WIPA FAQ #5

(Questions 103-145)

March 19, 2015

103. Question: Can Social Security provide guidance about the abstract for our application?

Response: Yes.

The abstract should provide a brief summary of your project including how you propose to manage and operate a WIPA. It should be the first part of your application package. We do not provide a form specifically for the Project Abstract, so you may use a form called "Other Attachments" when you upload the abstract document you created. The abstract should be no more than two pages. See page 25 of the Request for Application (RFA) for the complete list of requirements and attachments.

104. Question: We are wondering if we should include any mileage or other travel expenses to distant territories in our budget. We are very flexible, and will do whatever is needed to meet the needs of beneficiaries. But it would be unfortunate to be graded lower if we misunderstand the expectations and budget too much or too little to maintain any physical presence in the territory we propose to cover.

Response:

All budgets are unique to the individual project and the organization's specific plan to serve the beneficiaries in the service area. Therefore, we cannot advise you on the specifics of your budget. Think about your plan, how best to accomplish your approach and the best way to serve the beneficiaries in the proposed service area. You may want to consider budgeting for minimal travel expenses to more remote areas to ensure that should the need arise; you have the funds you need. We understand that budgets are a "best estimate" and that a grantee may need to revise their budget at different times during the life of the project. Remember, if you are selected, budgeted funds of no more than 25 percent of the award or $25,000, (whichever is less) may be moved from one line item to another without prior approval from Social Security.

105. **Question:** We serve a very rural area with high unemployment and low socio-economic status. Many of the people in our area have poor or nonexistent computer access. We plan to budget for travel to areas that are especially hard to reach. We understand that Social Security wishes current grantees to provide services remotely. Will this travel budget affect our ability to be funded?

Response:

Any decisions you make as to budget need to be justified in the budget narrative. Keep in mind, though, that even many areas without wireless internet access have landline phones and traditional mail.

106. **Question:** Can we budget for travel to conferences, for example, to the National Association of Benefits and Work Incentives Specialists (NABWIS) conference?

Response:

We do allow reasonable costs for travel to conferences that are germane to a CWIC's role. You should justify these expenses in your budget narrative.

107. **Question:** Can our agency use one login on grants.gov or does each person need their own login?

Response:

Every applicant organization needs to be registered with the System for Award Management (SAM) at SAM.gov. There are multiple roles included in the SAM registration. One role is the Electronic business Point of Contact (E-biz POC) and the other necessary role for submitting applications is the Authorized Organization Representative (AOR). The E-biz-POC completes the SAM registration, and approves individuals as Authorized Organization Representatives (AOR) for their organization. Multiple individuals including AORs may work on preparing the application outside of grants.gov, but only one AOR may log in and complete the electronic forms, sign and submit the application. If you require more information about the SAM.gov registration and the AOR and E-biz POC roles, please go to www.sam.gov.

108. **Question:** Can two people work simultaneously on the same application within Grants.gov under separate logins?

Response: No.

Applicants cannot work on applications simultaneously within Grants.gov, and only one AOR may submit the application for an organization.

109. **Question:** We read that each program must use a laptop for WIPA reporting. Should this laptop be included in the budget? And if so, how much?

Response: No.

Social Security will issue laptops to awardees at no cost to the WIPA.

110. **Question:** We plan to use some state general funds to meet our match. Do we need to include that in the budget narrative? Or should we just make sure it is listed in the non-federal column and in non-federal resources?

Response:

A complete budget narrative should include an explanation for how the applicant will meet the non-federal match, and it can be broken down in the narrative with estimated dollar amounts for each corresponding budget category. Just be reasonable and clear in your budget

111. **Question:** We have been involved with several pilot and research programs through the years, including the Benefit Offset National Demonstration. The people most familiar with our performance are the Social Security Project Officers with whom we worked. May we use them as a reference?

Response: No.

Please explain your experience in the programs that you feel offer support to your WIPA application. If we need confirmation from internal Social Security staff, we will request it ourselves.

112. Question: We are a state VR agency and a WIPA project. May we use Social Security ticket reimbursements as matching funds?

