Module 5

Insuring the Provision of High Quality WIPA Services

Table of Contents

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Introduction

A clear and essential focus of the Social Security Administration (Social Security) 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.

Under the WIPA program, it is important that individual projects have strategies in place to ensure high quality training and expertise, service to beneficiaries, community outreach efforts, and data collection/reporting. Identified below are the key components of WIPA quality assurance:

Training and Expertise:

- CWICs must be trained in Social Security Benefits and work incentives, and have ample opportunity to maintain and expand that knowledge through refresher training, supplemental training and continuing education. CWICs must be knowledgeable and able to articulate information about Social Security's work incentives to Title II and SSI beneficiaries.
- CWICs must have received comprehensive training in other federal benefit programs, state-specific programs, and applicable work incentives.

Service to Beneficiaries:

CWICs must provide work incentives planning and assistance services to aid beneficiaries with disabilities in their employment efforts to retain/sustain meaningful employment and improve economic security.

- CWICs prioritize WIPA services to beneficiaries who are employed, have a current job offer, or those who have been referred by the Ticket to Work Call Center.
- CWICs are committed to providing ongoing case management, monitoring, and support of beneficiaries as they make informed decisions about employment.
- CWICs must use sound judgment and maintain the highest ethical standards in serving beneficiaries at all times. This includes, protecting personal identifying information and following Social Security's standards to safeguard information.

- WIPA projects must have established protocols to prevent conflicts of interest in serving beneficiaries.

Outreach:
- WIPA projects and CWICs must support outreach efforts (including Work Incentive Seminar Events (WISE) and collaborate with Area Work Incentive Coordinators (AWICs) on all outreach efforts.
- Projects are to provide outreach that represents no more than 10% of Social Security funding. Outreach should be targeted to transition age youth by working with schools and parents.

Information Management and Data Collection:

- CWICs must collect and report beneficiary information in the Social Security approved National WIPA Data Collection System (referred to as Efforts to Outcomes, or ETO).
- WIPA projects should ensure that a quality improvement plan is in place to:
  - Track staff performance in providing beneficiaries with timely and accurate information; and
  - Target performance goals to meet the National WIPA Benchmarks.

This module focuses on planning and implementing quality assurance activities that enable CWICs and WIPA projects to provide high quality services to beneficiaries. This includes (1) developing and implementing procedures to ensure that all information provided to beneficiaries is accurate, complete, and verified, (2) feedback from beneficiaries and partner agencies is routinely sought and used to modify the program, (3)all beneficiaries are served regardless of primary disability, primary language, or geographic location; (4) participant demographic and service data are collected and maintained; and (5) 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 Social Security 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 Social Security 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

Each WIPA project operates under a written cooperative agreement with Social Security that articulates the expectations the agency has for projects receiving funding. Compliance standards in the cooperative agreement documents include, but are not limited to, the following areas:

1. Staff training and credentialing requirements
2. Maintaining beneficiary confidentiality and privacy

Staff Training and Credentialing Requirements

Social Security 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, Social Security expects CWICs to access information about other federal or state specific programs such as Medicaid, Worker's Compensation, unemployment insurance, Temporary Assistance for Needy Families (TANF), Supplemental Nutrition Assistance Programs (SNAP), housing assistance programs, state veteran's 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 3B, there are many additional state and local rules that will vary based on beneficiary location.

In addition to building a thorough understanding of state specific programs, Social Security 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 required of CWICs. There is a clear expectation, however, that all CWICs will access additional training after achieving initial certification. SSA also expects CWICs to take advantage of technical assistance provided by the WIPA NTC and its partners.

Compliance with Social Security's Policy on Confidentiality and Privacy

WIPA projects must follow Social Security's Privacy and Confidentiality policies for maintaining records of individuals, as well as provide specific safeguards surrounding beneficiary information sharing, paper/computer records/data, and other issues potentially arising from providing work incentives planning and assistance services to SSDI and SSI beneficiaries with disabilities. Beneficiary data should be accessible only to project personnel via locked file cabinets and computer password protection.

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.

This policy applies to public reports created by the CWIC and used 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. WIPA projects are only permitted to release information that they generate such as BS&A reports, WIPs, intake interviews, or case notes. The exception is when a release specifies the entity responsible for the data.

3. Reports should include only identifying information that is absolutely necessary to provide quality services. It is recommended that WIPA projects limit 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. 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,

will not have access to beneficiary information and may not access information through the ETO data system until they successfully complete the process. Questions about specific strategies to protect information should be directed to the Social Security Office of Research, Demonstration and Employment Support (ORDES) 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.

Conclusion

WIPA projects operate under a cooperative agreement with Social Security, 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 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. 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 that 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 for which personnel must adhere.

