager/director has not been certified. Quality in any service organization is ultimately the responsibility of the top administration (i.e., the CEO or executive director). This section provides information on techniques for WIPA leadership to use to determine the quality of services being provided by CWICs and to enhance overall service quality.

Staff Recruitment and Screening

-----As mentioned in Unit 1, SSA expects WIPA projects to provide services using qualified personnel who have received comprehensive training in SSA benefits and employment supports as well as other federal, state and local benefits available to beneficiaries. Quality assurance begins with the initial recruitment, screening, and hiring of a CWIC. Prior to that process, the program manager or WIPA project director must understand the CWIC’s role and the skills, knowledge and attitudes required of the position. A solid grasp of the job functions will enhance the manager’s ability to recruit and hire the best people to fill the CWIC slot. For this reason, it is highly recommended that the manager attend CWIC training and complete the certification process.

The WIPA manager/supervisor must look for prerequisite skills and knowledge including excellent written and oral communication skills and the ability to solve problems or think analytically. During the recruitment and interview process, job criteria are thoroughly explained and the applicant’s ability for job training can be tested. Some WIPA projects give applicants the Red Book to review prior to the interview, and ask them to bring a sample of their writing – explaining the trial work period to a beneficiary, for example – when they come for the interview. Technical content can be learned in training sessions and on the job, but the learning curve for technical writing is very steep. The ability to write in simple, but clear language is imperative. Additionally, for those WIPA programs serving minority beneficiaries where English is a second language, the CWIC’s ability to read and write in English is only half the battle. Their ability to accurately convey complex information in a foreign language, orally and in writing, must also be carefully examined. A bilingual CWIC must be able to communicate in both English and the other language in order to be a fully effective CWIC.

NOTE: At the end of this unit, we have provided a complete listing of the CWIC responsibilities and competencies taken directly from Cooperative Agreements for Work Incentives Planning and Assistance Projects; Program Announcement No.SSA-OESP-06-1, which was published in the Federal Register Vol. 71, No. 94, Tuesday, May 16, 2006. All WIPA personnel

should review this list to make certain there is a clear understanding of SSA expectations for CWICs. WIPA project managers are advised to carefully consider this list whenever making hiring decisions within the WIPA program!

Staff Training and Development

Given the importance of a CWIC possessing certain skills and knowledge, WIPA programs ensure quality by establishing a protocol for ongoing training and technical assistance. It is a contractual requirement that WIPA programs provide state-specific training to all CWICs. The unique aspect of Medicaid (including Home and Community Based Waivers), subsidized housing programs, Energy Assistance Programs, Worker's Compensation, Unemployment Insurance, SSI State Supplement(s), and other state disability programs make it imperative that CWICs receive comprehensive training about all benefits, entitlements and income-sensitive services used by people with disabilities in each individual state.

WIPA managers are encouraged to collaborate with other WIPAs to coordinate training in state-specific benefits and services for CWICs. In a number of states, WIPA projects have either formed or joined a statewide coalition of benefits planners and work jointly to identify and invite speakers on topics of interest to the CWICs (i.e. personnel from the state Medicaid office to talk about Medicaid Buy-In, staff from workforce development or State Department of Labor to explain unemployment benefits, etc.). WIPA projects should consider forming a statewide or regional coalition of organizations providing work incentives planning and advisement services, if none already exists. Sharing resources with other WIPA programs eliminate duplication of efforts and can significantly enhance the ability of each program to provide a quality service in an efficient and effective manner.

A WIPA manager serious about quality assurance will arrange for all CWICs to attend trainings or take online courses and makes every effort to ensure that operational budgets allow for continuing education efforts for all CWICs. However, outside training alone will not ensure that a CWIC becomes proficient. "On-the-job" training is essential. There are several approaches that a manager should use to ensure that a CWIC develops competency:

Intensive supervision – New CWICs require intensive supervision to develop the knowledge base and skills necessary to be effective. If the WIPA manager is trained and experienced at providing direct services, he/she is in the best position to closely monitor the ongoing knowledge development and learning curve in a new CWIC. If the manager is not a certified CWIC, a "senior" CWIC could be given the responsibility to serve in this supervisory capacity. Techniques utilized during this intensive supervisory period to develop professional and greater CWIC competency include the following:

1. The opportunity for a new CWIC to "do-over" a benefit summary and analysis (BS&A) already completed by an experienced CWIC in order to practice writing skills.
2. The opportunity for the inexperienced CWIC to shadow co-workers during initial intake interviews as well as meetings in which the BS&A is presented to the beneficiary.
3. Daily or weekly supervisory meetings with the CWIC to review work progress and answer questions.
4. Review of all BS&A reports written by a new CWIC for accuracy and style during the first 6-12 months on the job.

