

WIPA FAQ #3

(Questions 55-91)

March 6, 2015

55. Question (a): I live in a state with proposed service areas that changed, and my former service area is in more than one of the proposed awards. Can I apply for both cooperative agreements, and hire subcontractors to handle the extra area?

Response:

The proposed areas are “proposed”, not mandatory. You may request those areas you wish to serve in your one application. You may not apply for more than one cooperative agreement for the same service areas.

Question (b): What if we applied for one grant, and we subcontracted with another grantee? Could we cover our old territory that way?

Response:

Yes, if the total of the cooperative agreement your organization added to the sub-contractual amount, is \$300,000.00 or less. For example, if Social Security awards your organization a cooperative agreement worth \$185,000.00, you could only accept a subcontract if it did not exceed \$115,000.00.

56. Question: If an agency is applying for statewide coverage that is capped in Appendix A, is that the absolute maximum that will be allotted, or may we apply for the \$300,000.00 maximum.

Response:

You may apply for additional funding as long as you justify the request, demonstrate that the total amount you request is \$300,000.00 or less, and you understand that we may not be able to meet your request.

57. Question: Who shall advise our partners of changes in the WIPA program?

Response:

Social Security will advise our field and regional offices about the new WIPA projects and provide information on revisions to the WIPA model. Part of a new project’s outreach should include contacting community partners and Social Security offices in the areas the new projects serve.

58. Question: I attended the conference call on February 24, and I was concerned about the firewall requirements as they apply to State VR agencies. I supervise WIPA staff, and I perform administrative duties for the Ticket to Work. I am responsible for billing Social Security for cost-reimbursement or EN services. I do not work with beneficiaries directly, nor do I supervise the staff that does assist beneficiaries working with our EN or State VR agency. Am I required to drop part of my duties?

Response:

Our goal is to eliminate conflicts of interest for staff involved in direct service and immediate supervision for a WIPA and at the same time, an EN or VR. High-level administrative staff may be able to continue their duties for both programs as they are removed from our beneficiaries and from supervision of direct service personnel. Your question raises a slightly different issue, which is working on administrative matters for one program and direct service/supervision for the other. Explain clearly in the proposal how you will manage both sets of responsibilities. You may formally request a review and exception and describe how you will maintain separation between the programs. We will examine such situations on a case-by-case basis.

59. Question: We have a program in place with our State VR agency. When we find work for a beneficiary our State VR agency pays a fee. With the WIPA Program, would we need to establish a separate firewall, and would the employees that work on the Employment Services Program part time also be able to work 40% FTE on the WIPA Program? Can a project director work on both programs, 25% FTE on each program?

Response:

This situation is complex. You are not acting as an EN, but you are providing services for an EN (the State VR agency). If the State VR agency were only requiring benefits counseling services, we would not require a firewall. In this circumstance, we would need more information to make a determination. The best course is to fully describe the staffing and role relative to the State VR program, and document your understanding that you may need to create and maintain a firewall if awarded.

60. Question: If we need to justify assigned staff to either a WIPA and a PABSS project, or a WIPA and an EN, when do we submit the letter requesting the exception?

Response:

You may include a brief description in the application of what you propose and then, subsequent to an award, make a formal request for specific exceptions to the firewall.

61. Question: Can a cost-share in the budget be met with in-kind services? Can it be more than five percent?

Response: Yes.

The cost-share may be in-kind or direct contributions. You need only document the required five percent cost-share. Please note that the cost-share may not be federal funding. See page 24, Part III.B of the RFA on Cost Sharing for instructions.

62. Question: Can we receive credit for training from sources other than the national training contractor to meet our 18-credit requirement?

Response:

We will provide additional guidance when we award the new WIPA projects. We anticipate allowing credit for training on state and local benefits.

63. Question: What kind of quality assurance does Social Security use on the WIPA program?

Response:

We use rigorous program monitoring, site reviews and benchmarks as our primary monitoring tools for WIPA. Social Security will provide information and technical assistance and training on our requirements for internal quality assurance practices for the new grantees.

