Department of Health Services
Division of Medicaid Services
1 West Wilson Street
PO Box 309
Madison WI 53707-0309

Telephone: 608-266-8922
Fax: 608-266-1096

STATE OF WISCONSIN

Department of Children and Families
201 East Washington Avenue
PO Box 8916
Madison WI 53708-8916

Telephone: 608-267-3905
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Date: February 15, 2019

DMS, DECE, and DFES Operations Memo 19-J2
Amended June 21, 2019

To: Income Maintenance Supervisors
Income Maintenance Lead Workers
Income Maintenance Staff
FSET Agencies
Workforce Development Boards
W-2 Agencies
Training Staff
Child Care Eligibility and
Authorization Workers and Supervisors

From: Rebecca McAtee, Bureau Director
Bureau of Enrollment Policy and Systems
Division of Medicaid Services
Department of Health Services

Katherine McGurk, Bureau Director
Bureau of Early Learning and Policy
Division of Early Care and Education
Department of Children and Families

Margaret McMahon, Bureau Director
Bureau of Working Families
Division of Family and Economic Security
Department of Children and Families

Affected Programs:
- ☒ BadgerCare Plus
- ☒ Caretaker Supplement
- ☐ Children First
- ☐ Emergency Assistance
- ☒ FoodShare
- ☒ FoodShare Employment and Training
- ☐ Job Access Loan
- ☐ Job Center Programs
- ☒ Medicaid
- ☐ Other Employment Programs
- ☐ Refugee Assistance Program
- ☐ SeniorCare
- ☒ Wisconsin Shares Child Care
- ☒ Wisconsin Works
- ☐ Workforce Innovation and Opportunity Act

Update to Ethnicity and Race in ACCESS, CARES Worker Web, and Correspondence

CROSS REFERENCE

ACCESS Handbook

EFFECTIVE DATE

March 2, 2019

PURPOSE

This operations memo announces improvements to how ethnicity and race information is collected in order to comply with federal regulations, standards, and guidance.

BACKGROUND

Federal regulations issued in the Food and Nutrition Service's (FNS) Civil Rights Manual and by the Centers for Medicare & Medicaid Services (CMS) at 42 CFR 438.340(b)(6), and guidance issued by the Administration for Children and Families (ACF) requires states to collect and report information on individuals' ethnicity and race. Individuals are not required to provide a response to questions on ethnicity or race to be determined eligible for a program, or to receive benefits or participate in a program. Individuals must be informed of what their ethnicity and race information may be used for when asked. Any information received on ethnicity and race may be shared with federal authorities and with managed care organizations for analysis to ensure the program or programs are administered in a nondiscriminatory manner and for program improvement.

The federal Office of Management and Budget (OMB) has developed standards for collecting ethnicity and race information as outlined in the Policy section of this memo. Agencies that report on any ethnicity or race data are expected to adhere to OMB standards. Wisconsin's applications for income maintenance (IM) programs have been out of compliance with OMB standards.

Effective March 2, 2019, CARES, ACCESS, and applications for assistance programs will be updated to display two distinct questions regarding ethnicity and race, include statements explaining that an individual is not required to respond, and describe how the government uses this information to comply with federal requirements and standards.

POLICY

The OMB standards require ethnicity and race to be collected as two separate questions and specify the order in which they must be collected. Ethnicity must be asked first and then race.

Individuals must be informed that responses may be used to help improve the State of Wisconsin's public assistance programs and make sure they do not discriminate based on ethnicity or race. This may include reporting ethnicity and race data to federal agencies or sharing ethnicity and race information with managed care organizations to support monitoring of health disparities. Beginning March 2, 2019, an "intended use" statement for ethnicity and race will be incorporated into application instructions and CARES Worker Web (CWW). When adding or updating ethnicity and race information for household members over the phone or in person, workers must read the intended use statement prior to asking for ethnicity or race.

Individuals are not required to provide a response for ethnicity or race in order to complete an application or receive a decision about their program eligibility or benefits; individuals may provide information on ethnicity, race, both, or neither.

Per federal requirements, the following two categories must always be provided when asking for an individual's ethnicity. The individual will only be able to select one:

- Hispanic or Latino
- Not Hispanic or Latino

Per federal requirements, the following five categories must always be provided when asking for an individual's race. The individual can select one or more of the following options as applicable:

- American Indian/Alaskan Native
- Asian
- Black/African American
- Native Hawaiian/Other Pacific Islander
- White

ACCESS

Any ACCESS section that collects this information will be relabeled "Ethnicity and Race" and will allow the independent collection of information of ethnicity and race. The instructions and statement regarding the intended use of the collected ethnicity and race data will appear above the questions whenever the individual is asked for ethnicity and race information in ACCESS. The question regarding ethnicity will always appear above the question for race. Responses to these questions are not required, and the individual can move on to the next page without entering any responses.