Principle 1 – Treating Beneficiaries with Dignity and Respect

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

- **Accommodating Individual Differences** – 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 using computers, electronic mail, facsimile machines, telephones and telephone answering machines, and other electronic or computer technology. Any records maintained, whether in electronic or paper format, must be held strictly confidential with access only afforded to authorized WIPA personnel. This means that file cabinets holding paper records must be locked at all times with only authorized persons allowed

access. For electronic records, security measures must be in place to prohibit anyone other than authorized individuals from obtaining beneficiary information.

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. A tool to guide self-assessment is provided at the end of this module, entitled WIPA Service Delivery and Program Improvement Tool. CWICs should use this tool to identify areas where more training would be beneficial. The results of these self-assessment efforts should be a catalyst to 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

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.

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 may 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 essential 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 information that discourages 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 Social Security 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 stay focused on the primary recipient of your services as well as the primary objective of the WIPA initiative – supporting 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 an 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 Social Security or another agency that is responsible for deciding issues related to the beneficiary's case. Alternatively, 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 Social Security'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 Social Security'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 an 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 Social Security 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 affect 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?sitePageId=89927&orgId=nohs

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

Competency Unit 3 – Quality Assurance Strategies for WIPA Projects

Introduction

All WIPA projects should conduct a continuous review of program services and practices to determine what is working well and identify where there may be problem areas that need improvement. Assessing the project's progress toward attaining goals and objectives should occur at least quarterly. This provides the manager and CWICs an opportunity to be proactive and identify strategies necessary to improve services. The review process should also include feedback obtained from customer and stakeholder surveys, which also provide valuable information on satisfaction of services from customers.

Engaging both management and direct service staff in the development and maintenance of continuous quality assurance provides an opportunity for review and discussion of the goals and objectives and engages staff in an ongoing commitment to quality services. In addition, the WIPA should review and update the overall quality assurance plan at least annually, as new goals and objectives may be needed as CWICs gain more experience and the project makes progress. To become familiar with aspects of quality assurance activities, a tool for assessing service delivery and program improvement is provided at the end of this module. This tool allows WIPA projects and CWICs to identify a number of areas that are critical to ensuring services provided are effective, and staff are knowledgeable of the various benefit and work incentives. The tool also helps CWICs and managers plan for any needed support from the VCU Technical Assistance Liaison.

Components of a WIPA Quality Assurance Plan

In conducting quality assurance, projects must first identify the project's goals and measurable objectives and determine the actions CWICs must employ to achieve the goals. Then, the project determines its progress toward achieving the outcomes intended.

> <u>Goals</u> are broad, general statements of what the program intends to accomplish and provide a framework for determining the more specific objectives of a program. Goals developed should be consistent with the mission of WIPA and adhere to what Social Security expects of projects. A single goal may have many specific subordinate objectives. When describing program's goals, it helps to use "visionary" words such as create, develop, expand, increase, offer, promote, provide, serve, and strengthen. While there is no standard model for the goals of the quality assurance plan, there are general areas that goals should encompass related to

effectiveness of work incentive counseling services, the efficiency of service provision, and the customer satisfaction with services. Examples of goal statements may be:

- CWICs develop expert knowledge of Social Security and other federal benefit programs and can use this knowledge to provide accurate information to beneficiaries.
- The WIPA will provide prompt services to each beneficiary and continue long-term supports as required by each beneficiary at critical transition points.
- Beneficiaries served through the WIPA will make informed choices about work and transition toward self-sufficiency.

Objectives are more specific statements, defining specific steps needed to accomplish the goal. They also provide indicators to measure progress toward attaining the goal. Objectives are often stated starting with the word "To" or have action steps identified. In contrast to the programs goals, objectives are tangible, specific, concrete, and - most importantly - measurable. When developing specific objectives it is important to be realistic, ensuring they are achievable in a specified time frame and that the project will be able to demonstrate whether or objectives were achieved. Examples of objectives might be:

- To ensure each CWIC participates in at least four supplemental trainings annually.
- Each CWIC will complete training in Other Federal Benefits, Self Employment, Developing BS&As and WIPs.
- All new referrals are contacted within one business day from receipt of referral.
- To complete baseline assessments within 4 weeks following beneficiary enrollment in WIPA services.
- To ensure 75 percent of beneficiaries who are working or have a job offer are engaged in services and receive follow-up assistance
- To ensure 90 percent of beneficiaries served express they are satisfied with services provided by CWICs.

Outcomes are the actual results that occur through achieving the objectives. Outcomes are quantifiable and measurable and show the progress the project is making. For example, outcomes based on the objectives may indicate:

- Two of the three CWICs have completed the web course on Other Federal and State benefit programs, One CWIC will register and attend the next course when offered in 2014.
- Each CWIC and the program manager participated in the Developing BS&A teleconference.
- 98 percent of the new referrals were contacted within one business day of receipt of referral.
- Of WIPA enrolled beneficiaries, 90 percent of these beneficiaries had a BS&A completed within six weeks of enrollment.
- 78 percent of beneficiaries expressed satisfaction with services.

