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**TO:** Income Maintenance Supervisors  
Income Maintenance Lead Workers  
Income Maintenance Staff  
W-2 Agencies  
Workforce Development Boards  
Job Center Leads and Managers  
Training Staff  
Child Care Coordinators

**FROM:** Janice Peters, Director  
Bureau of Wisconsin Works  
Division of Family Supports

**DFS OPERATIONS MEMO**

**No:** 07-58

**DATE:** 10/03/2007

FS	<input type="checkbox"/>	MA	<input type="checkbox"/>	SC	<input type="checkbox"/>
CTS	<input type="checkbox"/>	CC	<input type="checkbox"/>	W-2	<input checked="" type="checkbox"/>
FSET	<input type="checkbox"/>	EA	<input type="checkbox"/>	CF	<input type="checkbox"/>
JAL	<input checked="" type="checkbox"/>	JC	<input type="checkbox"/>	RAP	<input type="checkbox"/>
WIA	<input type="checkbox"/>	Other	EP	<input type="checkbox"/>	*

**PRIORITY: HIGH**

**SUBJECT:** Electronic Case File (ECF) Updates For Wisconsin Works (W-2)

**CROSS REFERENCE:** [ECF Manual](#)  
[Operations Memo 99-37](#)

**EFFECTIVE DATE:** Immediately

**PURPOSE**

The purpose of this memo is to provide policy and procedure updates to the Wisconsin Works (W-2) agencies on scanning and storing W-2-related case file documents in the Electronic Case File.

**BACKGROUND**

Through a joint project led by the Department of Health and Family Services (DHFS) in conjunction with the Department of Workforce Development (DWD), the Income Maintenance (IM) and W-2 agencies statewide have been moving toward a paperless case file system called the Electronic Case File (ECF). The W-2 agencies began receiving scanners in January 2006, unless it was an ECF pilot agency, which received scanners earlier. To date, all W-2 agencies have received at least one scanner. All non-CARES generated documents stored in the old paper case files are now scanned into ECF and discarded appropriately.

While DHFS has been issuing guidance on the use of ECF to its IM agencies, DWD is now issuing further guidance to all of the W-2 agencies, private and public. In most instances, DWD has mirrored DHFS's policies and procedures. However, via this memo, DWD is issuing specific guidance on W-2 related documents. This information was compiled by a workgroup comprised of local W-2 agency staff representatives. The workgroup was a mix of W-2 program staff as well as staff well versed in the use of ECF. Not only did the workgroup review existing ECF documentation requirements, but it also reviewed ECF to prepare for future documentation requirements as required under Temporary Assistance for Needy Families (TANF) Reauthorization. The efforts of the workgroup resulted in changes to the existing ECF Document Types and Document Naming Conventions as well as more specific guidance to W-2 agencies on scanning timeframes, record retention and other miscellaneous ECF-related policies and procedures.

### ***ELECTRONIC CASE FILE (ECF) W-2 RELATED CHANGES TO DOCUMENT TYPES AND DOCUMENT NAMING CONVENTIONS ("Document Codes")***

One of the first tasks of the ECF workgroup was to review *all* of the existing Document Types contained in each Sub-folder, their associated Document Naming Convention ("Document Codes") and the Description/Special Instructions associated with each document code. The result of this review was to revise the Description/Special Instructions so that they provided a clearer description of the types of documents to be scanned under each code. Most of the changes identified were updated form names and removing unnecessary information. The majority of these changes were issued in the 07-03 release of the ECF Manual dated 5/31/07.

The second task of the workgroup was to focus its review on the existing Document Types contained in the W-2/FSET Sub-folder and the Restricted Sub-folder, their associated Document Naming Convention ("Document Codes") and the Description/Special Instructions associated with each document code on *W-2 related documents only* in order to see if the existing document types and codes met the business needs of the W-2 program. Based on this review, it was determined that, for the most part, the correct Sub-folder, Document Types and Document Codes were available, but that a better description of how to use these codes was necessary.

Below is a description of some of the major changes made by the ECF workgroup. Note that where there are changes to existing Document Types, agencies will not be required to do any conversions. If conversions are to be done, the State will do this behind the scenes. For example, the State will do a conversion based on the change described in the first bullet point below.

- Eliminate the Document Type *Physician's Evaluation*, Document Code *MDE* and store all medical assessments under Document Type *Medical Assessments*, Document Code *MAS*. At some point in the future, the DHFS will take all documents stored under *MDE* and move them to *MAS*.
- Clarified that W-2 hourly nonparticipation documents, strike documents and good cause documents must be stored in the *Restricted* Sub-folder, *Sanction and Good Cause* Documentation Type, *WSGC* Document Code. These documents must not be stored in the *Sanctions* Documentation Type, *SANC* Document Code. For W-2, only Intentional Program Violation (IPV) related documentation is stored in *SANC*. As a reminder, any information contained within CARES does not need to be scanned into ECF, e.g., WPNP screen information.

