



TO: **BRP-Funded Agencies**

FROM: Bojana Zorić Martinez, Director
Bureau of Refugee Programs
Division of Family and Economic Security
Department of Children and Families

SUBJECT: *Verification and Documentation Requirements Policy*

BRP OPERATIONS MEMO			
No:	BRP 23-06		
DATE:	10/01/2023		
RCA	<input type="checkbox"/>	RMA	<input type="checkbox"/>
RMS	<input checked="" type="checkbox"/>	RHP	<input checked="" type="checkbox"/>
RSS	<input checked="" type="checkbox"/>	RSI	<input checked="" type="checkbox"/>
RYM	<input checked="" type="checkbox"/>	SOR	<input checked="" type="checkbox"/>
WFTCP	<input checked="" type="checkbox"/>	ASA	<input checked="" type="checkbox"/>
URSS	<input checked="" type="checkbox"/>		
ReMHI	<input checked="" type="checkbox"/>	RCDS	<input checked="" type="checkbox"/>

CROSS REFERENCE: [ORR Status and Documentation Requirements](#)

EFFECTIVE DATE: **OCTOBER 1, 2023**

PURPOSE

The purpose of this memo is to update documentation and verification requirements for the BRP-funded programs indicated with checked boxes above, and to announce a new feature of the Wisconsin Refugee Programs Database (WRPD), which allows documents to be uploaded into WRPD. A separate memo about other BRP-funded programs (e.g. Refugee Cash Assistance and Refugee Medical Assistance) will detail the ways this verification policy does and does not apply to those programs.

BACKGROUND

In order to meet program requirements, BRP-funded agencies must properly document and/or verify certain details about any individual enrolling in a BRP-funded program, including that individual's identity, immigration status, date of birth, date of program eligibility, service delivery, and other details specific to certain programs. Requirements include keeping original (or photocopied) items as evidence of the information, and/or recording written information about the case. In some instances, keeping documents and recording written information are both required.

In May of 2022, BRP introduced the Wisconsin Refugee Programs Database (WRPD) to its contracted agencies. As of the publication of this memo, the WRPD system has been updated to include a document upload feature, which provides an important new way to verify information. New requirements related to uploading documents are included in this memo.

Until the publication of this memo, documentation requirements were found only in an appendix of each agency's Contract, the Scope of Services. Those requirements are duplicated below in

the *Current Policy* section. All requirements detailed in the *Current Policy* remain the same, and BRP-funded agencies must continue to adhere to them.

The *New Policy* section below expands upon and further clarifies the *Current Policy* by providing more detailed information about verification and documentation requirements. As of October 1, 2023, BRP-funded agencies must also adhere to the *New Policy*. The *Current Policy* does not contradict the *New Policy*, and both continue to apply. All of the requirements detailed below will be considered BRP's Verification and Documentation Policy in the BRP Policy Manual.

CURRENT POLICY

Note: The current policy below references "the Contract", which is due to the policy's current location in the Contract's Scope of Services. This language is updated in the *New Policy* section and in the BRP Policy Manual.

DOCUMENTATION and RECORDS

In the provision of services, the Sub-recipient must maintain documentation and records that verify service delivery, participant eligibility, and compliance with all program requirements. All individuals served in a family must have clear documentation of the services provided to them and be reported on all required reports. This documentation and all related records must be recorded in WRPD, along with the uploading of any corresponding verification documents. The Sub-recipient must enter all required records into the WRPD within 10 working days of the occurrence to be recorded, unless otherwise and specifically stated within this Contract.

- A. Record Retention: In accordance with Wisconsin Statute § 16.61, DCF Retention Disposition Authorization (RDA) 00293000, and 45 CFR § 92.42, all records and documentation relating to activities and services provided under all programs must be retained by the Sub-recipient for a minimum of seven years following the last day of the contract period. In the event the Sub-recipient is unsure whether a document qualifies as a record that must be retained, the Sub-recipient must contact their BRP Contract Monitor for clarification.
- B. Program and Participant Case File Requirements: All documentation and records maintenance requirements will be satisfied by the Sub-recipient's satisfactory use of the WRPD. The Sub-recipient must, therefore, attend any WRPD-related trainings offered by BRP and must adhere to any requirements or other forms of guidance communicated by BRP as it pertains to the operation of WRPD or the maintenance of documentation and records. In addition, the Sub-recipient must adhere to the following documentation requirements:
 1. Immigrant Status Verification: Eligible immigrant statuses found in Section II must be verified by uploading into WRPD the acceptable verification documents corresponding to that status pursuant to BRP Operations Memos and/or ORR Policy Letters cited therein. If verification documents have already been uploaded to WRPD due to a participant's enrollment in another program, the Sub-recipient must record case notes to document that these eligibility items have been verified and are correct.
 2. Participant Demographics and Program Data: Required participant personally Identifiable information (PII), delivered services (listed in Section V), FSSPs and EPs, assessments, referrals and referral follow-ups, event attendance, job entry

or employment status changes, must be entered (as applicable) into WRPD on an ongoing basis and in the timeframe required by BRP (within 10 working days, as described in this section).