For each objective, 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 specific objectives and reporting the outcomes.

Processes Leading to Outcomes

In developing goals and objectives, it is important to understand what processes are needed to achieve the objectives of the program. Processes are actions that WIPA staff must undertake, and indicate that CWICs are providing quality services. These processes will drive the formation of the objectives included in the Quality Assurance Plan.

While there may be variances among projects, processes need to cover four main areas of quality assurance relevant to WIPA services – **accuracy** and **thoroughness (effectiveness), timeliness (efficiency)** and **customer satisfaction**. Projects should identify at least three processes each category, quantify with measurable objectives and then evaluate for outcomes. Examples of processes that lead to quality outcomes 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 and thoroughness before they are sent to the customer, such as managers or senior CWICs;
- All CWICs send at least one BS&A per quarter to the Technical Assistance 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, Supplemental Nutrition Assistance handbook, etc., to obtain information on policies, and discuss findings with coworkers;
- 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, or a technical expert in the local Social Security field office. Contacts are established with 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;
- CWICs conduct thorough intakes that include the beneficiary's earnings and employment goals, all federal and state benefits received, health insurance benefits, other benefit issues and employment services and supports needed;
- CWICs verify all benefits (Social Security, and other federal, state, and local benefit programs) before providing benefits analysis and advisement.
- BS&As are written to address the customer's issues and concerns and are comprehensive and individualized to the customer's specific benefit profile, employment and earnings goals;
- CWICs present information in a manner that is accessible and usable by the beneficiary.
- CWICS support the beneficiary in using the information provided to advocate on his/her behalf.
- CWICs develop WIPs to guide beneficiaries through the action steps needed to accomplish their benefits and employment goals.
- CWICs provide follow-up contacts with beneficiaries after the completion of the WIP to assess progress in completing WIP action steps.
- CWICs contact beneficiaries at critical transition points to update BS&As or WIPs.
- All contacts between a customer and a CWIC are logged in the Efforts to Outcomes (ETO) database, 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.
- Direct supervision is provided on a weekly basis to review cases and set timelines for completion of services for each beneficiary.
- New referrals are contacted within 24 to 48 hours to schedule an initial meeting.
- Within six weeks of enrollment in WIPA, BS&As are mailed/discussed with a beneficiary.
- BS&A reports are completed and reviewed with beneficiaries within one week of receiving the BPQY and all other verifying information.

Customer Satisfaction

When beneficiaries and other stakeholders are receiving the services they need, there will also be indicators of customer satisfaction. Some examples of these indicators include:

- 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.

Developing the Quality Assurance Plan

WIPA projects should have a Quality Assurance Plan in place to track staff performance in providing beneficiaries with timely and accurate information. Developing the quality assurance plan should include thoughtful consideration to include goals encompassing accurate, thorough, and timely information that helps beneficiaries to achieve their goals toward financial stability. Below are several key points to remember in formulating the plan.

1. Define the Scope of the Plan:

When developing a Quality Assurance Plan, it is first necessary to identify the various areas to be addressed by the plan, such as staff qualifications, confidentiality, data collection, and customer satisfaction. Then the project should identify other goals and objectives for the program that will enhance services. Projects are cautioned to start slow and to limit the number of objectives by which they measure performance. If too many objectives are selected at once, the plan will be overly complicated and too time consuming to carry out. Start with a few goals, then develop two to three key objectives for each goal, and invest time in developing a thoughtful (and doable) plan for measuring actual performance against the objective. Choose objectives 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. Expect to have to "tweak" the evaluation process and learn lessons over time.

2. Involve the Entire Team in Planning

Strategize as a team to develop a functional assessment plan. Everyone should be clear on project objectives 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. Do not overcomplicate the measurement process. CWICs are very busy with many responsibilities. To the extent that the quality assurance plan adds extensive administrative work, it risks not being completed at all, or otherwise being done haphazardly. Involve the CWICs in the planning process to determine the most efficient manner for measurement to occur.

Focus not on measuring processes, but rather, measure the positive outcome of the processes. 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.

3. Consult with Others for Assistance

If an objective seems hard to measure, get help. WIPA NTC staff may assist with brainstorming on unique ways to measure achievement of a particular objective and can share ideas gleaned from other projects.
Use WIPA colleagues to identify meaningful outcomes. Ask, 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.

4. Evaluate for Outcomes, Develop Strategies for Improvement, and Revise the Plan

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. When the project is not achieving the outcomes desired, it is the perfect opportunity to explore the root of the problem, consult with the VCU Technical Assistance Liaison or the Project Officer, and formulate new strategies to reach the goals. However, when an objective is met, raise the bar instead of accepting status quo. Think about how to improve services constantly. If a particular area has been focused on extensively and improvements have been made, try working on another area.

