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State of Wisconsin
Governor Scott Walker



TO: **W-2 Agencies
Training Staff**

FROM: Edward Emmons, Acting Director
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BWF OPERATIONS MEMO					
No:	18-20				
DATE:	10/16/2018				
W-2	<input checked="" type="checkbox"/>	EA	<input type="checkbox"/>	CF	<input type="checkbox"/>
JAL	<input type="checkbox"/>	RAP	<input type="checkbox"/>	Other EP	<input type="checkbox"/> *

SUBJECT: *Scanning Highly Confidential Documents into ECF for W-2*

CROSS REFERENCE: Before 10/27/2018: [ECF Handbook, 1.4 Advanced Functions](#)
After 10/27/2018: [ECF Handbook, Edit Attributes](#)
Before 10/27/2018: [ECF Handbook, 5.1.3 Document Codes or Indexing/Validation](#)
After 10/27/2018: [ECF Handbook, Document List & Codes](#)
Before 10/27/2018: [ECF Handbook, 5.1.4 Document Retention and Document Destruction](#)
After 10/27/2018: [ECF Handbook, Frequently Asked Questions](#)
[W-2 Manual, 4.2.2.1 Protecting Confidential Information about W-2 Participants](#)
[W-2 Manual, 4.3.3 Case Comments](#)
[W-2 Manual, 4.4.2 Scanning Requirements](#)
[W-2 Manual, 4.4.3 Record Retention Requirements](#)
[W-2 Manual, 4.4.6 Storing Confidential Information](#)
[W-2 Manual, 4.6.3 Transferring Formal Assessments](#)

EFFECTIVE DATE: October 27, 2018

PURPOSE

The purpose of this operations memo is to announce new functionality and supporting policy that enables Wisconsin Works (W-2) agencies to scan highly confidential W-2 information into the Electronic Case File (ECF) instead of storing the information in a sealed envelope in the paper file.

BACKGROUND

Federal and state laws restrict the use and disclosure of protected health information, including but not limited to:

- Information regarding domestic abuse
- Records pertaining to treatment for mental illness
- Developmental disabilities
- Alcoholism and drug dependence

Due to the nature of the W-2 program, accessing information of this nature – referred to as *highly confidential information* – is often necessary in order to provide effective services to assist individuals in obtaining and maintaining employment. Previously, W-2 agencies were required to store highly confidential information in a sealed envelope in a paper file. The new requirement to scan highly confidential information into ECF, along with the new supporting policy, will provide better protection of participants' highly confidential information while also improving the efficiency of agency operations.

UPDATED W-2 POLICY

W-2 Manual Chapter 4 now addresses scanning highly confidential information into ECF and accessing highly confidential information in ECF. In addition, the list of information that is considered highly confidential for purposes of the W-2 program has been updated. The updated W-2 Manual sections are attached with all policy changes incorporated. Policy that was removed is struck through and policy that has been added is underlined.

SCANNING HIGHLY CONFIDENTIAL INFORMATION INTO ECF

Current Policy

W-2 agencies are prohibited from scanning highly confidential information into ECF.

Updated Policy

W-2 agencies must scan all highly confidential information into ECF except attendance documentation that contains highly confidential information. As with all other documents, W-2 agencies must scan highly confidential documents into ECF within 30 calendar days of receipt or within 30 calendar days of the relevant case action having been performed in CARES.

The following DCF forms will be updated to include the ECF document code:

- The ECF document code **WPM** will be added to the [Need to Care for Disabled Family Member \(DCF-F-DWSP10786\)](#) form.
- The ECF document code **WPM** will be added to the [Mental Health Report \(DCF-F-126\)](#) form.
- The ECF document code **WME** will be added to the [Medical Examination and Capacity \(DCF-F-DWSP2012\)](#) form.

Attendance documentation that contains highly confidential information must be stored in a sealed envelope in the paper file under lock and key.

See attached updated [W-2 Manual Section 4.4.2](#) and [4.4.6](#) for the updated policy.

The ECF Handbook will be updated with the new codes on October 27, 2018.

STORING AND ACCESSING HIGHLY CONFIDENTIAL INFORMATION IN ECF

Current Policy

The Financial and Employment Planner (FEP) must store all confidential information in a sealed envelope in the paper file.

Updated Policy

The FEP must store all highly confidential information in ECF. Only the FEP assigned to the case and the FEP's assigned supervisor may access a case's confidential information in ECF. Other staff within the W-2 agency can access confidential information only when their duties require that they have access to the confidential information. In this situation, staff must work with the FEP assigned to the case or the FEP's supervisor to obtain the needed information.