3. Case Notes: Case notes that support the verification of the delivery of the services described in Section V or records described in Section VIII must be recorded on an ongoing basis and in the timeframe required by BRP (within 10 working days, as described in this section).
4. Class/Group Records: If applicable, the Sub-recipient must maintain class/group-level documentation, such as dates, topics, and attendance on an ongoing basis.
5. Other Requirements: Any other documentation requirements or similar guidance provided by BRP at any time during the duration of this Contract.

NEW POLICY:

Under this new policy, documentation requirements may be met in WRPD by making either case notes or case comments. Case comments are written in designated "Comments" boxes that are related to a specific service or other function, such as making a referral or recording a job entry. Case comments are not viewable together in chronological succession, but rather only by viewing that specific type of service or function in WRPD. Case notes are written using the Case Notes function in WRPD, separate from specific services or other functions, and viewable together in chronological succession. This new policy supersedes guidance issued in an email on June 16, 2023, which stated that "comments" may not be used and only case notes will be accepted. As of October 1, 2023, both case notes and case comments satisfy documentation requirements. The only difference between them is where they are located and how they may be viewed in WRPD. Users may opt to use one or the other, depending on the ease of use related to the circumstances.

As stated in the *Current Policy*, all documentation and verification requirements must be completed within 10 working days of the occurrence requiring verification. This includes both entering case notes or comments and the uploading of documents. For example, when a service is provided to an individual, it must be recorded in WRPD within 10 working days of the service. For another example, when an agency determines an individual to be eligible for a program and enrolls them in that program, the required items verifying the individual's eligibility must be uploaded within 10 working days of enrollment. All such documentation and verification requirements are detailed in **Table 2** below, and must be completed within 10 working days.

Using the document upload feature of WRPD, for which complete instructions can be found in the WRPD User Manual, original or photocopied documents may be added to an individual's electronic WRPD case file. In some instances, a document must be uploaded and a case note or case comment must be made in order to verify certain information, while in others, a case note or case comment describing how information was verified is sufficient. In other instances, simply recording the service or uploading a document in WRPD is sufficient and no additional documentation is necessary. These requirements are detailed in **Table 2**.

When a document is uploaded into WRPD, the user must select from four WRPD Document Categories. Examples of which documents may be considered under which categories are found in **Table 1** below. This is not an exhaustive list because agencies may find it helpful to upload any number of documents related to the unique circumstances of an individual's case. Filing these documents under broad document categories avoids limiting the types of documents that may be uploaded.

Guidance pertaining to the requirements of any DCF Published Forms is not part of this memo. Existing forms should continue to be used as they have been used historically, and may now be uploaded into WRPD if a form is a requirement of a specific program. Any new forms will be published along with instructions pertaining to their specific use.

Table 1: WRPD Document Categories

WRPD Document Category	Example Documents
DCF Published Forms*	Release of Information Individualized Employability Plan (IEP)
Immigration-Related Documents	I-94 Passport with eligible stamps Employment Authorization Document with eligible code Order of Release on Recognizance form
Other ID Verification Documents	SSN card Drivers License State ID
Other Supporting Documentation	Check stub Appointment confirmation Class attendance sheet

*BRP may require using certain forms, which will be detailed in the Scope of Services and/or the BRP Policy Manual, and announced via operations memos.

The following chart details information for which additional verification and/or documentation is required, beyond what has been entered into WRPD. If a particular data field or service is not found on the table below, that data field or service does not require any additional verification or documentation. For such data fields and services, simply entering the information into WRPD in the course of regular reporting requirements is sufficient. For data fields and services that require additional verification or documentation, those requirements can be found in **Table 2** below.

The information required for each BRP-funded program depends on that program's reporting requirements. For example, the Refugee Medical Screening verification details apply only to programs required to provide that service, while immigration status verification details apply to all BRP-funded programs. Contracted agencies are responsible for knowing the reporting requirements associated with the specific programs that they administer.