Sample WIPA Quality Assurance Plan

Below is a sample of a WIPA Quality Assurance Plan indicative of a WIPA project that has experience measuring quality based on the number of objectives. A project with less experience might want to start with fewer objectives and increase the objectives over time.

Goal: CWICs develop expert knowledge of Social Security and other federal benefit programs and can use this knowledge to provide accurate information to beneficiaries.					
Objectives	**Measured by**	**Responsibility**	**Timeline for Review**	**Status (Outcome)**	**Strategies for Improvement**
1. All CWICs will achieve full certification by the end of 2014	1. Notification of fully certified CWIC status from VCU	1. CWICs complete requirements for BS&A submissions to Technical Assistance Liaisons	1. Quarterly review of progress		
2. CWICs will participate in supplemental trainings at least 4 times per year. This includes webinars, teleconferences, and web courses. Trainings include: Other Federal Benefits, Self- Employment, Developing BS&As and WIPs, and other trainings identified by CWICs	2. Identification of course completion by VCU-NTC. Documentation to be maintained in personnel file.	2. CWICs report completion of trainings. Manager and supervisor to monitor continuing education.	2. Quarterly review of CWIC training plan.		

Goal: All beneficiaries served through the WIPA will receive prompt, timely services.					
Objectives	**Measured by**	**Responsibility**	**Timeline for Review**	**Status (outcome)**	**Strategies for Improvement**
1. CWICs will contact 100 % of new referrals within 1 business day of referral	1. Project data reports and beneficiary tracking	1. Manager to evaluate data	1. Monthly		

2. 80 % of beneficiaries receiving BS&As will have these completed within 6 weeks of enrollment in services	2. Project data reports and beneficiary tracking	2. Manager to evaluate data	2. Quarterly		
3. 80% of beneficiaries receiving WIPs will have these completed within 8 weeks of enrollment in services	3. Project data reports and beneficiary tracking	3. Manager to evaluate data	3. Quarterly		
4. 100% of requests for verification of benefits and entitlements occurs within 1 week of enrollment in services.	4. Review of records and documentation	4. CWICs to document timelines. If timelines are not met, reason is stated in record. Supervisor or manager to review in weekly supervision	4. Monthly audit of records		

Goal: Beneficiaries enrolled in WIPA services are supported through ongoing case management and at critical transition points.

Objectives	Measured by	Responsibility	Timeline for Review	Status (outcome)	Strategies for Improvement
1. WIPA enrolled beneficiaries will have an average of five follow-up contacts.	1. Project data reports and beneficiary tracking	1. CWICs to record follow-up contacts and initiate contacts as indicated in plans. Manager/supervisor to review data.	1. Quarterly review		

2. Beneficiaries are contacted for follow-up and update of BS&A and/or WIP at their individual benefits transition points.	2. Project data reports and beneficiary tracking	2. CWICs to maintain calendar of critical transition points for beneficiaries Manger/supervisor to review follow-up contacts with CWICs in individual supervision meetings	2. Monthly review		

Goal: Benefits Summary and Analysis and Work Incentives Plans are of highest quality, addressing the individual needs of the beneficiary

Objectives	Measured by	Responsibility	Timeline for Review	Status (outcome)	Strategies for Improvement
1. 100% of BS&As and WIPS will be reviewed for accuracy, clarity, and thoroughness.	1. Tracking of BS&As &WIPs developed and BS&As &WIPs reviewed	1. CWICs, supervisor/manager track review process	1. Weekly as BS&As and WIPs are developed		
2. 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.	2. Review of verification of benefit status, review of BS&As	1. CWICS, supervisor/manager track review process	1. Weekly as BS&As and WIPs are developed		

Goal: Beneficiaries receiving Work Incentives Counseling Services will progress along the

employment continuum to achieve their individual employment and earnings goals					
Objectives	**Measured by**	**Responsibility**	**Timeline for Review**	**Status (outcome)**	**Strategies for Improvement**
1. Increase the number of beneficiaries earning above the Trial Work Threshold; increase the number of beneficiaries earning above the SGA threshold.	1. Project data reports on earnings records	1. Manager review of project data	2. Quarterly review		
2. Ensure beneficiaries are utilizing work incentives applicable to their individual situation.	2. Project data reports on work incentives suggested and work incentives used	2. Manager review of project data	2. Quarterly review		
Goal: Customers will express satisfaction with services					
Objectives	**Measured by**	**Responsibility**	**Timeline for Review**	**Status (outcome)**	**Strategies for Improvement**
1. 90% of beneficiaries and or family members responding will express satisfaction with services	1. Satisfaction data	1. Manager to distribute and collect satisfaction surveys	1. Quarterly review		
2. Other stakeholders and referral sources (Vocational Rehabilitation,	2. Satisfaction data	2. Manger to distribute and collect satisfaction surveys	2. Quarterly review		