Mentoring – If the WIPA is fortunate to have experienced CWICs on staff who are able to mentor a new staff member, this is an excellent way to structure learning on a day-to-day basis. The mentor can serve as both a teacher and role model for a new CWIC, and help sharpen the skills of more experienced CWICs. This type of mentoring should be written into a senior or experienced CWIC's work plan as part of that individual's personal and professional development. The following activities would be part of the CWIC mentoring process:

1. The new CWIC works as an assistant to the mentor by helping to verify benefits information, and participates in strategy/planning discussions while gradually assuming more direct contact with beneficiaries.
2. The mentor conducts one-on-one case reviews with the new CWIC, helping identify potential work incentive options, and explains approaches for supporting beneficiary success in employment.
3. The mentor observes the CWIC during an intake interview and work incentives planning session and offers feedback on strengths and areas in need of improvement.
4. The mentor will recommend when the CWIC is ready for independent work and identify areas requiring additional training or support.

Although mentoring is a powerful training tool, managers need to be aware of potential for promoting undesirable practices. Mentors must be selected carefully to ensure that the highest quality standards are taught.

Effective use of technical assistance – if the WIPA manager is not trained in the program's technical content or if co-workers have neither the time nor the experience to mentor a new CWIC, the manager should arrange for the TA liaison to work closely with that person until ready to function independently. The liaison can review redacted reports prepared by the new CWIC, provide feedback on content and style and make recommendations to the manager regarding additional training needed. Direct and consistent contact with the liaison will also contribute to a good working relationship.

Use of Management Information Data to Improve Processes

WIPA program managers should use a management information system to monitor the work of the line staff. This can be as sophisticated as an electronic case management system such as ETO or as simple as keeping a log or a spreadsheet to track the work incentives planning process for each customer. Using a tracking system will ensure that services are provided in a timely manner, essential to the needs of WIPA customers, and will further guarantee that no beneficiary "falls through the cracks."

Since timeliness for service delivery is an important quality indicator, CWICs should document the following service dates:

- ▶ Response to initial referral or request for services;
- ▶ Date that releases are sent to customer for signatures;
- ▶ Date that the BPQY is requested from SSA;
- ▶ Date of initial intake meeting or contact; and
- ▶ Date the BS&A report is completed and either presented or mailed it to the beneficiary with a follow-up call to respond to questions.

A management information system is useless if no one is reviewing the documentation on a regular basis. The WIPA manager should compile the data gathered from the tracking system and the customer/stakeholder surveys to share and discuss favorable

responses or need for improvement with staff during a strategic planning or quality improvement meeting or at each staff meeting.

Beneficiary Outcome Tracking – Measuring Results

Outcomes achieved by WIPA customers can be used to determine where service improvements or changes need to be made. Since the goal of the WIPA project is to help beneficiaries make informed decisions about working, one measure of success is the number of people who make the decision to return to work. Unless the WIPA is pro-actively reaching out to beneficiaries after they receive WIPA services, there is no way to know if the service resulted in employment.

Scheduling follow-up contact on a regular basis will allow CWICs to ask about employment, wages, health care, or need for other services/supports. Documenting the employment outcomes and the work incentives used can be done in an electronic database or logged onto a paper form. Some WIPA projects schedule follow-up calls to beneficiaries who do not require intensive follow-along services at 3-month, 6-month, and 12-month intervals, after the intensive service has been provided. While this is a simplified system of maintaining follow along services, the use of the WIP and future updates should provide an effective guide to follow along services for the return to work effort as well as to provide outcome data.

Based on the priority ranking of potential WIPA customers, the following questions may be asked to gather employment outcome data:

- ▶ Did employed beneficiaries maintain employment, increase employment, or increase wages as a result of WIPA services? What are the current wages?
- ▶ Did beneficiaries who were considering a job offer decide to accept the offer and begin work? What was the starting wage? Current wage?
- ▶ Did the beneficiaries who were thinking about going to work connect with an employment service provider and initiate an employment plan? Did the beneficiaries assign their tickets to Employment Networks or initiate services with the state VR agency?
- ▶ Did beneficiaries assign their ticket or use any of the work incentives to achieve their employment goal?
- ▶ Are the beneficiaries eligible for employer-sponsored health insurance?
- ▶ What is the beneficiary's current status with regard to benefits?
- ▶ Does the beneficiary require additional work incentives planning and assistance?

