

Transition Points Chart 2019

	When It Occurs	Importance	Action that May Be Needed	What Benefit to Work Coach Should Do	Referral to Benefit Planner Needed?
Transition Point					
For Title II					
Resolve Benefits Planning Query (BPQY) discrepancies; get accurate work incentive status and earnings record	As soon as possible	Get accurate information about work incentive status and earnings history	Review BPQY; request work review; resolve discrepancies	Review BPQY; discuss discrepancies with individual; contact Benefit Planner if necessary; request work review if appropriate; contact SSA to resolve discrepancies	Yes, if major issues with BPQY that Benefit to Work Coach can't decipher
Starting or stopping a job, or wage amounts change	When wages start, stop or change	May use Trial Work Period (TWP) months, do or not do substantial gainful activity (SGA) after TWP; may cause cash benefits to stop	Report wages or change to SSA; evaluate if wages may be SGA after TWP; consider IRWEs, subsidies & unsuccessful work attempts (UWAs), if needed	Assist person to report wages; explain to individual the likely impact of wages/change on benefit & work incentive status	Yes, if earnings may be SGA after TWP; Impairment Related Work Expenses (IRWEs) &/or subsidies need to be developed; person may

		or re-start			benefit from Freedom to Work (FTW)
End of the TWP	9 th month of gross wages at TWP level (\$880/month in 2019) within 60-month period	Month after TWP ends: 1) Social Security Administration (SSA) determines whether work is SGA 2) Person may use IRWEs, subsidies, unsuccessful work attempts (UWA's) 3) EPE begins	Report wages to SSA; evaluate if wages may be SGA after TWP; develop and document IRWEs, subsidies & UWAs, if needed	Evaluate and explain to person likely impact of continuing wages – SGA likely? IRWEs and/or subsidies needed?	Yes, if earnings may be SGA after TWP; IRWEs &/or subsidies need to be developed; person may benefit from Freedom to Work
Having gross wages go above or below SGA level after the TWP	When gross wages go above/below \$1,220/month or \$2,040/month if blind (in 2019)	May cause cash benefit to stop after grace period or re-start if stopped; may need to consider IRWEs, subsidies, UWAs	Report wages to SSA; evaluate if wages may be SGA after TWP; develop/document IRWEs, subsidies & UWAs, if needed; request benefits be re-started if they drop below SGA	Evaluate likely impact on cash benefits – use grace period? Pause or re-start benefits? Use IRWEs, subsidies, UWAs if needed?	Yes, if earnings may be SGA after TWP; IRWEs &/or subsidies &/or UWAs need to be developed; person may benefit from Freedom to Work
Identifying/documenting possible IRWEs, subsidies	When gross wages are at or above	Can keep wages below SGA and	Refer to Benefits Planner to identify/document	Refer to Benefit Planner; possibly help Benefit	Yes

	\$1,220/month or \$2,040/month if blind (in 2019) shortly before or any time after TWP ends	continue cash benefits after TWP	possible IRWEs, subsidies	Planner to identify IRWEs and subsidies	
Having countable wages (after subtracting IRWEs and subsidies) go above or below SGA level after the TWP	When gross wages, after subtracting IRWEs and subsidies, go above or below \$1,220/month or \$2,040/month if blind (in 2019) after TWP	May cause cash benefits to stop or be re-started	Report wages, IRWEs and subsidies to SSA; don't spend cash benefits if countable wages reach SGA and cash benefits continue after they should have stopped (to repay overpayment); follow up with SSA to re-start cash benefits if they have already stopped but countable wages have later dropped below SGA	Refer to Benefit Planner	Yes
First month countable wages reach SGA after the TWP and two consecutive months	When gross wages, after subtracting IRWEs and	Cash benefit should pause	Report wages to SSA; request that cash benefit stop; save cash	Refer to Benefit Planner	Yes

that follow (cessation month and grace period)	subsidies, are at or above \$1,220/month or \$2,040/month if blind (in 2019) following grace period		benefits if they continue (to repay overpayment)		
End of extended period of eligibility (EPE)	If countable wages at SGA level after EPE and grace period, cash benefits terminated	If cash benefit terminated due to SGA, and countable wages later drop below SGA, must request Expedited Reinstatement (ExR) or reapply to get benefit back	Alert individual of termination if countable wages at SGA level after EPE and grace period	Explain to individual. If countable wages at SGA level, refer to Benefit Planner.	Yes, if countable wages at SGA level.
Benefit termination month (first month countable wages reach SGA after EPE and grace period)	When countable wages reach SGA after EPE and grace period	If cash benefit terminated due to SGA, and countable wages later drop below SGA, must request ExR or reapply to get benefits back	Alert individual of termination; option to request ExR or file new application if countable wages later drop below SGA	Refer to Benefit Planner	Yes
Countable earnings	When	May request	Report wages;	Refer to Benefit	Yes