64. Question: Can CWICs use Skype on their smartphones to provide distance services to beneficiaries?

Response:

We will provide additional information and clarification on the technology we will allow.

65. Question: Do the five sections of the Project Narrative have point values in the evaluation, and must we include evaluation criteria in the Project Narrative?

Response:

The evaluation criteria describe the aspects of the project narrative that reviewers will use to assign points to the application. The evaluation criteria offer additional guidance about how to write the narrative. They are not a separate requirement.

66. Question: Will we use HotDocs for Benefits Summary and Analyses (BS&As)?

Response:

We will determine which software to use and offer guidance for all of the projects following new awards for the National Training and Data Center contract and the WIPA cooperative agreements.

67. Question: Is there a specific percentage for a WIPA project's administrative costs that's dedicated to overseeing subcontractors?

Response:

No, but if you have an approved indirect cost rate agreement with Social Security, you may use the same indirect cost rate when budgeting for your subcontracts.

68. Question: Do letters of support count toward the 75-page maximum length of the Project Narrative?

Response: No.

Resumes, letters of support, and budget attachments do not count toward the 75-page maximum.

69. Question: Can continuing education be written into a WIPA's budget?

Response:

Yes, training is an allowable expense, provided that the training does not duplicate training Social Security provides through our National Training Center contractor.

70. Question: Can CWICs, after meeting the 40 percent service requirement, use the remaining 60 percent of their time on signing up people for benefits?

Response:

We are only authorized to oversee how projects use staff paid under the cooperative agreement with Social Security.

We strongly recommend, however, that WIPA staff avoid those services, even when paid by a different funding source during time not dedicated to WIPA, which we prohibit under the WIPA cooperative agreement. These prohibitions include assisting people to apply for benefits, lobbying, or representing beneficiaries in appeals against Social Security. If a staff member represents himself or herself as a CWIC to the community, that role creates the appearance of a conflict of interest if the same individual also conducts services that our funding restricts.

71. Question: What activities qualify as direct services by CWICs?

Response:

Direct services are those performed in conjunction with, or on behalf of beneficiaries and includes writing BS&A reports, providing counseling, investigating benefits situations, etc.

72. Question: If there is a new training and technical assistance contractor in the new iteration of WIPA, will that contractor provide sufficient training for CWICs to meet their 18 continuing education credit requirement each year?

Response: Yes.

The purpose of this requirement is to ensure sufficient practice to build experience and maintain competence.

73. Question: We currently use our own toll-free intake service. If we use the Help Line as our point of contact, does that prohibit continuing our intake line?

Response: No.

We envision using the Help Line as a way to create more time to spend on intensive benefits counseling and related tasks for work ready beneficiaries. Your organization may want to assess the value of having both.

74. Question: Will Project Directors who are also CWICs need to complete Continuing Education Credits, and if so, are there special Continuing Education Credits for Project Directors?

Response: Yes.

All CWICs, including Directors who are also CWICs, must complete 18 Continuing Education Credits annually to retain certification in order to work with beneficiaries. The new training and technical assistance contract may offer some courses specific to managers for continuing credit.

75. Question: Is there a plan in place if a state does not receive a sufficient number of adequately qualified applicants for its WIPA service areas?

Response: Yes.

Social Security will post a request for applications for the areas that are not yet covered.

76. Question: My WIPA receives funding from the State VR agency for one of our staff. This staff person is fully an employee of the WIPA, and not an employee of the State VR agency. Do we need to request an exception to the firewall?

Response:

No, this arrangement does not violate the firewall because the individual is an employee of the WIPA only, even though VR provides the funding.

77. Question: Does Social Security intend to request that the Help Line capture information about the beneficiary's access to email, or to a printer for documents?

Response:

We have no plans to change the current Help Line protocol. We will disseminate future Help Line capabilities and requirements later – once we award a new contract.

78. Question: You specify that a Project Director should commit to at least 25 percent of his or her time on WIPA. Is it acceptable for a Project Director to serve WIPA full-time?

Response: Yes.