[See attached updated W-2 Manual Section 4.4.6.](#)

RECORD RETENTION AND DELETION

Current Policy

There is no W-2 policy that addresses retention of highly confidential information scanned into ECF and deletion of documents in ECF.

New Policy

If agencies retain highly confidential documents for at least a week in the event staff discovers scanner operator error, the confidential documents must be stored in a sealed envelope in the paper file under lock and key.

W-2 agencies must not delete any documents from ECF unless the document is scanned under the wrong case. In this situation, the agency must either re-index the document to the correct case or delete and rescan the document. See the ECF Handbook for more information. In the event a duplicate copy of a highly confidential document is created, the copy must be treated with the same level of confidentiality as the original document.

[See attached updated W-2 Manual Section 4.4.3.](#)

TRANSFERRING FORMAL ASSESSMENTS

Current Policy

When formal assessments and related information must be transferred between W-2 agencies, the previously assigned agency must send the information to the new agency via US mail or other delivery services with tracking or through a courier.

Updated Policy

Policy is updated to allow agencies to obtain formal assessments and related information from ECF. The previously assigned agency must scan the requested documentation into ECF using the WPM code or follow existing policy for sending the information. Once the case is transferred, the newly assigned FEP will have access to the restricted documents in ECF.

[See attached updated W-2 Manual Section 4.6.3.](#)

HIGHLY CONFIDENTIAL INFORMATION FOR W-2

Current Policy

Certain highly sensitive information is considered highly confidential for the purposes of the W-2 program. Also, staff within the W-2 agency may access highly confidential information if they have a bona fide need to know.

Updated Policy

The list of highly confidential information for W-2 is updated and expanded to include information related to the following conditions:

1. Physical health, including HIV/AIDS
2. Mental health
3. Disabilities and impairments, including physical disabilities, learning disabilities, cognitive impairments, and developmental disabilities
4. Alcohol and substance abuse
5. Domestic abuse

Records related to the above listed conditions are considered highly confidential and include:

1. Assessments, including vocational and functional evaluations
2. Screening and test rest results
3. Treatment notes
4. Diagnoses

In addition, policy is updated to clarify that staff within the W-2 agency may access highly confidential information only when their assigned duties require that they have access to the information.

[See attached updated W-2 Manual Section 4.2.2.1.](#)

REFERENCING HIGHLY CONFIDENTIAL INFORMATION IN CASE COMMENTS

Current Policy

Agencies must cross-reference highly confidential information by only generally referencing the information in CARES screen CMCC and providing further details in the paper file. Also, case level comments may be entered into CARES Mainframe.

Updated Policy

Agencies must continue to only generally reference highly confidential information within case comments; policy is updated to clarify that further details now will be provided in ECF. In addition, policy is updated to clarify that case level comments are entered into Cares Worker Web (CWW) and not CARES Mainframe. Finally, policy related to referencing highly confidential information is moved from W-2 Manual Section 4.4.6 and inserted in W-2 Manual Section 4.3.3.

[See attached updated W-2 Manual Section 4.3.3.](#)

SCANNING EXISTING PAPER COPIES OF CONFIDENTIAL DOCUMENTS

In addition to scanning all newly obtained confidential documents into ECF moving forward, agencies must scan into ECF all paper copies of confidential documents for all cases that received W-2 services on or after January 1, 2018. This requirement includes all open cases, as well as cases that closed on or after January 1 of this year. Further, all confidential documents for these cases must be scanned into ECF regardless of the age of the document. These documents must be scanned into ECF no later than April 30, 2019.

Per W-2 Manual Section 4.4.3, agencies must retain case-related paper documents for three years after a case closes if the agency has not scanned the documents into ECF. Further, for cases involved with any litigation, claim, or audit, W-2 agencies must not destroy paper documents until three years from the date the issue was resolved. Therefore, for any cases that closed prior to January 1, 2018, for which the agency still retains paper copies of confidential documents, W-2 agencies may pursue one of the following two options:

1. Scan the confidential documents into ECF and destroy the paper copies of the confidential documents; or
2. Retain the paper copy of the confidential document in a sealed envelope in the paper file under lock and key until the end of the applicable retention timeframe. At that point, the agency must destroy the confidential document.