drop below SGA or stop within 5 years of benefit termination due to SGA	countable earnings drop below SGA within 60 months of benefit termination due to SGA	ExR to get cash benefit back (and Medicare, if it has stopped)	notify individual of option to request ExR	Planner	
Five years after benefit termination month due to SGA (usual deadline for requesting expedited reinstatement (ExR))	60 months after benefit termination month due to SGA	If countable earnings drop below SGA after this point, must reapply to get cash benefit back; can't use ExR	Alert individual	Refer to Benefit Planner	Yes
Submit/obtain approval for Plan for Achieving Self Support (PASS) and subsequent PASS reviews	When PASS submitted, approved, or reviewed by SSA PASS Specialist	May qualify person for SSI (or increased SSI, for concurrent beneficiary); helps offset expenses to reach work goal	Help individual develop and submit Plan to Achieve Self Support (PASS), negotiate for approval, complete periodic reviews for approved PASS, modify PASS if needed	Briefly explain PASS to individual; refer to Benefit Planner	Yes
Person has overpayment or underpayment	When person either receives letter from SSA indicating overpayment	Overpayment must be appealed, waived or repaid.	For overpayment - May need to report wages & work incentives to SSA; request	Notify individual. Refer to Benefit Planner	Yes

	or underpayment, OR person appears to have been overpaid or underpaid based on wages and work incentive status	Underpayment means SSA owes person past-due cash benefits.	reconsideration; request waiver of overpayment; and/or arrange repayment plan. For underpayment – Contact SSA to request past-due benefits.		
Work continuing disability reviews (CDRs) and SGA determinations	When SSA informs the individual of a work review	May determine work incentive status and whether benefits will continue	Complete work review forms and submit with pay stubs and documentation of work incentive use (if applicable)	Assist person to complete forms SSA has sent and return with pay stubs	Yes, if person uses or requests IRWEs, subsidies and/or UWAs
Becoming entitled to another Title II benefit (e.g., Childhood Disability Beneficiary (CDB) works long enough to obtain insured status for Social Security Disability Insurance (SSDI))	When individual, parent or deceased spouse has earned enough (and paid Social Security taxes on earnings) to achieve insured status, and other criteria met (for CDB -	May qualify person for additional cash benefit	Contact SSA about potential eligibility; apply for benefit	Assist person to contact SSA and possibly apply for benefit	Yes, if assistance needed

	parent entitled to SSDI, SS Retirement or deceased; individual at least age 18 and disabled before age 22; for Disabled Widow(er)'s Benefit (DWB) – individual aged 50 or older and became eligible for DWB before age 60)				
SSDI beneficiary reaches age for possible early retirement (age 62) or full retirement age (currently age 66)	Person reaches age 62 or full retirement age (currently 66)	Person may qualify for SS early retirement or full retirement	Possibly apply for reduced early retirement or full retirement benefit	Ask Benefit Planner if action needed	Yes
Marriage of a CDB to a person who does not receive Title II benefits	Upon marriage	If person marries a spouse who is not entitled to a Social Security benefit, CDB eligibility ends. NOTE: If spouse is	Notify SSA of marriage	Alert person before marriage of consequences for CDB	Yes, if person has questions

		eligible for only SSI, not Social Security benefits, CDB eligibility ends.			
Medical Continuing Disability Review (CDR)	When informed by SSA	If person found to be medically improved, cash benefits and Medicare may be terminated	Complete medical CDR	Describe medical CDR process to person	Yes, if person needs assistance
Medical CDR finds person has medically improved	When informed by SSA	Cash benefits and Medicare may be terminated	Possibly appeal unfavorable decision; may request "statutory benefit continuation" for benefits to continue pending result of appeal (but may have overpayment if appeal is lost); may request Section 301 to continue benefits temporarily while participating in a VR or similar program	Advise person of options	Yes, if person needs assistance
For SSI					
Resolve BPQY	As soon as	Get accurate	Review BPQY;	Review BPQY;	Yes, if major

discrepancies; get accurate work incentive status and earnings record	possible	information about work incentive status and earnings history	request work review; resolve discrepancies	discuss discrepancies with individual; contact Benefits Planner if necessary; request work review if appropriate; contact SSA to resolve discrepancies	issues with BPQY that Benefit to Work Coach can't decipher
When wages start, change, or stop	When wages start, change or stop	SSI payment amount usually changes	Report wages and possibly work incentive use to SSA	Assist person to report wages; explain to individual the likely impact of wages/change on SSI payment amount & work incentive status	Yes, if person may be using specialized work incentives (Student Earned Income Exclusion (SEIE), IRWE, Blind Work Expense (BWE), PASS) or if help needed with 1619(b)
When unearned income starts, changes or stops	When unearned income starts, changes or stops	SSI payment amount usually changes	Report income change to SSA	Assist person to report income change; explain to individual the likely impact of the change on SSI payment amount; possibly discuss option to	Yes, if person may want to use PASS