Response: No.

Matching funds must be from a non Federal source. See page 24 of the RFA

> "Recipients of a cooperative agreement are required to contribute a non-Federal match of at least five percent toward the total approved cost of each award. The total approved cost of the project is the sum of the Federal share (maximum of 95 percent) and the non-Federal share (minimum of 5 percent). The non-Federal share may be cash or in-kind (property or services) contributions. Applicants may not use other Federal funds to account for the matching funds or services."

To identify what the Total Project Costs are, see the example below:

Step 1: Calculate the Total Project Costs (TPC): Federal Funds ÷ 0.95 = TPC, for example: $100,000 ÷ 0.95 = $105,263 (TPC)

Step 2: Calculate Cost Share: TPC – Total Federal Funds = Minimum 5% Cost Share, for example: $105,263 - $100,000 = $5,263

113. Question: I'm trying to work up my budget for the RFA. I am using the majority of the amount requested to fund CWICs based in various parts of the state. I am moving another staff person to manage the centralized intake function. Can I charge 30% of her salary to the WIPA grant even though she will be doing intake for our VR sponsored CWICs too? I am wondering about the 15% I&R restriction. The main reason I was going to fund the I&R intake fully was to ensure that 100% of CWIC time in the field was for direct service. But if she is 30% charged to SSA, does that mean that 15% of her time can only be on I&R or is it 15% of the 30%? Does that make sense?

Response:

The 15% Information and Referral (I&R) limitation applies to the work effort of the entire WIPA project, not just the work of one individual.

114. Question: Which of our WIPA staff, if we are awarded, must have suitability?

Response:

All staff listed on the Personnel form as part of WIPA must request and receive level 5 suitability as soon as possible after the award. This includes all WIPA staff, including the Authorized Organization Representative (AOR) posting the application to Grants.gov, even if that person has no other duties with the WIPA project. If staff already has level 5 suitability from a prior WIPA project, we may be able to transfer that suitability to the new award. We will not accept level 1 suitability in lieu of level 5 suitability. This is a very important requirement and there are no exceptions.

115. Question: Is it allowable to have a project advisory committee to review performance information and also to provide input on the program?

Response: Yes.

Provided that any associated costs are reasonable and do not impair the effectiveness or efficiency of WIPA services, and provided that you do not share beneficiary Personally Identifiable information (PII) with them.

116. Question: In some States the service areas are different than how they were funded in the past. How is Social Security planning to handle contact with beneficiaries that were already receiving services from a WIPA that are in a locality that you previously didn't serve? Will we have access to data in ETO and information on services the beneficiary already received or will we start over from the beginning? Will ETO start over from scratch or will we have access to information on beneficiaries served by a different WIPA?

Response:

We intend to transfer appropriate beneficiary information from the former WIPA to any new awardee that serves a specific area. We will provide further guidance after August 1, 2015 when we know how the service areas will change. We will respond to the other questions about notice to the beneficiaries involved later.

117. **Question:** Regarding website requirements: There is a requirement for "Creating websites and other electronic information and communication options that comply with Section 508 of the Rehabilitation Act." Does the website need to be independent of our organization's regular website, or can it be a component of our website?

Response:

It may be a component of your organization's website, but it should clearly describe the services you provide as a WIPA, and must meet Section 508 accessibility requirements.

118. **Question:** If we receive an award, how many laptops will we receive? For example, is there a guideline that each WIPA project gets one laptop for every X number of people in the state?

Response:

We will make every effort to provide a sufficient number of laptops to all projects based on requests and within the limits of the inventory we have. We do not have enough information at this time to respond to your question. We will provide additional guidance.

119. **Question:** Can tablets be used for in-the-field note taking?

Response:

You may only use Social Security approved and furnished systems specifically, the laptops we will provide.

120. **Question:** Our projects that demonstrate our ability to provide WIPA service would primarily be our 15 years of WIPA and BPAO services. Whom should we put for a reference?

Response:

If your organization has partners in the community that have experience with your services, you should list these entities.