NEW ECF DOCUMENT CODES

DCF established four new document codes within ECF to store highly confidential W-2 information. The new document codes are:

- **WPM.** Scan all documents pertaining to physical health, mental health, and disabilities and impairments **except the W-2 Medical Examination and Capacity Form and disability-related assessments** under this code (see below). Documents to be scanned under this code include but are not limited to assessments, diagnoses, and treatment notes.
- **WAA.** Scan all documents pertaining to alcohol and substance abuse under this code. Documents to be scanned under this code include but are not limited to assessments, screening results, test results, and treatment notes.
- **WDV.** Scan all documents pertaining to domestic violence under this code.
- **WVF.** Scan all documents pertaining to disability-related assessments under this code. Documents to be scanned under this code include but are not limited to vocational assessments and functional assessments.

There are two existing document codes that W-2 agencies must also use to store highly confidential documents. These document codes are:

- **WME.** Scan the [W-2 Medical Examination and Capacity \(DCF-F-DWSP2012\)](#) form under this code.
- **WEX.** Scan the [W-2 Agency Time Limit Extension Approval Record \(DCF-F-5214\)](#) and the [W-2 Agency Time Limit Extension Denial Record \(DCF-F-5215\)](#) forms under this code.

CARES and/or CARES WORKER WEB (CWW)

All documents that use one of the W-2 restricted document codes can only be viewed by the FEP assigned to the case and the FEP's assigned supervisor, even if the documents are linked to a case that also has an IM worker assigned. The restriction to W-2 workers occurs at the document level, not the case level.

There is no change in process for scanning a document after it has been processed by a W-2 worker.

If a document is scanned using one of the W-2 restricted document codes before it is processed, W-2 workers will need to process the document from within CWW. This may occur if an individual uploads a document through ACCESS mobile (when functionality is released), or it is assigned one of the restricted document codes by a scanning worker at the Centralized Document Processing Unit or the Milwaukee Document Processing Unit.

Unprocessed documents are listed on the workers CWW homepage in the "My Tasks" section. Click the magnifying glass button to view and process the documents. Process Help Sections 45.2 CWW Document Viewer and 45.4 Linked Documents in the CWW detail how to process a document using CWW Document Viewer.

CARES Worker Web Home

Recent Cases/RFAs/ACCESS Applications/Change Reports

Type	Number	Primary Person	Accessed
Case			
Online Change			
Case			
Online Renewal			
Case			
Online SMRF			
Case			
ACCESS #			
Case			
Case			

My Inbox Items		
Type	Counts	
Apps with Priority Service	0	
Apps Received Before 09/17/2010	1	
Apps Received After 09/17/2010	1	
Total number of Apps	2	
Online Change Reports	1	
Online Renewals Received	1	
Online SMRFs Received	1	

My Tasks		
Type	Counts	
SMRFs	7	
Employer Verifications	0	
Cases with Unprocessed Documents	5	
Having Outstanding Verification Approaching	0	
Having Outstanding Verification Past Due	0	

Broadcast Messages

WEB INTELLIGENCE (WEBI) REPORTS

Agencies should use **Caseload Report 03: W-2 Caseload Detail Report** to identify cases that closed in the current month. Agencies should use **Caseload Report 09: W-2 Episodes Ending in a Month** to identify cases that closed in previous months. Using these reports, agencies can identify the cases that closed on or after January 1, 2018.

TRAINING

The following training resources will be updated to reflect the content of this memo and are available on the [Partner Training Team Learning Center](#) website:

- Electronic Case File (ECF) for W-2 Staff; and
- W-2 Eligibility Documentation Desk Aid.

AGENCY ACTION

W-2 agencies must familiarize staff with updated policies and ECF system changes and update any relevant standard operating procedures.

ATTACHMENTS

[W-2 Manual, Section 4.2.2.1 Protecting Confidential Information about W-2 Participants](#)

[W-2 Manual, Section 4.3.3 Case Comments](#)

[W-2 Manual, Section 4.4.2 Scanning Requirements](#)

[W-2 Manual, Section 4.4.3 Record Retention Requirements](#)

[W-2 Manual, Section 4.4.6 Storing and Accessing Confidential Information](#)

[W-2 Manual, Section 4.6.3 Transferring Formal Assessments](#)

CONTACTS

For W-2 Policy Questions in the Balance of State: Bureau of Regional Operations, W-2 Regional Coordinators

For W-2 Policy Questions in Milwaukee: Milwaukee Operations Section Regional Administrators

For W-2 CARES Processing Questions: W-2 Help Desk

DCF/DFES/BWF/NH