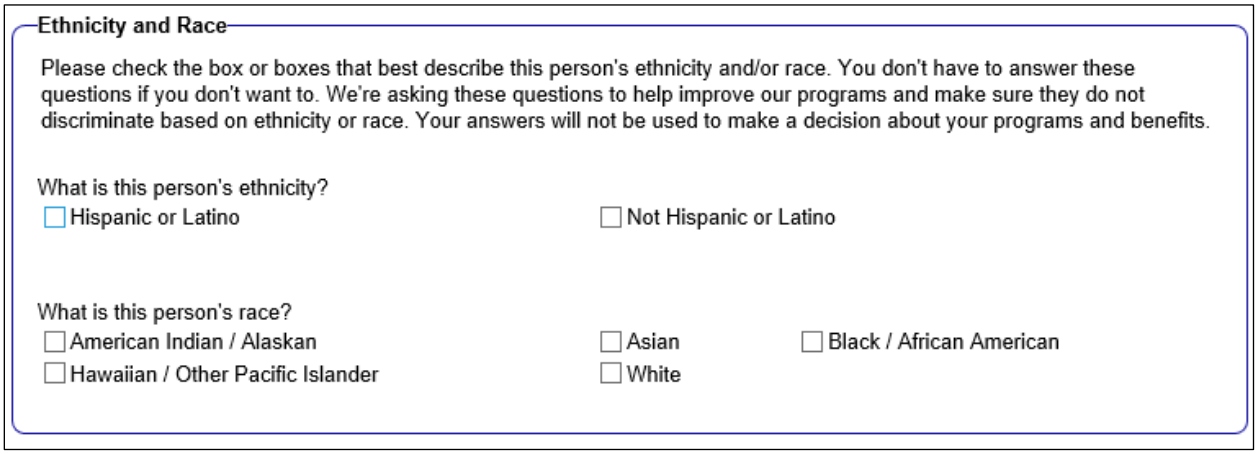


Figure 1 Ethnicity and Race Section From ACCESS Report My Changes

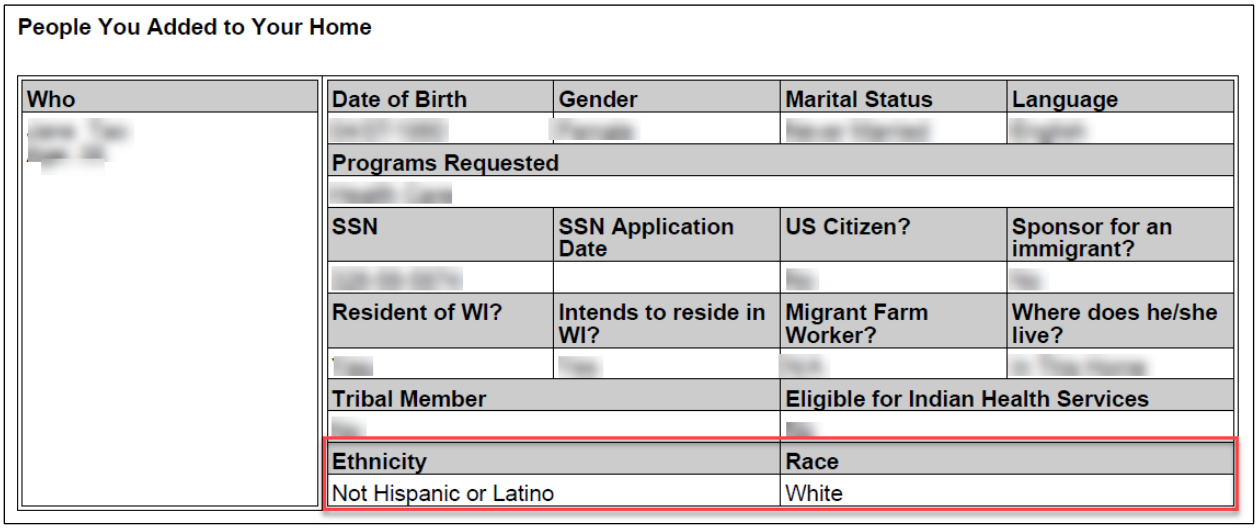
The individual can select one response for ethnicity. If the individual checks both answers for ethnicity and clicks Next, ACCESS will display an error message asking him or her to select only one option for ethnicity. Individuals can choose multiple selections for race.

Previously, race and ethnicity information was collected in a single question. Also, "Latino" identification was not included as part of the response for ethnicity.

For ACCESS applications in progress at the time of implementation, ACCESS will not redirect individuals to the People section of the module to questions regarding ethnicity and race prior to submitting the application. For any ACCESS applications where the individual already provided ethnicity or race, ACCESS will display any previously selected answers in the new format using the following logic:

- If the individual had indicated Hispanic for ethnicity, ACCESS will display the Hispanic or Latino response as checked. Otherwise, ACCESS will leave the two options for ethnicity unchecked.
- If the individual had indicated one or more responses for race, ACCESS will display each of those responses as checked. Otherwise, ACCESS will leave all values for race unchecked.

The ACCESS Summary will be enhanced to display the information on ethnicity and race as separate fields.



People You Added to Your Home

Who	Date of Birth	Gender	Marital Status	Language
	Programs Requested			
	SSN	SSN Application Date	US Citizen?	Sponsor for an immigrant?
	Resident of WI?	Intends to reside in WI?	Migrant Farm Worker?	Where does he/she live?
	Tribal Member		Eligible for Indian Health Services	
	Ethnicity		Race	
	Not Hispanic or Latino		White	

Figure 2 ACCESS Report My Changes Summary Page (People You Added to Your Home)

The ACCESS help text for each page where ethnicity and race information is collected will be modified to add information regarding how the individual can answer these questions. Also, text changes in ACCESS related to the questions concerning ethnicity and race will be translated and implemented in Spanish.

CARES WORKER WEB

ADDITIONAL DATA AND PERMANENT DEMOGRAPHICS PAGES

CWW currently collects information regarding ethnicity and race separately. However, the Additional Data page in Client Registration and the Permanent Demographics page in Application Entry will be updated to reverse the order in which information is collected, putting ethnicity questions first and race questions second.

Both pages will display a yellow informational banner with the following intended use statement that workers must read when gathering information about ethnicity or race over the phone or in person.

Read this to the individual when you ask about ethnicity and race: "I am going to ask about your ethnicity and race. You don't have to answer these questions if you don't want to. I am asking these questions to help improve our programs and make sure they do not discriminate based on ethnicity or race. Your answers will not be used to make a decision about your programs and benefits."