Table 2: WRPD Data Fields and Services Requiring Verification

WRPD Data Fields Requiring Verification and/or Case Notes		
Data Field	Acceptable Forms of Verification	WRPD Document Category
Immigration Status	-See Status and Documentation Requirements for the ORR Refugee Resettlement Program * for all ORR-eligible statuses and each of their corresponding acceptable verification documents	Immigration-Related Documents
Alien Number	-Same as above; alien number may	Immigration-Related

	not be immediately available, but once it has been entered into WRPD, a corresponding verification document must be uploaded	Documents
SSN	-SSN card	Other ID Verification Documents
Identity (not related to immigration status; e.g. name)	-Any unexpired immigration document OR -Any other reliable, state-issued document that verifies identity	Immigration-Related Documents OR Other ID Verification Documents
Date of Birth	-Any unexpired immigration document that includes a date of birth, from the above ORR resource OR -Any other reliable, state-issued document that verifies birth date	Immigration-Related Documents OR Other ID Verification Documents
Date of Eligibility (e.g. Date of Arrival, Date Entered Into Community, Date Status Granted, etc.)	-Any unexpired immigration document that includes date of arrival to the US or date of eligible status granted, from the above ORR resource	Immigration-Related Documents
Participant Consent	-Bureau of Refugee Programs Participation Agreement (DCF-F-5633-E)	DCF Published Forms
Associated Enrollment	- Bureau of Refugee Programs Participation Agreement (DCF-F-5633-E)	DCF Published Forms
Case Notes or Comments	-Case notes or comments must have a corresponding verification item if: <ol style="list-style-type: none"> 1. They describe a change that was made to data entered by another agency (e.g. alien number corrected, corresponding Immigration Document uploaded) (Exception: address changes do not require a verification item, only a case note or comment) 2. They describe an interaction for which a Confidential Release of Information and Discussion (DCF-F-5632-E) form was used (e.g. case notes document a 	<ol style="list-style-type: none"> 1. Dependent on the change that was made 2. DCF Published Forms

	discussion with a sponsor)	
WRPD Services Requiring Verification and/or Case Notes		
Service	Acceptable Forms of Verification	WRPD Document Category
Filed Immigration Forms (e.g. Affidavit of Relationship, form I-730, form I-821, etc.)	-A copy of the application receipt must be uploaded	Immigration-Related Documents
Any Additional Service (approved by DCF)	-Case notes or comments describing the additional service are required	N/A
Case Management (referral)	-Case notes or comments describing the referral are required -If applicable, any referral form(s) completed must be uploaded	N/A Other Supporting Documentation
Complete N-400 (Citizenship Assistance)	-A copy of the application receipt must be uploaded	Immigration-Related Documents
Complete N-648 (Citizenship Assistance)	-A copy of the application receipt must be uploaded	Immigration-Related Documents
EAD Assistance	-Case notes or comments describing the EAD assistance are required	N/A
Emergency Services	-Case notes or comments describing the Emergency Services are required	N/A
Fee Waiver (Citizenship Assistance)	-A copy of the application receipt must be uploaded	Immigration-Related Documents
Health-Related Services	-Case notes or comments describing the Health Related Services are required	N/A
Immigration-Related Legal Services	-Case notes or comments describing the Immigration-Related Legal Services are required -If applicable, any immigration forms completed must be uploaded	N/A Immigration-Related Documents
Refugee Medical Screening (RMS)	-In addition to completing the RMS page, case notes or comments are required and must indicate when the After Visit Summary (AVS) has been received and where it is stored (<i>Do not upload the AVS</i>)	
SSI Application Approval	-The SSI Application Approval must be uploaded	Other Supporting Documentation
Wellness Group post-assessment completed with improved well-being	-Wellness Group post-assessment must be uploaded	Other Supporting Documentation

*This ORR document is the most comprehensive resource for acceptable proof of all ORR-eligible statuses. Please contact DCFRefugee@wisconsin.gov with related questions.

It is only necessary to verify information in **Table 2** once. If one of the acceptable sources of verification is already present in WRPD at the time of program enrollment, use the existing documentation to verify, but note that all program staff are responsible for ensuring that program's requirements have been met.

Backdating Verification Requirements

BRP-funded agencies must adhere to all requirements detailed in *New Policy* for anyone enrolled and actively participating in BRP programs on or after October 1, 2023. The requirements detailed in the *Current Policy* have been in effect since the FY 2023 contracting period and continue to apply. Agencies may be required by BRP Contract Managers to adhere to additional requests to backdate specific forms of documentation.

Documentation Best Practices

Case notes or comments must be written in third person (e.g. "Case Manager changed address information based on client report") and must include basic information such as "who was involved", "what happened", "when", as well as noting any important follow-up that must be done or has taken place.

Databases Other than WRPD

As of October 1, 2023, both current and new documentation and verification requirements detailed in this memo must be satisfied only by WRPD.

WISCONSIN REFUGEE PROGRAMS DATABASE (WRPD)

Refer to the WRPD User Manual for technical guidance related to the proper use of the document upload feature.

TRAINING

Technical assistance regarding verification and documentation requirements, as well as use of the document upload feature, will be announced following the publication of this memo.

AGENCY ACTION

Agencies must adhere to the requirements detailed in this memo beginning on October 1, 2023.

ATTACHMENTS

None

CONTACTS

For BRP Policy Questions: DCFRefugee@wisconsin.gov

For WRPD Questions: DCFWRPDSupport@wisconsin.gov

DCF/DFES/BRP/RD