121. **Question:** We also provide Day Services, Behavioral Support, Independent Living, and Supported Employment services for individuals with developmental disabilities. Would this be one project or four?

Response:

You must decide how you wish to indicate the other programs your organization operates in addition to WIPA. Please remember, though, that the reviewers will be most interested in the areas of service that augment or intersect with your benefits counseling experience.

122. **Question:** Do you want us to list all of our successful grants, even if they are not specifically linked to WIPA but demonstrate our long and successful grant history?

Response:

You should emphasize prior funding that reflects your organization's ability to provide WIPA-like services effectively.

123. **Question:** We think we could successfully provide services to more than one area for $300,000. Can we leave that to you to decide where you need us or should we propose the area?

Response:

You should propose the area you wish to cover. You may also indicate your willingness to be flexible.

124. **Question:** If we want to only serve a portion of an area, would that lessen our chances of receiving the grant?

Response:

The results will depend on the other grant applications we receive.

125. **Question:** Can you give me an example of a "compelling justification for a change in service area boundaries?

Response:

To justify any difference from the proposed areas, please explain how your change in service area will improve services to beneficiaries and benefits to Social Security.

126. **Question:** We cannot find some of the Zip Codes or counties listed that we serve in any of your designated service areas.

Response:

We tried to include all counties, parishes, incorporated cities, and ZIP code areas when we proposed the distribution, but we are aware that we may have missed some counties, and ZIP codes. If you notice something missing, please let us know, and if you wish to do so, include it in your requested territory. We intend to cover the entire U.S. and all U. S. territories.

127. **Question:** I don't see a map for our state. Is Social Security offering funding opportunities for our state?

Response:

If we do not include a map of your state in the maps, it is because we intend that the awardee cover the entire state in other words, we propose one WIPA for the entire State. Please see your state listing in Appendix A for confirmation.

128. **Question:** Can employees who work part time under the State Department of Rehabilitation (DOR) program also work 40% Full Time Equivalent as CWICs under the WIPA Grant? The work performed under the State Department of Rehabilitation program involves providing job development and placement services to consumers referred to the agency from the State Department of Rehabilitation. The Department of Rehabilitation program provides no operational funding to the agency. The agency receives payment from the DOR only when certain milestones are met for each individual consumer.

Response:

Explain the situation and provide justification in your application. We will consider your proposal however; the circumstances you describe may violate the need for a firewall between the Employment Network (EN) direct services and WIPA direct services. Given the information you provide, we cannot make a determination without reviewing all of the details.

129. **Question:** Regarding the minimum 25% of total work effort for project supervisors, is that only for the lead organization or for all subcontractor supervisors as well?

Response:

Assuming an individual provides direct supervision for CWICs, whether for the primary recipient or for a subcontractor, we require that individual to commit at least 25% of a full-time position to WIPA supervision.

130. Question: Can we include any success stories we have with our current beneficiaries in our project narrative section of the proposal? If yes, in which section should we place the stories? Would there be a minimum number?

Response:

You may include success stories if you wish. We suggest a limited number however as you do have page constraints. Reviewers will spend more time assessing your business plan and how you intend to manage and operate a WIPA rather than with beneficiary success stories. If you choose to include a limited number of success stories, you can include these as addendum along with letters of support.

131. Question: In which section could we place information on all the training the current staff has undergone that is related to Social Security, as well as federal and state benefits?

Response:

You should include information on the training and education of current staff (assuming you intend to retain these staff) in the section on personnel, qualifications and proposed staffing.

132. Question: The training for the CWICs is required. Will any other benefits counseling certification be considered or will every staff person serving as a CWIC need to take the full training? For the CWIC training, do we need to budget funding for travel and accommodations for that training or is that covered by Social Security separately?

Response:

All CWICs providing services to our beneficiaries under WIPA must successfully complete the CWIC training and certification. Other training programs provide a good background, but we do not accept them in lieu of the Social Security approved CWIC certification. If you anticipate sending staff to attend training, you should include travel and lodging in your budget. There is no cost for the training and certification.