The yellow informational banner ~~only~~ displays when ethnicity and race have not been provided for the household member and will remain displayed on the page until both ethnicity and race questions have been answered. ~~the page can be updated. It does not display in history mode.~~ If ethnicity and race responses have been provided already for the household member, the banner will no longer display. If a new household member is added to the case, and ethnicity and race questions have not been answered, the informational banner will appear for the new household member until ethnicity and race responses have been provided. ~~workers are not required to review the prompt again unless there are new household~~

~~members reported to the case and the worker is asking about the ethnicity or race of the new household members.~~ The informational banner does not display in history mode for any household members.

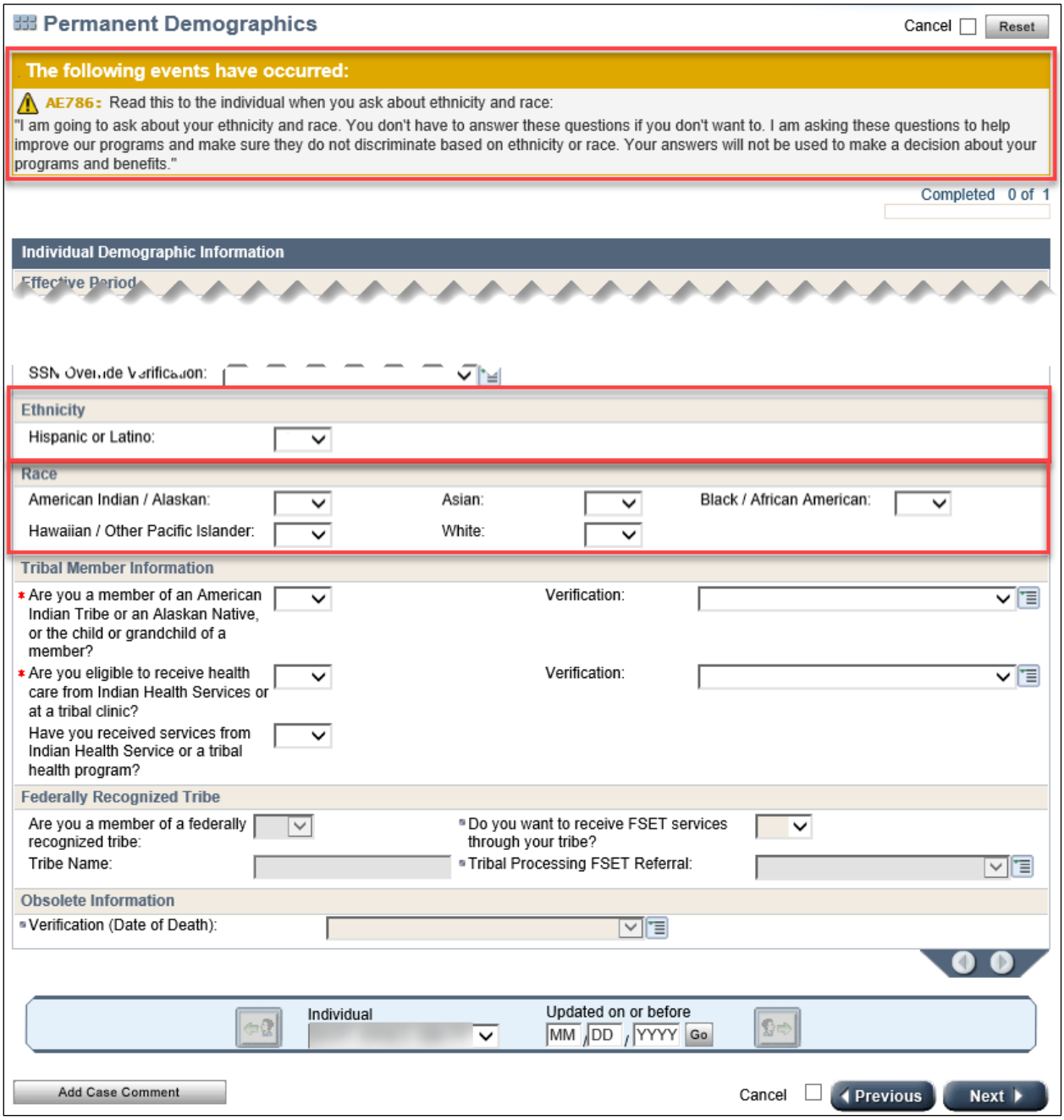


Figure 3 Permanent Demographics Page With Yellow Information Banner and Separate Sections for Ethnicity and Race

If the individual offers information regarding ethnicity (that is, “Hispanic or Latino” or “Not Hispanic or Latino”), workers can select the appropriate value from the drop-down menu. Or, if the individual does not want to provide information regarding ethnicity, workers can leave the Ethnicity field blank.

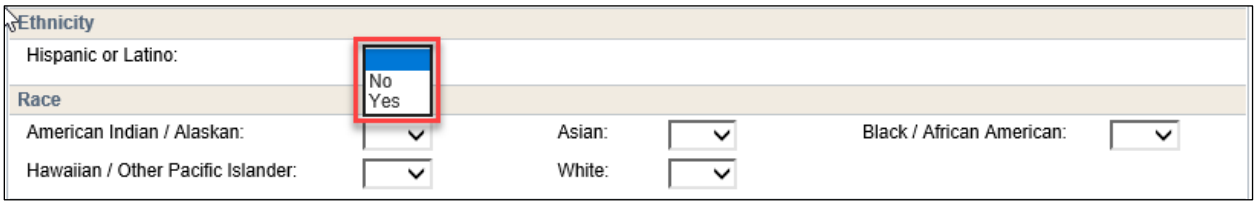


Figure 4 Ethnicity Field Drop-down Menu Options

If the individual offers information regarding race, workers can select the appropriate values from the drop-down menu. Or, if the individual does not want to provide information regarding race, workers can leave all the fields blank. Workers will still be able to navigate off the page if blanks remain in any of the ethnicity or race fields.