Employment Networks, Employment Service Programs) will express satisfaction with services provided to beneficiaries					

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

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

Non-Profit Capital Management: Goals, Objectives and Outcomes - http://www.npcm.com/Resources/GoalsObjectivesOutcomes/tabid/60/Default.aspx

Competency Unit 4 – Continuous Quality Assurance for WIPA Projects

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 funders and 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 project must use the data gathered 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, the project will identify new quality improvement goals 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 to use in the plan, as well as the timeframes for accomplishing the work. 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. At the end of this module is a tool for WIPA service delivery and program improvement that will help WIPA staff and project leadership identify areas that the project wants to address. Using this tool is one method of gathering information from the perspective of the internal stakeholders. Other methods focus on "external" stakeholders, which include beneficiaries, their family members, community partner agencies, referral sources, and Social Security. 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 CWICs present cases to the team 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 is 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 Technical Assistance Liaison perform an occasional "mock evaluation" to identify areas that need improvement. Another strategy employed by WIPA projects is asking the Technical Assistance 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 along with the BPQY and intake information gathered and asking for feedback is an excellent way to sharpen advisement skills. The Technical Assistance 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. Technical Assistance 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 Social Security.

QUALITY ASSURANCE TIP: Asking for feedback on written work from the NTC Technical Assistance Liaison is a 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 affect timeliness; though some WIPAs still report delays in receiving the BPQY from the local Social Security 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 Social Security

Social Security 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 Social Security's Cooperative Agreement monitoring requirements. During the site visit, Social Security personnel will meet with the agency executive director, WIPA Project Manager and other project staff that the director deems necessary. During this meeting, Social Security 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 – Social Security will review outreach activity and assess effectiveness of outreach methods.

2. Case File Review – Social Security will randomly review WIPA case files to ensure proper data is being maintained.

3. Security of Files – Social Security will ensure that the files are secure.

4. Staff Responsibility – Social Security will review the organizational chart and job functions.

5. Staff Certification – Social Security will insure that WIPA personnel have been trained and certified.

6. Personnel/Recruitment Issues – Social Security 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 Social Security 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, Social Security will oversee this inventory. At the time of this writing, Social Security defines equipment as items costing more than $5,000.

9. Collaborative Relationship with Other Agencies – Social Security 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 Social Security, 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, assigned project may assign a lead CWIC 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, Social Security expects WIPA projects to provide services using qualified personnel who have received comprehensive training in Social Security 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 convey complex information in a foreign language accurately, both 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. All WIPA personnel should review this list to make certain there is a clear understanding of Social Security 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. To ensure that a CWIC develops competency, a manager should use several approaches.

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 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. Conducting 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 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 Technical Assistance Liaison to work closely with that person until ready to function independently. The TA 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 programs are required to enter beneficiary and service data in the WIPA National Data System known as Efforts to Outcomes, or ETO. Within ETO, WIPA managers have access to reports to monitor the work of staff. Using the data and reports in ETO will help to ensure services are provided in a timely manner and are responsive to the needs of WIPA customers.

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 Social Security;
- 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 ETO system and reports, as well as customer/stakeholder surveys to share and discuss favorable responses or need for improvement with staff on a regular schedule.

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, as well as need for other services/supports. 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 also 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 provide recognition 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

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

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

1. CWIC Responsibilities

WIPA CWICs provide work incentives planning and assistance directly to beneficiaries with disabilities to assist them in their employment efforts. CWICs also support community outreach efforts including Work Incentive Seminar Events sponsored by Social Security's Beneficiary Access and Support Services (BASS) contractor, for 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 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 Social Security's Area Work Incentives Coordinators (AWICs), federal, state, local, and private agencies and other nonprofit organizations that serve beneficiaries with disabilities seeking employment.

CWICs 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. CWICs may also provide information on the availability of protection and advocacy services for beneficiaries with disabilities, and education on how beneficiaries may access these services.

2. Competencies and Credentialing

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

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

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 Social Security 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 Social Security field office structure and how to work with various Social Security 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. Social Security may contract with separate entities to provide technical assistance and training to awardees on an ongoing basis about Social Security's programs and work incentives, Medicare and Medicaid, and other federal work incentives programs.

NOTE: Due to the fact that CWICs will have access to confidential beneficiary information, they will be subject to Social Security conducted background checks and fingerprinting in accordance with Social Security personnel suitability requirements. Social Security will distribute the necessary forms and consents for completion upon award.