- Changed the Document Type *W-2 Barrier Screening Tool Agreement* to *W-2 Barrier Screening Tool Documents*. This change is meant to broaden the use of the document type to capture all BST related documents in addition to the agreement form.
- Moved the *W-2 Agency Extension Record* document type from the *W-2/FSET* Sub-folder to the *Restricted File* Sub-folder due to the confidential nature of the information.
- Changed the Document Type *Vocational Assessments* to *Non-medical Assessments*. This change is meant to broaden the use of the document type to capture other types of non-medical assessments including career/employment readiness, education, AODA and other types of non-medical assessments.
- Clarified that agency-generated appointment letters should be stored under the topic as it relates to the appointment. For example, if the appointment is to update an Employability Plan, the appointment notice would be stored in Sub-folder *W-2/FSET* under Document Code *WEP*.
- Three new Document Types were created:
  - 1) Document Type *Requesting Verification* – this document type is located in Sub-folder *Case Information* and has a Document Code of *VER*. The types of documents stored under this document type include all non-CARES generated requests for verification documents including checklists, agency letters and the *Request for Verification (DWSP-2302) form*.
  - 2) Document Type *W-2 Attendance Tracking* – this document type is located in Sub-folder *Restricted File* and has a Document Code of *WAT*. The types of documents stored under this document type include all individual timesheets, group sign-in sheets, computer printouts or other documentation verifying attendance at a W-2 activity, including education and training attendance documentation and facilitated job search activity tracking.
  - 3) Document Type *W-2 Job Search Logs* – this document type is located in Sub-folder *W-2/FSET* and has a Document Code of *WJSL*. The types of documents stored under this document type include all job search logs and any documentation used to verify contact with employers, e.g., copies of business cards, employer letters, etc.

Agencies must refer to the ECF Handbook, Section 1.5 to view all of the changes made to ECF document storage

## ***ELECTRONIC CASE FILE (ECF) POLICY***

### **SCANNING REQUIREMENTS**

1. *Back-file Scanning*: This refers to the scanning of all documents contained in the paper file up to the point when the agency began scanning documents for all open cases. Scan only current versions of documents that were used to make a determination for individuals in the current case over the last 14 months. It is expected that each W-2 agency will have scanned all case files and appropriate documentation as outlined in the ECF Handbook for open cases by June 30, 2008.

2. *Ongoing Case Scanning:* All ongoing case scanning will be completed within 30 calendar days of the reported/required case action having been performed in CARES or within 30 calendar days of being received in the W-2 agency. This applies to the scanning of new paper case file documents for open cases that are appropriate for the paper file and received after the agency began scanning. It includes the scanning of documents turned in at intake, review and those dropped off or mailed into the agency. There is an exception to this rule. See #3 below.
3. *Reopening Case Files that were closed prior to receiving a scanner:* The basic rule of thumb is to only scan materials that date as far back as 14 months, but not older than that.

Example 1: If a case has been closed for 14 months, the only documentation that would need to be scanned is the new documentation used to determine eligibility.

Example 2: If a case has been closed for 2 months, the agency would scan appropriate materials dated as far back as 12 months from the month of the closure.

Example 3: If a case has been closed for 11 months, the agency would scan appropriate materials dated as far back as 3 months from the month of the closure.

4. *Case Review Monitoring:* Files requested for review by the DWD must be scanned into the ECF, in their entirety, within 10 business days of the request. This may include cases requested for monitoring purposes, ad hoc queries or any other monitoring purpose.
5. *Transfer Cases:* When transferring a case, agencies must scan all relevant material prior to transferring the case.

If an agency is unable to meet these requirements, agency staff must notify the appropriate Division of Family Supports (DFS) regional administrator.

#### RECORD RETENTION REQUIREMENTS

With the advent of ECF, basic document retention and destruction policies have not changed. Agencies must still retain paper case documents for three (3) years and six (6) months from when all assistance groups close (W-2, child care, Medicaid, FoodShare) *if the documents are not scanned*. If there is any litigation, claim or audit during the three (3) year period in which the case was closed, the documents would need to be retained for three (3) years from when the issue(s) have been resolved. These situations include benefit recovery referrals, benefit recovery claims, a case pulled as part of the federal quality control review, cases of IPV, etc.

With ECF, documents that are scanned and stored are backed up several times during the day and nightly and the backups are stored offsite. Documents will not be purged until at least the minimum time period has passed for these documents.

Paper documents that are scanned and stored in ECF should be stored for at least a week in the event a scanner operator error is discovered. If an error does not occur, the documents may be destroyed at any time. This includes *copies* of birth certificates, Social Security cards, marriage certificates, etc. Originals of these documents must be returned to the owner. If an error does occur, the document should be rescanned. If for any reason a document does not appear in the ECF and the original is destroyed, it should be re-verified and rescanned. This situation should be rare.