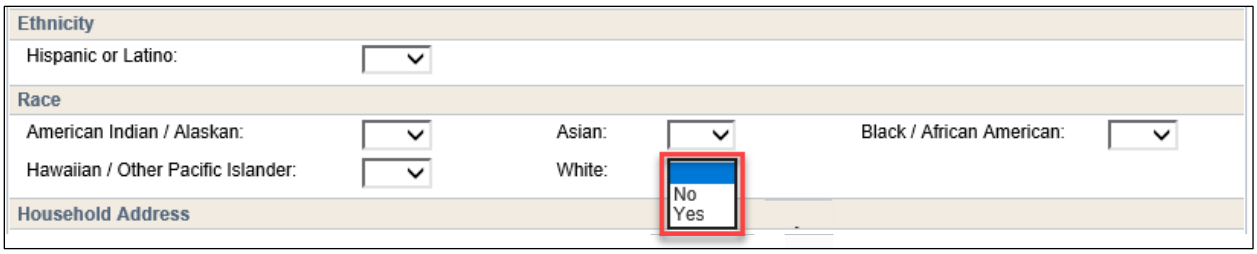


Figure 5 “Race” Section Field Drop-down Menu Options

On both pages, the option to select “Populate Unknown Responses as No” for the fields in the “Race” section will no longer be available. Also, if one or more values for race are selected on the page, workers will no longer be required to select “No” for the other fields. This update will provide more accurate data collection to tell the difference between “No” responses and blank non-responses.

INDIVIDUAL DEMOGRAPHICS SUMMARY PAGE

The Individual Demographics Summary page will display information on ethnicity and race collected on the Permanent Demographics page.

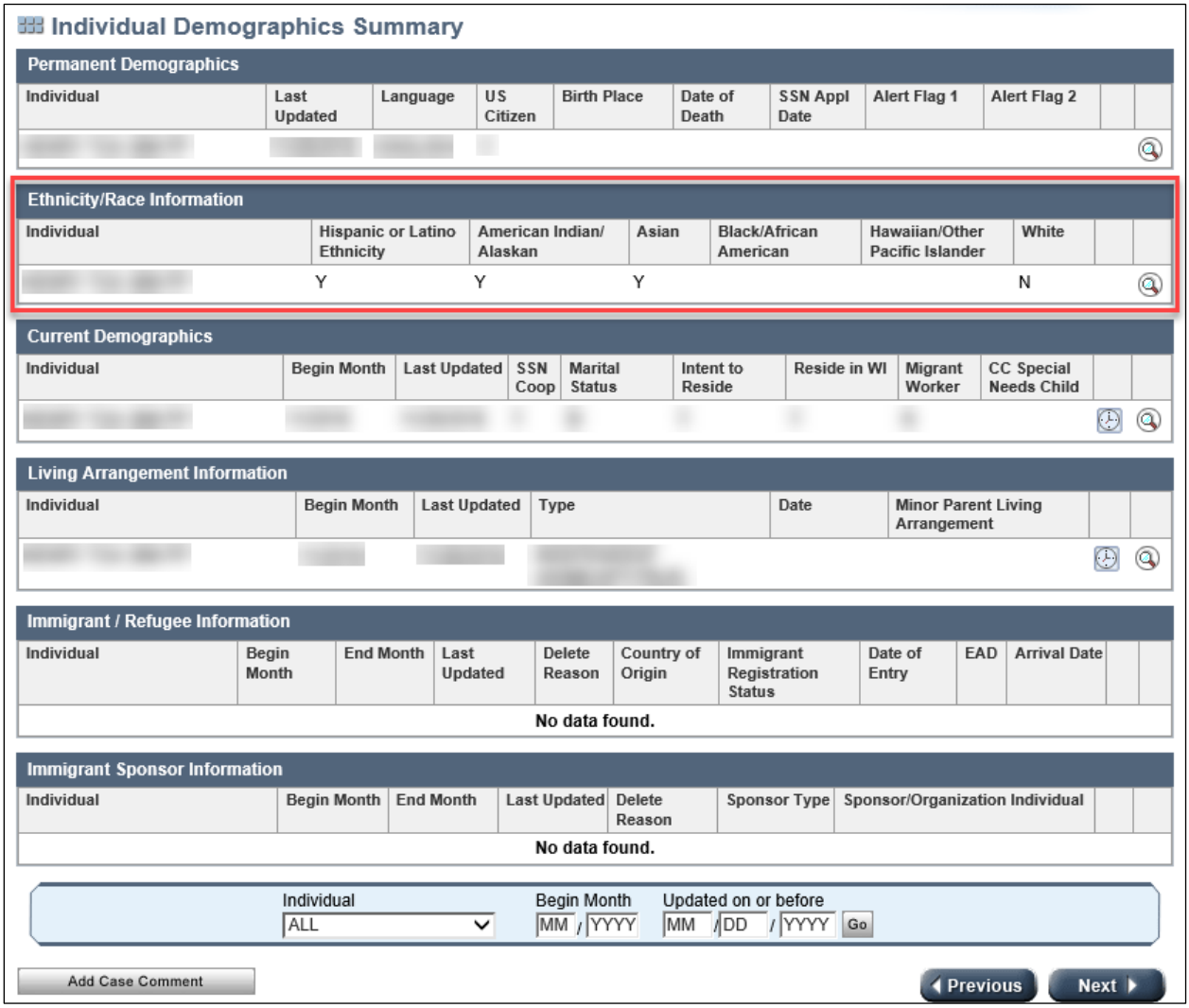
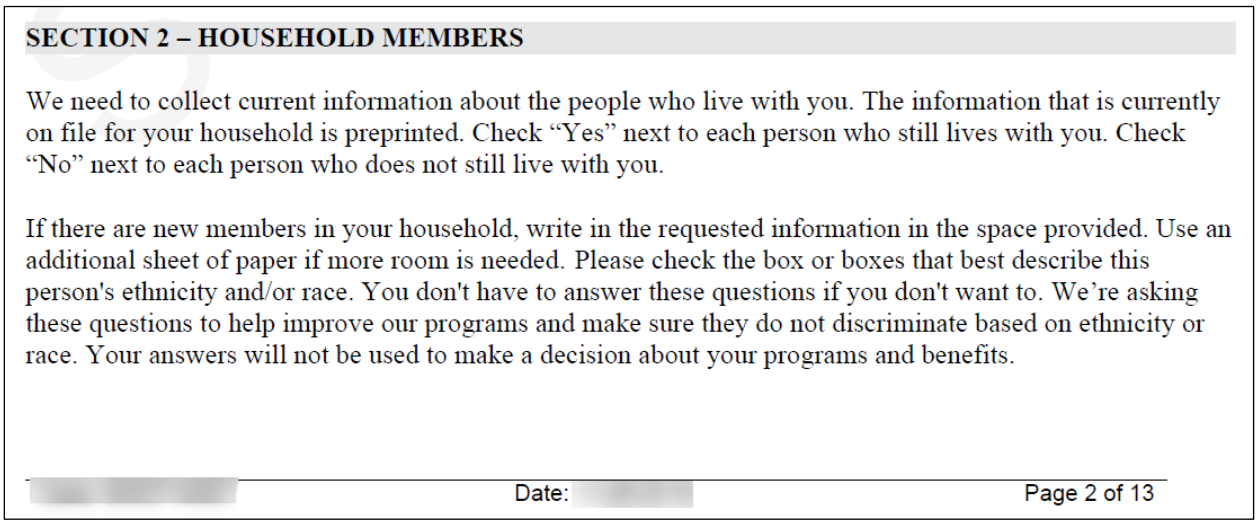