Work Incentives Planning & Assistance (WIPA)

Customer Satisfaction Survey

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:

Work Incentives Planning & Assistance (WIPA)

Organization Survey

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.	☐	☐	☐	☐	☐
2. The CWIC was organized.	☐	☐	☐	☐	☐
3. The CWIC was knowledgeable about your consumers' Social Security issues and needs.	☐	☐	☐	☐	☐
4. The CWIC presented herself/himself in a professional manner.	☐	☐	☐	☐	☐
5. The presentation met the expectations of my organization.	☐	☐	☐	☐	☐
6. I would recommend this service to other agencies or organizations.	☐	☐	☐	☐	☐

Please provide any additional suggestions or recommendations:

WIPA Service Delivery and Program Improvement Tool

Purpose: The purpose of the WIPA Service Delivery and Program Improvement Tool may be used to guide the project to develop a unique, formalized plan to address areas for program improvement.

Process: CWICs and WIPA projects may use this tool to assess their project's performance, and the CWICs knowledge and skill in serving beneficiaries. This self-assessment tool also serves as a starting point for a joint discussion between the Technical Assistance Liaison and the project regarding areas of strengths and areas needing improvement.

Use of this Document: This assessment is a tool, intended to provide WIPA project managers a way to assess the level of skill of CWICS. Think about each bullet point and determine how your WIPA project and the CWICs perform in each area. Identify if technical assistance is needed and what supports may be useful for your project. You may add comments or questions to indicate specific staff that would benefit from additional support.

		Technical Assistance Preferred/Needed ☑	Questions or comments for discussion:
Objective:	**Key aspects to consider:** *Data sources: Interview with project manager, review of documentation in case records, and ETO database*		
To ensure that WIPA projects implement rigorous quality assurance procedures and projects measure the accuracy and relevance of materials provided to beneficiaries.	Staff Development: • The project has clear, comprehensive job descriptions that describe the expected values, skills, qualifications, and competencies. • The project has a staff recruitment and retention process that promotes hiring and staff retention. • The project has a thorough, structured orientation process for all new CWICs that includes orientation to the overall agency; values/mission; introduction to employment services, the WIPA program, referral sources, time management, data entry, and other critical elements of the CWIC scope of work. • Managers provide follow-up to orientation through on-site support and mentoring by supervisor and/or experienced CWICs. A project manager or supervisor is knowledgeable about work incentives and is able to assist CWICs when needed. • CWICs are encouraged to participate in ongoing training, and use the array of technical support resources (online resources, WIPA Project networking options, Social Security, WIPA National Training Center and supplemental trainings, or other local or state resources) in order to enhance professional skills and improve the quality of WIPA services.		

Ensuring the Provision of High Quality Work Incentives Planning and Assistance (WIPA) Services
(Quality Assurance and Program Evaluation Activities)

	Monitoring Quality and Productivity:		
	• The WIPA uses quality assurance and performance processes to assess key aspects of the WIPA project.		
	• A feedback loop (such as the plan-do-check-act) cycle is used to continually assess and improve performance.		
	• The project uses data on individual outcomes, staff productivity, customer satisfaction, and cost efficiency for strategic planning to improve service quality.		
	• The WIPA and CWICs have a procedure in place to obtain feedback from both beneficiaries and partner agencies and the feedback obtained is used to improve service delivery.		
	• Data Collection, internal reports, and ETO are used to evaluate and improve service delivery.		
	• Procedures (such as improved systems and practices, training or other activities) are implemented to improve service quality based on WIPA project evaluation and feedback from customers.		
	• Staff productivity is evaluated according to benchmarks set for the project, including assessment time from referral to completion of the BS&A and WIP.		
	• Case files and ETO data are reviewed to ensure follow up with beneficiaries occurs at regular intervals and supports beneficiaries' efforts along the employment continuum and efforts toward self-sufficiency.		
	• Procedures are in place to ensure that all information provided to beneficiaries is individualized, accurate, and complete.		
	• If sub-contractors are used, performance of sub-contractual		

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staff is included in monitoring and oversight.

Outreach and Referral Process:

- The project has an outreach plan and referral process that is understood by CWICs and staff.
- The project has a current marketing plan, and uses marketing materials and approaches that promote a positive and professional image (including Information and Referral packets, marketing to other stakeholders, and follow-up planning).
- The referral criteria and procedures are clear and understood by partner agencies.
- The project strives to ensure all beneficiaries in their catchment areas are represented in their service population, regardless of age, type of disability, primary language, or geographic location of residence.
- Outreach activities are conducted in collaboration with the local Social Security staff, VR, ENs and other community partners.
- Measures have been developed for the project (for example, number of education and outreach contacts, number of agencies referring beneficiaries for services, beneficiaries requesting services following outreach events).
- The Project tracks outreach activities and correlates results of the outreach with the success in generating new referrals.