				use PASS	
When wages reach the “break even” point – the point when countable income reduces the SSI payment to \$0	When wages increase enough to reduce SSI payment to \$0	May qualify for 1619(b). SSP eligibility stops.	Report wages to SSA; ensure 1619(b) status; report wages to DHHS	Assist person to report wages & verify 1619(b) status with SSA; advise person to report wages to DHHS	Yes, if help needed with 1619(b)
When wages fall below the “break even” point	When wages fall below the break-even point	SSI payments may be re-started; SSP may be re-started	Report wages to SSA; ensure SSI payments re-start; report wages to DHHS; ensure SSP re-starts	Assist person to report wages to SSA, DHHS; ensure SSI and SSP payments re-start	No
When wages reach the usual 1619(b) state threshold (\$36,552 in Michigan in 2019)	When wages reach level that would equal \$36,552 per year	1619(b) status may end, unless person qualifies for individualized 1619(b) threshold	Report wages to SSA; evaluate whether person may qualify for higher individualized threshold; request individualized threshold	Assist person to report wages	Yes, if person may want to request individualized threshold
When student status changes – become a student under age 22 who regularly attends school or job training, stop regular attendance, or reach age 22	When student status changes	Person may become eligible or ineligible for Student Earned Income Exclusion (SEIE)	Request SEIE from SSA and verify eligibility	Refer to Benefit Planner	Yes
When person starts paying for expenses	When possible impairment	Person may become eligible	Request IRWE’s from SSA, change	Refer to Benefit Planner	Yes

related to work and disability/other medical condition, or these expense amounts change or stop	related work expenses (IRWE's) start, change or stop	to use IRWE, IRWE amounts may change, or IRWE's may stop	in IRWE amounts or stop IRWE's and document IRWE's or changes		
When person begins to meet SSA definition of statutory blindness	When vision meets statutory blindness definition	Person may become eligible to use Blind Work Expenses (BWE's)	Send documentation of blindness to SSA and request medical CDR, if person has wages	Refer to Benefit Planner to assist person to document blindness and request medical CDR	Yes
When blind person starts paying for work-related expenses, or these expense amounts change or stop	When blind person starts paying for work-related expenses, expense amounts change or stop	Person may become eligible to use BWEs, BWE amounts may change, or BWEs may stop	Request BWEs from SSA, change in BWE amounts or stop BWEs and document BWEs or changes	Refer to Benefit Planner	Yes
Prepare, submit/obtain approval for, or modify Plan for Achieving Self Support (PASS) and subsequent PASS reviews	When PASS prepared, submitted, approved, modified or reviewed	Provides higher SSI payments than without PASS; enables person to pay for expenses to reach work goal	Prepare, submit/obtain approval for, modify PASS or comply with PASS reviews	Refer to Benefit Planner	Yes
Benefit termination month (e.g., 12 months after earnings exceed 1619(b) threshold)	When person's SSI eligibility has stopped (for reasons other than medical	SSI/1619(b) eligibility terminates; must request ExR or reapply to get benefits	Alert individual of termination; option to request ExR or file new application if termination	Explain benefit termination to person	Yes, if assistance needed

	improvement) for 12 consecutive months	back	resulted from earnings and countable wages later drop below SGA		
Countable earnings drop below SGA or stop within 5 years of benefit termination due to wages	When countable earnings drop below SGA within 60 months of benefit termination due to wages	May request ExR to get SSI payment or 1619(b) status back (and Medicaid, if it has stopped)	Request ExR, if desired	Refer to Benefit Planner	Yes
Five years after benefit termination month due to wages (usual deadline for requesting expedited reinstatement (ExR))	60 months after benefit termination month due to earnings over 1619(b) threshold or individualized threshold	If countable earnings drop below SGA after this point, must reapply to get cash benefit back; can't use ExR	Alert individual	Refer to Benefit Planner	Yes
Person has overpayment or underpayment	When person either receives letter from SSA indicating overpayment or underpayment, OR person appears to have been	Overpayment must be appealed, waived or repaid. Underpayment means SSA owes person past-due cash benefits.	For overpayment - May need to report wages & work incentives to SSA; request reconsideration; request waiver of overpayment; and/or arrange repayment plan.	Notify individual. Refer to Benefits Planner.	Yes