Figure 6 Individual Demographics Summary Page

CORRESPONDENCE

FOODSHARE SIX MONTH REPORT FORM

The FoodShare Six-Month Report form (SMRF), F-16076, will be updated to include the intended use statement in the instructions and to separate collection of ethnicity and race.



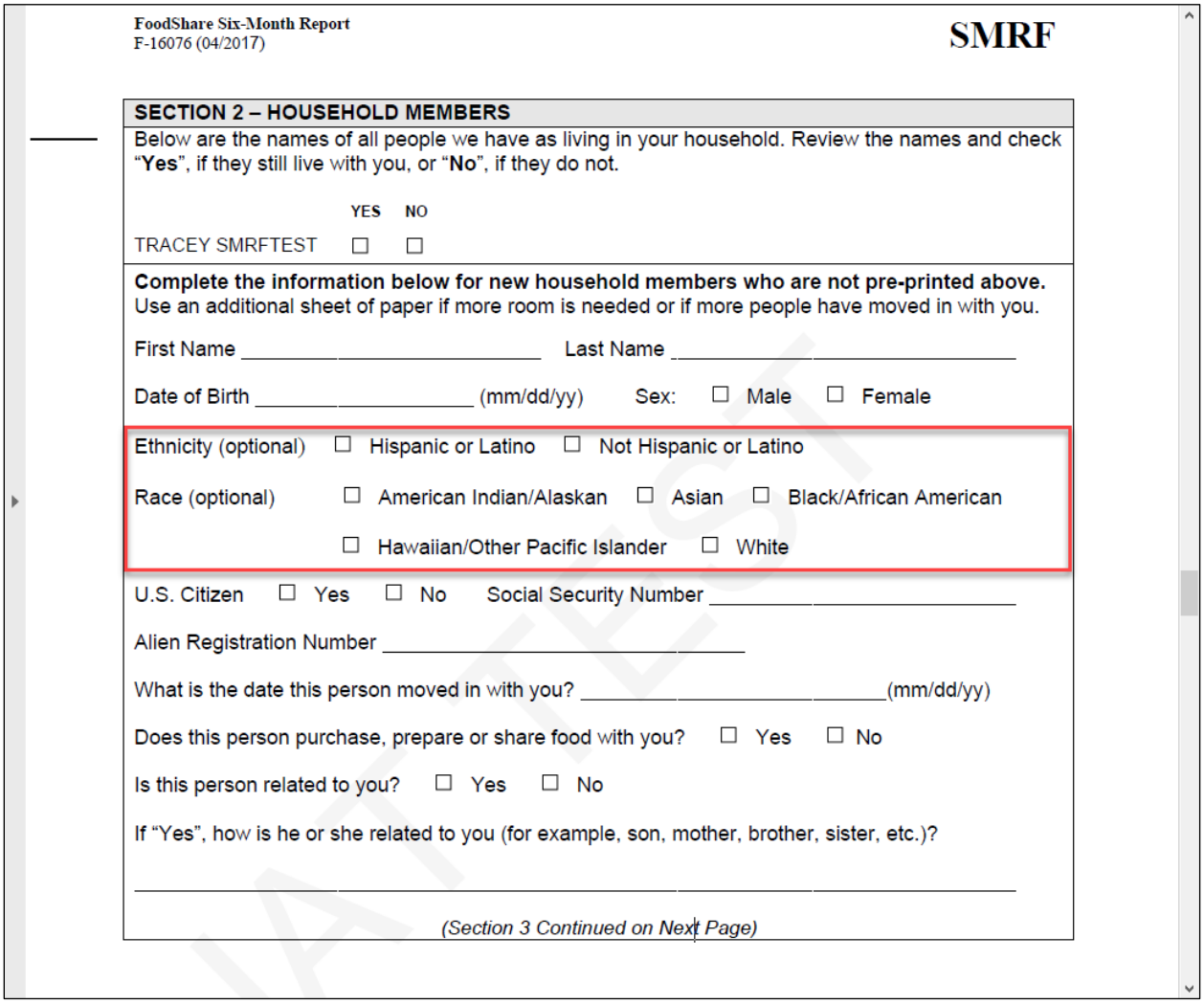
SECTION 2 – HOUSEHOLD MEMBERS

We need to collect current information about the people who live with you. The information that is currently on file for your household is preprinted. Check "Yes" next to each person who still lives with you. Check "No" next to each person who does not still live with you.

If there are new members in your household, write in the requested information in the space provided. Use an additional sheet of paper if more room is needed. Please check the box or boxes that best describe this person's ethnicity and/or race. You don't have to answer these questions if you don't want to. We're asking these questions to help improve our programs and make sure they do not discriminate based on ethnicity or race. Your answers will not be used to make a decision about your programs and benefits.

[redacted] Date: [redacted] Page 2 of 13

Figure 7 FoodShare Six-Month Report Form Instructions



FoodShare Six-Month Report
F-16076 (04/2017)

SMRF

SECTION 2 – HOUSEHOLD MEMBERS