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Providing Effective Work Incentives Planning and Assistance Services			
Objective:	**Key Aspects to Consider:** *Data sources: Interview with project manager, interviews with CWICs, review of documentation, case files, and ETO data.*	**Technical Assistance Preferred/Needed** ☑	**Questions or comments for discussion:**
To ensure that CWICs are highly competent in understanding the intricacies of Social Security benefits, other Federal benefit programs and associated work incentives, and apply this information accurately in their work with beneficiaries and other concerned parties.	CWIC Duties and Rolls: • CWICs deliver services customized to meet the needs of beneficiaries at the contemplative, preparatory, job search, and employment stages of the employment continuum. • CWICs understand the stages of the employment continuum (contemplative stage, preparatory stage, job search stage, employment stage) and use this information to customize counseling services for beneficiaries. • CWICs understand how work incentives may be used to help beneficiaries achieve an employment goal. CWICs provide information that addresses the earnings and employment goal. Developing Referral Sources and Conducting Outreach: • CWICs are knowledgeable about the full array of vocational services available through vocational rehabilitation, workforce development, community employment programs, Employment Networks and other services. • CWICs are familiar with local services and supports and refer beneficiaries routinely to services needed for beneficiaries to be successful in employment. Information on work incentives is provided to those involved with the beneficiary's services and supports with the beneficiary's consent. • Outreach strategies are designed to increase WIPA service delivery to traditionally underserved populations (e.g., transition-age		

	youth with disabilities, veterans with disabilities, Native Americans, etc.).	
	• The project collaborates with agencies / organizations in the asset building community (AFIA grantees, State IDAs, etc.) to promote the successful participation of beneficiaries in Individual Development Account and other forms of financial literacy.	
	• CWICs work collaboratively with the BASS and WIIRC to ensure referrals are handled in a timely and efficient manner.	
	• Outreach trainings are successful in promoting beneficiary interest in employment and use of work incentives.	
	Collaborative Relationships:	
	• CWICs adhere to the highest standard of ethical and professional behavior and conduct in the provision of planning and counseling services with beneficiaries and other partners.	
	• CWICs have effective strategies for interacting with Social Security Field Office personnel and Area Work Incentives Coordinators in WIPA service delivery are evident by CWICs.	
	• CWICs employ specific strategies to communicate effectively with other members of the beneficiary's employment support team to make sure that all parties are working together towards employment.	
	Beneficiary Intake and Conducting Client Interviews:	
	• CWICs are able to identify eligible beneficiaries and prioritize initial contacts.	
	• CWICs conduct initial intake interviews that are sufficient to capture information regarding employment goals for the beneficiary, federal and state benefits, healthcare, work incentives used or projected, financial independence, and other supports needed.	
	Verifying Benefits and Developing Past Work:	
	• CWICs are able to analyze the BPQY to determine cash benefits received, use of various work incentives, and past and current	

income received and accurately interpret this information for the beneficiary. • Other state and federal benefits are verified (including Medicare Part D, Medicaid, SNAP, Housing, VA benefits, Workers Comp Unemployment Insurance) and other state or local assistance. • CWICs are able to identify when past work activity need to be developed through the use of SSA-821 or SSA 820 or other means. Developing BS&As and WIPs: • BS&As are written for at least 60% of the beneficiaries enrolled in WIPA services. • 80% of BS&As are developed within 7 weeks of enrollment into WIPA services • Benefit Summary & Analyses and Work Incentives plans are individualized to the beneficiary and do not simply provide generic information. • CWICs correctly describe appropriate work incentives (IRWE, BWE, SEIE, Subsidies, PASS, EXR, etc.) that are pertinent to the beneficiary. • CWICs provide a variety of scenarios that show how employment may offset dependence on public benefits. • All benefits received and verified are included in the Benefits Summary and Analysis. • WIPs are developed with measurable, attainable action steps that reflect key aspects of the use of work incentives and other services and supports needed to succeed in employment and address benefit supports needed. Service Delivery: • Ongoing work incentive counseling is provided at critical transition points and follow-up is offered at regular intervals. • CWICs facilitate the use of necessary work incentives (IRWE, BWE, SEIE, Subsidies, PASS, EXR, etc.) at each stage of the employment process, which supports the achievement of employment goals and objectives.	

	• Proactive, ongoing WIPA services are provided as a collaborative member of each beneficiary's employment support team to facilitate achievement of paid employment, supports employment retention over time, and fosters future career advancement. • CWICs provide services that demonstrate effective accommodations for persons with disabilities, as well as services that demonstrate linguistic and cultural sensitivity and competence. • CWICs have basic skill in active listening, observation, discovering and exploring to effectively communicate and support the diverse needs of beneficiaries served. • CWICs check to ensure written correspondence is accurate and free of technical/typographical errors. • CWICs have a solid understanding of the Ticket to Work Program and the regulations affecting beneficiaries and use this information to counsel beneficiaries in effectively using the Ticket. • CWICs acquire a complete understanding of Social Security disability programs and other Federal public benefits, their various eligibility requirements, their operational • CWICs demonstrate the knowledge of effective counseling and advisement strategies to support beneficiaries in understanding options and making informed health care coverage choices throughout the employment process. • CWICs are able to describe how paid work will affect government-sponsored health insurance such as Medicare and Medicaid accurately, and have general knowledge of employer-sponsored health insurance to support beneficiaries in the selection of healthcare options. Research Skills: • CWICs conduct work incentives research including efficient use of the Social Security POMS system, locating regulatory citations for other public benefit programs online, and correctly interpreting the intent and application of complex regulations, rules, policies, and programmatic procedures. • CWICs demonstrate strong problem solving		

	skills, and apply work incentives creatively to promote employment outcomes. • CWICs analyze the Benefits Planning Query and other information, and interpret this information accurately when advising beneficiaries.		