### MISCELLANEOUS REQUIREMENTS

Access to ECF by Third Parties: According to the W-2 Manual, Section 4.7.2, information concerning W-2 applicants and participants generally must not be disclosed for any reason except when it is necessary for the administration of the W-2 program or, under certain circumstances, when requested by law enforcement officers. If the information requested is not directly related to program administration, it must not be provided.

However, according to Section 19.2.5 of the W-2 Manual, a W-2 applicant or participant may have a representative to assist in contesting a W-2 agency's decision. The applicant/participant and representative may request to view and copy any records pertaining to the decision. This is still the case, but due to the nature of ECF, at no time must a third party be given unsupervised access to ECF. If a representative requests review of a participant's file, the W-2 agency must:

- 1) Have an agency representative sit with the representative to review the case file documentation in ECF; or
- 2) Print out the appropriate documentation for the representative.

The agency may charge for this service. See Section 19.2.5 of the W-2 Manual for more information on charging representatives.

Consistency within an Agency: While the updates made by the ECF workgroup will help ensure consistent use of ECF across the state, it was recognized that there would always be a level of subjectivity when deciding upon where in ECF to store a document. In order to minimize the subjectivity within a W-2 agency, agencies should develop written, internal guidelines on document storage. Because the documentation matrix is available in spreadsheet format via a link from the ECF Manual, one option would be to download the spreadsheet and add your agency's internal forms and documents to it as a guide for all agency staff. A word of caution, however, that if your agency uses the documentation matrix, the matrix may change when a new ECF Handbook version is released. Therefore, an agency would have to make sure that it incorporated any new release changes into its agency specific documentation.

Documents supporting an application: Supporting documents for applications should be stored in the appropriate category if one exists. For example, for Job Access Loan applications, positive or negative notices would go in Sub-folder *Case Information* under Document Type *NOD* and rental agreements would go in Sub-folder *Expenses* under Document Type *SUE*. When doing so, put a notation at the top of the document prior to scanning referencing "JAL verification." This would be true of any type of application that contained supporting documentation, such as Emergency Assistance. If there is not an existing document type in which the document most appropriately belongs, it would be considered a part of the application and should be included with the application in Sub-folder *Case Information* under Document Type *APP*.

### ***FUTURE W-2 RELATED CHANGES TO ECF***

The ECF Workgroup spent a lot of time discussing the need for a folder within ECF to store confidential information related specifically to the W-2 program and not available to other programs using ECF, i.e., child care, Medicaid and FoodShare.

ECF currently has a Restricted Document Sub-folder used to store confidential information such as medical diagnosis, fraud investigation information, release of information documentation, etc. This Sub-folder can be viewed by the primary case worker, other workers who have update rights to the case within CARES and selected other users, such as DFS regional staff and state QC staff.

This current situation does not meet the needs of the W-2 program. Due to the nature of a W-2 participant's barriers, it is often times necessary to obtain highly sensitive, confidential information regarding these barriers. While obtaining this information allows for better coordination of activities and development of the Employability Plan, the laws governing protection of confidentiality of person health information restrict the disclosure of the information to other parties. Therefore, while the information can be shared within the W-2 program, it is not necessarily information necessary for the administration of other programs.

In order to abide by these confidentiality laws, current W-2 policy requires that agencies cross-reference sensitive, legally confidential information by only generally referencing the information in CMCC and providing further details in the paper file, but in a sealed envelope. In the past, when paper files were the norm, if a W-2 case closed, but a FS case remained opened, the paper file could be passed on to FS program staff, but the sealed envelope would remain in the W-2 file. With the advent of ECF, that is no longer possible.

DWD and DHFS are working together to develop a secure location for W-2 documents accessible only by W-2 staff. While this secure location is not yet available, we are anticipating that it will be by the end of this year. In the meantime, combined W-2 and IM agencies can scan this documentation into ECF. Private W-2 agencies should continue to store this sensitive documentation in a paper case file, but once a W-2 specific secure location is created, that documentation would need to then be scanned into ECF, including all backfile information (14 months maximum).

## **CONTACTS**

For ECF W-2 Policy Related Questions: BW-2 Regional Office Staff

For all other ECF Questions: In the [ECF Manual](#), click on the *Contact Us* link.

Program Categories – FS – FoodShare, MA – Medicaid, SC – Senior Care, CTS – Caretaker Supplement, CC – Child Care, W-2 – Wisconsin Works, FSET – FoodShare Employment and Training, CF – Children First, EA – Emergency Assistance, JAL – Job Access Loan, JC - Job Center Programs, RAP – Refugee Assistance Program, WIA – Workforce Investment Act, Other EP – Other Employment Programs.

DWD/DFS/BW-2/mmm