Below are the names of all people we have as living in your household. Review the names and check "**Yes**", if they still live with you, or "**No**", if they do not.

	YES	NO
TRACEY SMRFTEST	☐	☐

Complete the information below for new household members who are not pre-printed above.
Use an additional sheet of paper if more room is needed or if more people have moved in with you.

First Name _____ Last Name _____

Date of Birth _____ (mm/dd/yy) Sex: ☐ Male ☐ Female

Ethnicity (optional) ☐ Hispanic or Latino ☐ Not Hispanic or Latino

Race (optional) ☐ American Indian/Alaskan ☐ Asian ☐ Black/African American

☐ Hawaiian/Other Pacific Islander ☐ White

U.S. Citizen ☐ Yes ☐ No Social Security Number _____

Alien Registration Number _____

What is the date this person moved in with you? _____(mm/dd/yy)

Does this person purchase, prepare or share food with you? ☐ Yes ☐ No

Is this person related to you? ☐ Yes ☐ No

If "Yes", how is he or she related to you (for example, son, mother, brother, sister, etc.)?

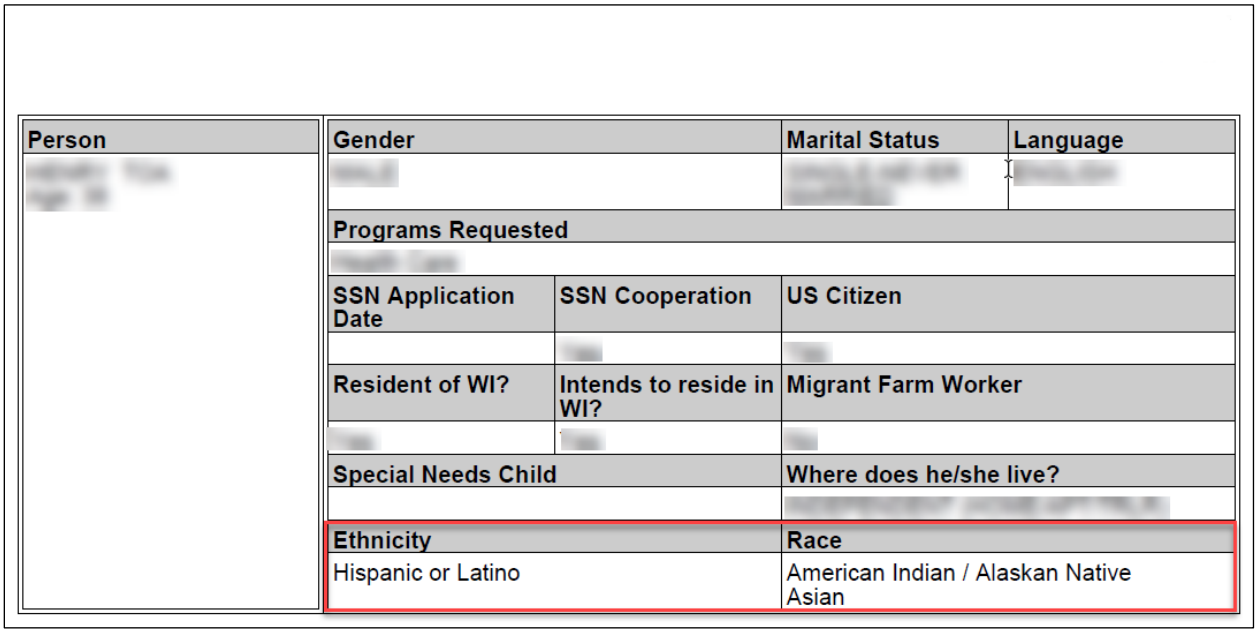
_____

(Section 3 Continued on Next Page)

Figure 8 FoodShare Six-Month Report Form

CASE SUMMARY

The Case Summary will be updated to change the order in which information is presented (first ethnicity information and then race information).