Understanding Social Security Disability Benefits, Other Federal Benefits, Healthcare and Associated Work Incentives

Objective:	Key Aspects to Consider: *Data sources: Interview with project manager, interviews with CWICs, review of documentation*	Technical Assistance **Preferred/Needed** ☑	Questions or comments for discussion:

To communicate accurate information about work incentives and federal and state benefits to help alleviate beneficiary concerns that paid employment will cause loss of critical cash benefits and health insurance.	Knowledge of Social Security Programs:
	
	(Please check specific areas where technical assistance and training may be needed):
	Social Security Programs (Title II)
	    • Overview of SSA
	    • Disability Determination
	    • Application and Appeals Process
	    • SSDI Work Incentives (Trial Work Period and Extended Period of Eligibility)
	    • Subsidy and Special Conditions
	    • Impairment Related Work Expense for SSDI
	    • Self Employment and SSDI Work Incentives
	
	Social Security Programs (Title XVI--SSI)
	
	    • SSI income exclusions (general income exclusion, earned income exclusion
	    • In-Kind Support and maintenance
	    • Deeming		

	• Student Earned Income Exclusion • Sections 1619a and 1619b • Impairment-Related Work Expense for SSI • Blind Work Expense • Plan to Achieve Self Support • Self-Employment and SSI Work Incentives • Transition from Disability Benefits to Retirement **Other Social Security programs or provisions** • Expedited Reinstatement of Benefits • Section 301 • Overpayments/Underpayments Knowledge of Healthcare Programs: *(Please check specific areas where technical assistance and training may be needed)*: • Medicare A, B, C/D • Extended Period of Medicare Coverage • Medicaid and State Health Insurance Programs • Medicaid Buy-In • Spend-down programs • State Health Insurance Information Program • Medicaid services and programs offered within the State Plan • Medicare Savings Program • Low Income Subsidy • Other health insurance programs, (including employer-sponsored health insurance plans) to support beneficiaries to make functional cost-benefit analyses, which are affordable and meet the individual healthcare needs. Knowledge of other State and Federal Benefit Programs: *(Please check specific areas where technical assistance and training may be needed)*: **Other State and Federal Benefit Programs**		

• HUD and Federal Subsidized Housing programs • Special Needs Trusts • Earned Income Tax Credit • Temporary Assistance for Needy Families (TANF) • Food Stamps • Unemployment and workers compensation • Family and Self Sufficiency Programs • Individual Development Accounts • Asset Development and Economic Independence • Ticket to Work and Work Incentives Improvement Act • Veteran's benefits • Individual Development Accounts to achieve self-sufficiency goals		

Basic Proficiency - At one end of the competency continuum are beginning level CWICs who have completed initial WIPA training and certification and have less than one year of experience providing WIPA services in the field. These individuals are novices at conducting independent research and have limited experience in the use of work incentives. They tend to be weakest in the areas of healthcare or other Federal benefit programs. CWICs with basic proficiency typically are beginning to form collaborative relationships with community partners and may have a weaker grasp of the employment services for individuals with disabilities.	Intermediate Proficiency - Toward the middle of the continuum are those with intermediate CWIC skill levels. These individuals have completed certification, have provided WIPA services for at least 12 months, have completed supplemental trainings, and have accessed technical assistance. Individuals at this level have a moderate level of skill in the use of work incentives, providing counseling on healthcare issues, and in understanding the other Federal benefit programs. Intermediate level CWICs are aware of the full-array of employment services and supports available in their community and have established collaborative working relationships with key community partners	Advanced Proficiency - At the far end of the continuum are the fully proficient CWICs. These individuals have five or more years of experience providing work incentives counseling, are proficient at conducting independent research, and have a solid understanding of the most complex work incentives issues. They tend to be individuals who avail themselves of all training opportunities and have accessed technical assistance many times. They are highly experienced in the use of work incentives, and they have developed an understanding of State specific health insurance issues. These professionals have a solid understanding of how employment affects the

		other Federal benefits programs. They have developed collaborative relationship with all key community partner agencies – including Social Security. CWICs with advanced proficiency are also skilled at conducting outreach and providing services to underserved populations. In some projects, a CWIC with advanced proficiency may be designated as "Lead CWIC" or Senior CWIC."