133. Question: Has the WIPA Help Line been established yet? What is the phone number?

Response:

The Help Line has been in operation since 2010. The number is: 1-866-968-7842 and 866-833-2967 (TTY).

134. **Question:** I wanted to touch base with you about a concern related to the new expectation that we change marketing materials to have the Help Line phone number as priority #1 over our parent organization's phone number. This is an extremely hard sell for some organizations that may take its branding very seriously. It is also an issue for our project, since we have historically served as our own Information and Referral engine. This practice may be stifling our efforts and those of other WIPAs to maximize WIPA dollars by moving more of those curious about work further along the employment path. (Question 134 is an excerpt from a longer and actual question).

Response:

First, we encourage, but do not require that the Help Line be the first line of contact. The Help Line is an option to improve efficiency for many projects, by allowing them to focus their limited WIPA staff on intensive services to beneficiaries who are already working or about to work. We understand that requiring the Help Line as the first contact may cause a problem for some projects with an established I & R network and a high level of recognition in the community. Handling your own Information and Referral will not preclude our awarding the cooperative agreement to your organization. You should explain in the proposal your particular business plan and how you intend to provide I&R as well as more intensive WIPA services. Provide justification and 'convince' us your approach works.

135. **Question:** How many CWICs should we anticipate needing to cover our service area?

Response:

We do not have a quick and easy formula for your question. Instead, you should plan to develop your budget using available funds, and focus on providing direct services with as much of the budget as is practicable. Consider our benchmark that states each FTE should manage at least 100 WIPA cases (intensive services) annually.

136. **Question:** How many beneficiaries does each CWIC serve?

Response:

We developed benchmarks using WIPA data from earlier iterations of the program. Under those benchmarks, we expect each CWIC to serve a minimum of 100 beneficiaries annually.

137. Question: How much time does each CWIC spend with a WIPA beneficiary?

Response:

That depends on their return to work status. It also depends on the beneficiary's goals and needs. The time may vary greatly from a few hours to considerable time over many months.

138. Question: How far back do you want us to go describing projects that are relevant to our experience?

Response:

The last five years should be sufficient.

139. Question: Is it OK to have CWICs do intake?

Response: Yes.

140. Question: In regards to the risk assessment, will a draft of our audit document be sufficient? We are still in the process of finalizing it.

Response: Yes.

Clearly indicate that it is a draft.

141. Question: Also regarding the audit on the risk assessment form: Our organization does not require the A1C audit because we are small. Will that negatively affect our chances of funding?

Response: No.

142. Question: May we put EN staff in our WIPA budget?

Response:

All personnel included in the WIPA budget must be providing WIPA-related services. We do not permit direct service or supervisory staff for an EN to also work as direct service or supervisory staff for WIPA cooperative agreements. Please see earlier FAQs for clarification regarding our firewall requirements.

143. Question: You keep referring to a "firewall". When you say firewall, do you mean software to prevent hacking?

Response: No.

We are using firewall as a metaphor to illustrate separation of the EN and WIPA programs.

144. **Question:** Over time, we have developed a robust referral network in our state for benefits specialists who will provide services for our State Vocational Rehabilitation program. Our WIPA budget is small, and we use it to fund services for beneficiaries that VR does not purchase or for long-term services after the initial counseling paid under VR. The counselors we pay also work for VR providing WIPA-like services. Do they need to choose between the VR and us in order to keep the EN and WIPA issues separate?

Response:

If the counselors you fund are also providing benefits counseling services for VR, rather than EN-like employment services under the Ticket to Work program, we do not consider them to have a conflict of interest however, include a clear description and explanation in your proposal regarding staffing and we will review and consider your proposal.

145. **Question:** We are going to provide a considerable amount of funding to augment WIPA services. Do we put those funds in the WIPA budget? If not, where do we show our contribution?

Response:

Great news. The budget you submit should include information on how you will allocate your WIPA funds and the amount you must match according to the 5% requirement. If you wish to outline the additional funds your project will provide to augment services throughout your service area, you should explain that in the description of your business model in the application narrative. You may also indicate in your budget narrative that you will provide greater than 5% matching non-Federal funds.