Person	Gender		Marital Status	Language
	Programs Requested			
	SSN Application Date	SSN Cooperation	US Citizen	
	Resident of WI?	Intends to reside in WI?	Migrant Farm Worker	
	Special Needs Child		Where does he/she live?	
	Ethnicity		Race	
	Hispanic or Latino		American Indian / Alaskan Native Asian	

Figure 9 Case Summary Page

All text changes in correspondence related to the questions concerning ethnicity and race will be translated for any notices or correspondence sent in Spanish. Households with Hmong as the primary language will receive their case summary translated into Hmong; any ethnicity or race information on the case summary will also be translated into Hmong.

INCOME MAINTENANCE MANAGEMENT REPORTING FOR MEMBER DEMOGRAPHICS

Two new Income Maintenance Management Report (IMMR) dashboards will be available on March 2, 2019, to provide dynamic member demographic information on eligible members and FoodShare Employment and Training (FSET) participants. The dashboard replaces the CARES Race and Ethnicity Statistics Calendar Year Report posted in the DHS CARES CASA SharePoint site.

The IM Member Demographic Dashboard will include measures on eligible members enrolled in IM programs and will be available to IMMR users. The term “eligible members” refers to individuals who were eligible for one or more programs during the reporting period.

The FSET Member Demographic Dashboard will include measures on individuals enrolled in the FSET program and will be available to FSET users of IMMR. The term “FSET participants” can refer to individuals who were enrolled in the FSET program at least one day of the reporting period. This does not include individuals who were referred and never enrolled.

The IM Member Demographic Dashboard will display specific measures of eligible members related to disability, homelessness, tribal status, and noncitizenship status. Users can filter all demographics by gender, age (adults and minors), program, consortia, county, or tribal agency. On the FSET Member

Demographic Dashboard, FSET users can sort by ABAWD status, ineligibility, gender, age, FSET region, and FSET agency.

If either dashboard is accessed through the IMMR Home Page or Search Tool, it will display measures for all eligible members or FSET participants statewide for the year to date. At the top of the page, users can select a reporting period by period type, year, and month. Period Type and Year are mandatory fields. Member demographic data in IMMR is only available back to May 2016; users cannot choose years prior to 2016, or months prior to May 2016.

For Reporting Period Type, users can select any of the following:

- State Fiscal Year to Date (July through June)
- Federal Fiscal Year to Date (October through September)
- Calendar Year to Date

Note that Calendar Year to Date will be the default setting for the Reporting Period Type.

For example, users who are seeking Member Demographic data for the 2018 state fiscal year (July 1, 2017, through June 30, 2018) should select "State Fiscal Year to Date" as the Report Period and select "2018" as the Report Year.