79. Question: If Social Security offers us a new WIPA cooperative agreement, will our staff with level 5 suitability need to reapply for suitability?

Response:

In most cases, we will be able to transfer the suitability determination from the existing cooperative agreement to the new one without a new application.

80. Question: The slides for the February 24, 2015 call stated that the person submitting the application must be the authorized signatory for our organization. How do I know who that is?

Response:

The individual who completed the information required to register your organization in the System for Award Management (SAM), indicated the authorized signatory for your organization. You should check with your Director to determine who is your authorized signatory. If your organization has not yet registered, see <https://www.sam.gov/portal/SAM/#1>.

81. Question: Could we include a letter that we received from the local School District concerning a Memorandum of Understanding (MOU) approval between this organization and our agency?

Response:

You may include any letters of support you wish with your application.

82. Question: Would it be beneficial to submit our agencies benchmark report as part of the narrative even if it's not completed for the year?

Response:

The reviewers will not use benchmark reports to evaluate applications. Since this is a full and open competition, many applicants will not have access to similar reports.

83. Question: Is there any consideration given to prior contract holders in the points system?

Response:

While there are no specific points awarded for prior WIPAs, the review panels will use documented experience as part of the evaluation.

84. Question: In regards to the Prospective Awardee's Pre-Award Risk Assessment, question number four refers to grant management officer. Is it referring to the individual that manages the grant at the federal level or someone within our organization?

Response:

The title "Grants Management Officer" refers to a Social Security employee.

85. Question: We need to contract in order to provide qualified ASL interpreters as an accommodation for beneficiaries who are deaf. We serve the entire state of Arizona and are not able to use the same interpreter for every beneficiary that needs the services. Do interpreters contracted with our project require level 5 suitability?

Response:

If you use a WIPA employee as an interpreter, then yes, that individual will need level 5 suitability. We do not require level 5 suitability for interpreters of ASL or other language interpreters if they operate on an as needed basis.

86. Question: We are concerned about who will be working with the people who are not yet thinking that they can work and use the work incentives. No one is better qualified and ready to help encourage beneficiaries about the benefit of work and the incentives available than CWICs who help other beneficiaries on a daily basis. Developing that personal relationship and trust cannot be replaced by a website or call center. By limiting the WIPA's ability to outreach, SSA is cutting off the arm that can best reach those not yet thinking they can work.

Response:

You raise two separate issues. By outreach, we mean promoting the WIPA services to other agencies, groups, and individuals in the service area. We do not prohibit outreach, we are limiting the time and effort spent on outreach to allow for more focus on direct services. The second issue is using the Help Line to provide I&R and early encouragement toward work. We can assure you that the Help Line operators receive the same training as the CWICs and are skilled at providing I&R and services to individuals earlier in the employment process. With our limited resources, however, we must target funding to serve beneficiaries most at risk of overpayments, or of losing an already developed interest in work.

87. Question: Do you have a sample response to the request for application that we may view?

Response: No.

88. Question: Regarding document WIPA RFA-FINAL-1-29-15, page 28, Part III clause a. The sentence reads, "The application must list, in an appendix, recent or current work projects, along with a brief summary, a contact person, and references, including the address and telephone numbers of references the applicant references." We are guessing that the contact person is meant to be one of our own organization's employees, but we are not sure who the reference would be, perhaps a partner organization or federal program officer?

Response:

The reference should be someone at another organization that had experience with the services you describe. The contact person should not be a Social Security representative.

89. Question: Are we able to receive information on exactly how many letters of intent you have received from a particular state?

Response: No.

90. Question: On the map, Marshal County appears to be assigned to area 1, but in the appendix, it is listed in area 2 of the proposed service areas. Which is correct?

Response:

Marshall County in the State of Indiana should be included in proposed service area 2. We apologize for any confusion.

91. Question: South Boston is an incorporated city in Southern Virginia. It does not seem to be listed in the Appendix. Which service area does Social Security propose serve that city?

Response:

South Boston is included in the proposed service area 2 in the State of Virginia. We apologize for any confusion.