Rewarding Quality Work--- The WIPA project's quality assurance plan can be tied to individual performance evaluations if the CWICs' work plans contain language consistent with the overall quality assurance plan. The project cannot provide premium services without high performing staff held accountable for individual achievement of quality benchmarks. WIPA managers should consider external sources of information to measure not only the overall quality of the program, but the individual quality of each CWIC. Customers, co-workers, and other partner agency personnel can be a good source of input.

Managers should consider creative yet inexpensive ways to reward staff for quality performance. Celebrate successes every one-hundredth BS&A written or when a customer calls to report that he/she has used the work incentives information to succeed in reaching an employment goal. In addition, reward a CWIC who has shown consistent quality work by giving that person additional and more challenging responsibilities. This tells the CWIC that he/she is trusted, and hard work and quality service are valued.

CONCLUSION

This unit provided a description of the quality assurance feedback loop as it applies specifically to WIPA services and offered strategies for gathering information needed to assess quality within projects. The unit also provided a discussion of techniques successful WIPA projects have used to ensure that CWICs are prepared to provide high quality services and methods for holding staff accountable for achieving outcomes. WIPA project leadership is encouraged to apply these proven strategies, but also to experiment with innovative approaches. Work incentives planning and assistance is a developing field and there is still much to be learned about how best to support beneficiaries to achieve their employment goals.

CONDUCTING INDEPENDENT RESEARCH

The Deming Cycle by Paul Arveson, (1998) – http://www.balancedscorecard.org/The_DemingCycle/tabid/112/Default.aspx

Deming Distilled: Essential Principles of TQM by A. Mead (1996) – <http://well.com/user/vamead/demingdist.html>

Built to Last: Successful Habits of Visionary Companies by James C. Collins and Jerry I. Porras, Harper Collins, N.Y. 1994

Good to Great: Why Some Companies Make the Leap...and Others Don't, Jim Collins et al, Harper Collins, N.Y. 1991

An example of a customer satisfaction survey and an organization survey are included in the next few pages.

Community Work Incentives Coordinator (CWIC) Responsibilities and Competencies

NOTE:..... The following information has been taken directly from Cooperative Agreements for Work Incentives Planning and Assistance Projects; Program Announcement No.SSA-OESP-06-1, which was published in the Federal Register Vol. 71, No. 94, Tuesday, May 16, 2006.

1. CWIC Responsibilities

The WIPA cooperative agreement awardees shall select individuals who will act as Community Work Incentives Coordinators (CWICs). The CWICs will provide work incentives planning and assistance directly to beneficiaries with disabilities to assist them in their employment efforts. CWICs will also conduct outreach efforts in collaboration with SSA's Program Manager for Recruitment and Outreach (PMRO) contractor to beneficiaries with disabilities (and their families) who are potentially eligible to participate in federal or state work incentives programs.

As part of work incentives planning and assistance, CWICs will also screen and refer beneficiaries with disabilities to the appropriate Employment Networks (ENs) based on the beneficiary's expressed needs and types of impairments. CWICs are also required to work in cooperation with SSA's Area Work Incentives Coordinators (AWICs), federal, state, local and private agencies and other nonprofit organizations that serve beneficiaries with disabilities seeking employment.

CWICs will also provide general information on the adequacy of health benefits coverage that may be offered by an employer of a beneficiary with a disability; the extent to which other health benefits coverage may be available to that beneficiary in coordination with Medicare and/or Medicaid; and the availability of protection and advocacy services for beneficiaries with disabilities and how to access such services.

2. Competencies and Credentialing

Applicants must ensure that CWICs have the skills required to competently provide work incentives planning and assistance services that assist beneficiaries in their employment efforts. WIPA awardees will be required to provide documentation to SSA that CWIC personnel meet the requirements below. SSA will use this documentation to credential CWIC personnel before they may begin providing beneficiary services.

SSA prefers that CWICs have attained a bachelor's degree in a relevant field, or possess relevant experience. CWICs may possess a combination of education and experience if the experience provides the knowledge, skills and abilities required to successfully perform the duties of the position as shown below. Former beneficiaries may substitute up to two years of full-time work for the education requirement if they can demonstrate that they used SSA work incentives to successfully gain employment.