	overpaid or underpaid based on wages and work incentive status		For underpayment – Contact SSA to request past-due benefits.		
Work continuing disability reviews (CDR's)	When SSA informs the individual of a work review	May determine whether SSI will continue and SSI payment amounts	Complete work review forms and submit with pay stubs and documentation of work incentive use (if applicable)	Assist person to complete forms SSA has sent and return with pay stubs	Yes, if person uses or requests SEIE, IRWE, BWE, PASS, or needs assistance with 1619(b)
Living arrangements change	When person moves to different type of living arrangement	May cause change in SSI payment amount due to start, change or stop in food and shelter provided by another party (“in-kind support and maintenance”, or ISM)	Report change in living arrangement to SSA; verify payments person and/or others make for person’s food and shelter	Refer to Benefit Planner	Yes
Becoming entitled to a Title II benefit (SSDI, CDB or DWB)	When individual, parent or deceased spouse has earned enough (and paid Social	May qualify person for SSDI, CDB or DWB, or concurrent benefits (Title II and SSI)	Contact SSA about potential eligibility; apply for benefit	Assist person to contact SSA and possibly apply for benefit	Yes, if assistance needed

	Security taxes on earnings) to achieve insured status, and other criteria met (for CDB - parent entitled to SSDI, SS Retirement or deceased; individual at least age 18 and disabled before age 22; for DWB – individual aged 50 or older and became eligible before age 60)				
When countable resources get close to \$2,000 (\$3,000 for a married couple)	When countable resources get close to \$2,000 (\$3,000 for a married couple)	May need to convert resources to a form that doesn't count (such as depositing to ABLE account) to continue SSI or 1619(b) eligibility	Spend excess resources or convert to a form that doesn't count (such as depositing into ABLE account)	Advise individual about ABLE accounts and other excluded resources	Yes, if assistance needed
Marriage or divorce	When person	May affect	Report change in	Refer to Benefit	Yes

	announces plan to marry or divorce	eligibility for or amount of SSI payment due to spouse-to-spouse deeming starting or stopping, reduced maximum SSI payment for married spouses (150% of individual benefit, rather than 200%)	marital status to SSA; report spouse's income and resources	Planner to advise about impact of marriage or divorce on SSI eligibility and payment amount	
Medical CDR	When informed by SSA	If person found to be medically improved, SSI and Medicaid may be terminated	Complete medical CDR	Describe medical CDR process to person	Yes, if person needs assistance
Medical CDR finds person has medically improved	When informed by SSA	SSI and Medicaid may be terminated	Possibly appeal unfavorable decision; may request "statutory benefit continuation" for benefits to continue pending result of appeal (but may have overpayment if	Advise person of options	Yes, if person needs assistance

			appeal is lost); may request Section 301 to continue benefits temporarily while participating in a VR or similar program		
<u>For Medicare and Medicaid</u>					
End of extended period of Medicare coverage (at least 93 months after TWP ends)	If Title II payments stop due to SGA, at least 93 months after TWP, but may be longer	May need to pay Part A premium to continue Medicare coverage	Explore possible eligibility for Qualified Disabled and Working Individuals (QDWI) program to cover Part A premium; apply to Michigan Department of Health and Human Services (DHHS) for QDWI if likely eligible; if not eligible for QDWI, then budget for Part A premiums	Assist person to estimate eligibility for QDWI & apply to DHHS for QDWI; prepare to pay Part A premium if ineligible for QDWI or Medicaid. Refer to Benefit Planner	Yes
When countable income or resources go above or below limits for form of Medicaid	When countable income or resources go	May need to apply for different form of Medicaid if	Apply for different form of Medicaid; convert resources to a noncountable	Assist person to apply for different form of Medicaid; reduce countable	Yes, if assistance needed

person receives or might be eligible for	above or below limits for form of Medicaid person receives or might be eligible for	current eligibility stops; or reduce countable resources and/or income to continue Medicaid	form (e.g., contribute to ABLE account); reduce countable income; report to DHHS or SSA.	income/resources; report to DHHS or SSA.	
When countable income or resources go above or below limits for Medicare Savings Program (MSP) person receives or might be eligible for	When countable income or resources go above or below limits for MSP person receives or might be eligible for	If income or resources exceed limits for one MSP, consider whether person may be eligible for another MSP or consider whether certain actions could protect eligibility (e.g., contribute excess resources to ABLE account); if ineligible, may need to pay more for Medicare expenses. If income or resources fall below limits, may apply for	Evaluate eligibility for a different MSP, if appropriate; take action to reduce countable income or resources, if possible; apply to DHHS for MSP or different MSP, if likely eligible.	Assist person to estimate MSP eligibility, reduce countable income/resources, apply to DHHS for MSP or different MSP; report to DHHS	Yes, if assistance needed

		MSP.			
When person may benefit from Freedom to Work (FTW)	When eligibility for another form of Medicaid ends, and/or person becomes eligible for FTW.	May be able to retain or establish Medicaid eligibility	Apply to DHHS for FTW, if potentially eligible	Assist person to estimate FTW eligibility & apply to DHHS for FTW	Yes, if assistance needed