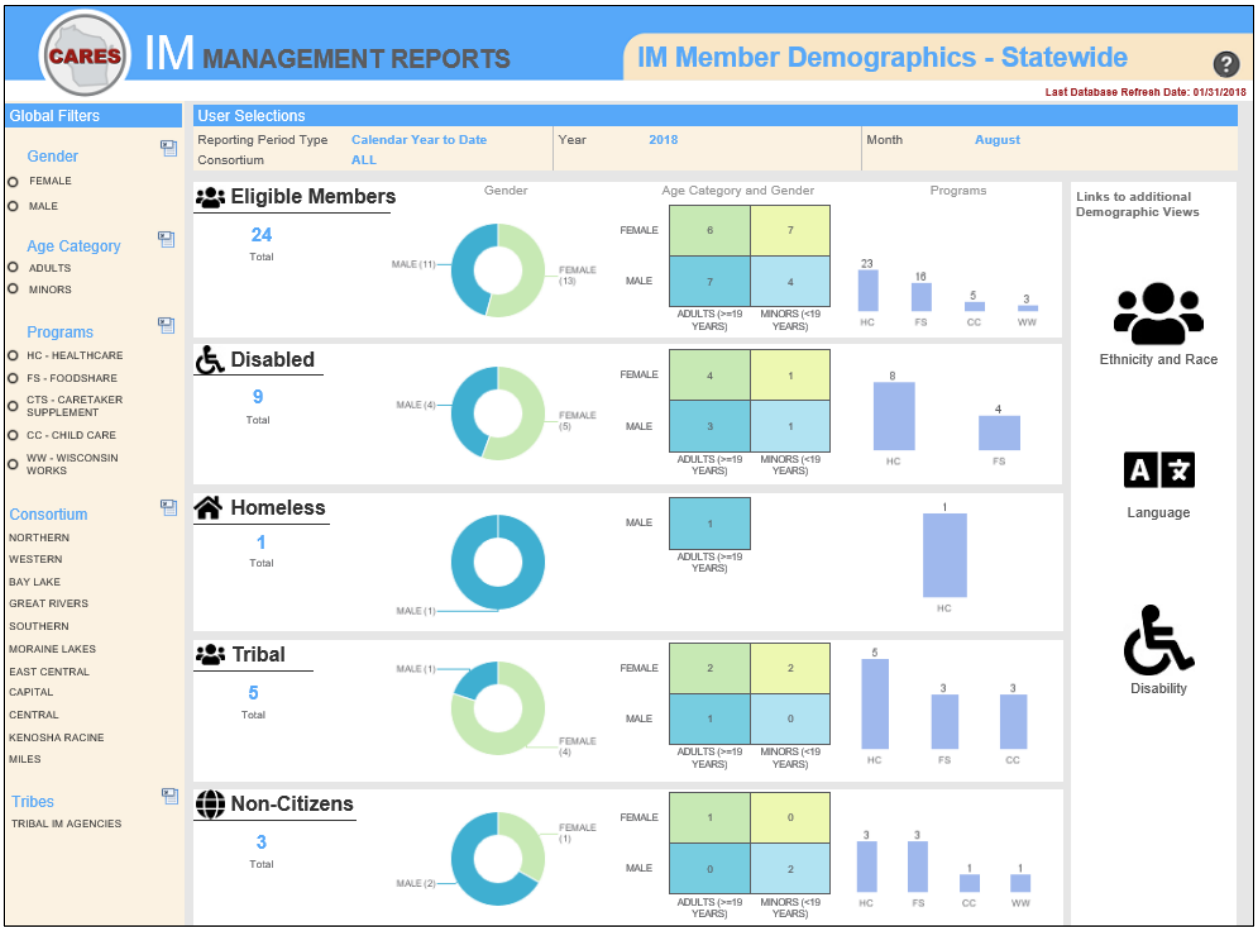


Figure 10 IM Member Demographic Dashboard Summary Page

There are additional reporting breakdowns for ethnicity and race, primary language, and disability, including breakdowns of the various categories and a heat map. Users can still apply the global filters for gender, age, program, consortia, or FSET region and agency to these reports.

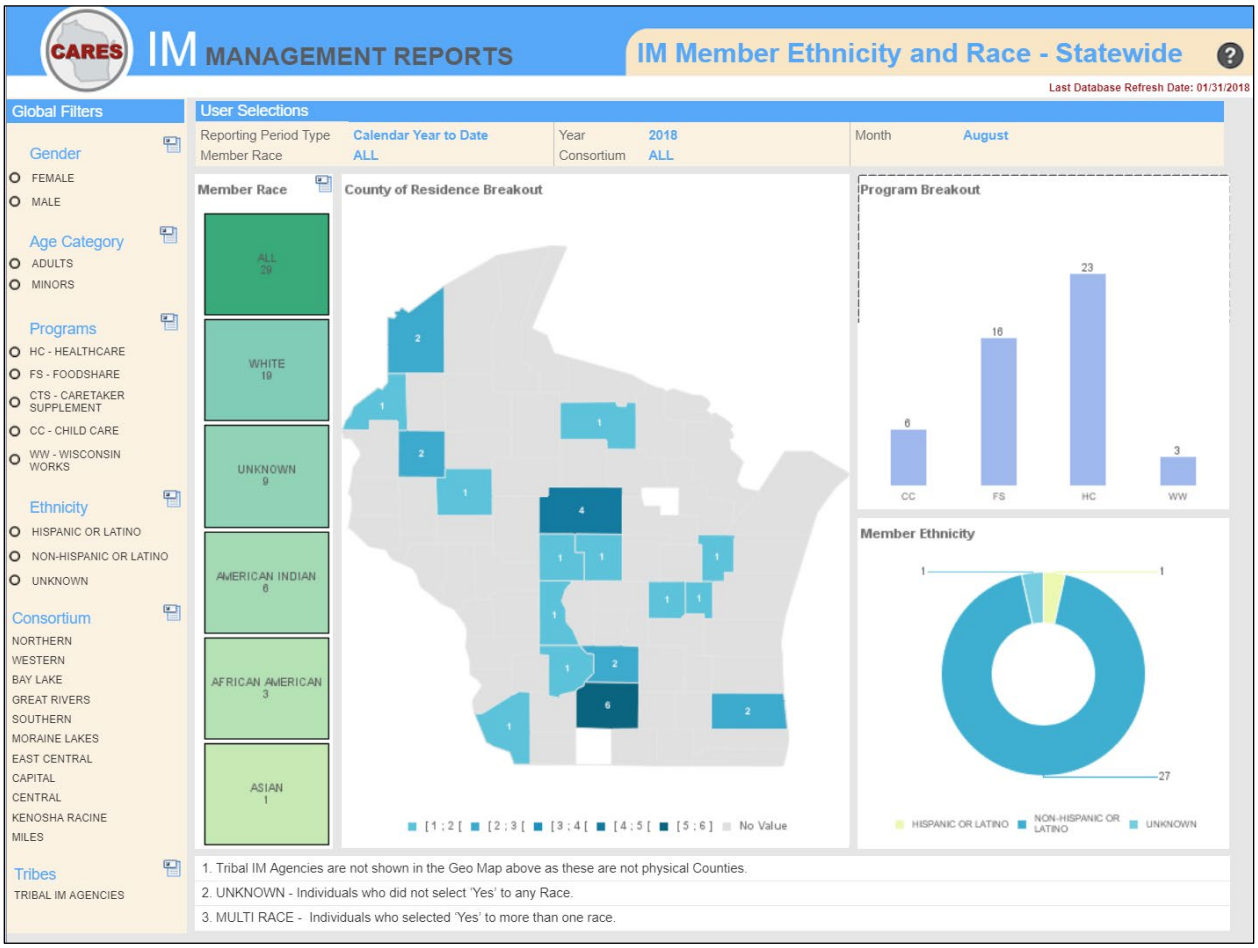


Figure 11 Ethnicity and Race Report Displayed in the IM Member Demographic Dashboard

CONTACTS

BEPS CARES Information and Problem Resolution Center

For Wisconsin Shares Child Care policy questions outside of Milwaukee County: Bureau of Regional Operations (BRO), Child Care Coordinators at broccpolicyhelpdesk@wisconsin.gov

For Child Care CARES/CWW and CSAW processing questions statewide and policy questions in Milwaukee County: Child Care Subsidy and Technical Assistance line at childcare@wisconsin.gov or 608-422-7200

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 or WWP Functionality Questions: W-2 Help Desk

DHS/DMS/BEPS/PH
DCF/DECE/BELP/KS
DCF/DFES/BWF/FO