All CWICs must demonstrate successful completion of required SSA sponsored work incentives training or shall complete said training within three months of hire.

CWICs should bring the following knowledge, skills, and abilities to the position:

- ▶ Basic math skills with an emphasis on problem solving;
- ▶ Deductive ability with analytical thinking and creative problem solving skills;

- ▶ Demonstrate competent interviewing and partnering skills;
- ▶ Demonstrated computer proficiency;
- ▶ Demonstrated ability at linking individuals with disabilities with employment opportunities;
- ▶ Ability to interpret federal, state, and local laws, regulations, and administrative code about public benefits;
- ▶ Communication skills (written and verbal);
- ▶ Knowledge of terminology used to describe certain disabilities and awareness of cultural and political issues pertaining to various populations and to various disabilities; and
- ▶ Basic computer skills.

CWICs are required to be proficient in the following knowledge, skills, and abilities:

- ▶ Social Security Disability Insurance (SSDI) and Supplemental Security Income (SSI) disability programs;
- ▶ Knowledge of SSA and other federal, state and local work incentives programs;
- ▶ Knowledge of all public benefits programs, basic operations and interrelationships among the programs, specifically in terms of their impact upon employment;
- ▶ Translating technical information for lay individuals;
- ▶ Accessing information in a variety of ways (including the ability to be able to recognize when additional information is needed);
- ▶ How to access specific Employment Network (EN) information;
- ▶ Interpersonal skills (e.g., recognize and help people manage anger and conflict, enjoy working with individuals);
- ▶ Counseling and evaluation-related skills (ability to listen, evaluate alternatives, advise on potential course of action);
- ▶ Knowledge of SSA field office structure and how to work with various SSA work incentives specialists e.g., Area Work Incentives Coordinators (AWICs), Plan to Achieve Self Support (PASS) Specialists, Work Incentives Liaisons (WILs); and
- ▶ Knowledge of ethics (e.g., confidentiality, conflict of interest);
- ▶ Ability to manage beneficiary case files and information electronically.

The applicant must clearly explain how it will ensure all individuals hired as CWICs will possess or acquire the relevant knowledge, skills and abilities. SSA may contract with separate entities to provide technical assistance and training to awardees on an ongoing basis about SSA's programs and work incentives, Medicare and Medicaid, and other federal work incentives programs.

NOTE: Due to the fact that Community Work Incentives Coordinators (CWICs) will have access to confidential beneficiary information they may be subject to SSA conducted background checks and fingerprinting in accordance with SSA personnel suitability requirements. SSA will distribute the necessary forms and consents for completion upon award.

Please complete the following evaluation of the Work Incentives Planning & Assistance services that you have received and return it in the enclosed postage paid envelope. Your input will assist us in our efforts to provide high quality customer services. Please contact _____ with any questions or concerns, or if you require additional information.

Community Work Incentives Coordinator's (CWIC) Name: _____ Date: _____

Did your Community Work Incentives Coordinator (CWIC) provide clear and understandable responses to your questions? YES NO

Did your CWIC respond in a timely manner to your request for information? YES NO

Did the CWIC provide helpful information to assist you in making a choice about employment? YES NO

Did the CWIC provide a good overview of how going to work and earnings will impact your Social Security and other benefits? YES NO

How would you rate the overall information and assistance provided by the CWIC?
 Excellent
 Very Good
 Good
 Fair
 Poor

Comments: _____

Please take the time to complete the following evaluation about the presentation on Work Incentives Planning and Assistance services. Your input will assist us in our efforts to provide quality services to you and your consumers. Should you have any questions, concerns, or require additional information, please contact _____.

Name of your Organization: _____ Date: _____

Name of the Community Work Incentives Coordinator (CWIC): _____

Darken the square that best describes your opinion for each question.

	Do Not Agree	Somewhat Agree	AGREE	Strongly Agree	Very Strongly Agree
1. The CWIC was punctual.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
2. The CWIC was organized.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
3. The CWIC was knowledgeable about your consumers' Social Security issues and needs.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
4. The CWIC presented herself/himself in a professional manner.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
5. The presentation met the expectations of my organization.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
6. I would recommend this service to other agencies or organizations.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

Please provide any additional suggestions or recommendations

