

# Reporting Wages and Work Incentive Use

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# Learning Objectives

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1. List 3 reasons to report wages and work incentive use
2. Describe when, how often and how to report wages for Title II, Supplemental Security Income (SSI) and Michigan Department of Health and Human Services (DHHS) benefits
3. Identify when, how often and how to report work incentive use for Title II and SSI
4. Report how to save documents related to wages and work incentive use
5. Explain how to deal with overpayments
6. Define a Benefit to Work Coach's role regarding reporting wages and work incentive use

# Why Do Wages and Work Incentive Use Need to Be Reported?

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Reporting wages and work incentives is likely the most important thing a person on benefits can do while working.

# 3 Excellent Reasons to Report Wages and Work Incentive Use:

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## 1. To help prevent overpayments

Agencies that provide benefits much more likely to adjust benefits when appropriate

## 2. To help prevent underpayments

If person reports when wages decrease or stop, and when s/he uses work incentives, s/he is much more likely to have benefits increased or re-started.

# 3 Excellent Reasons to Report Wages and Work Incentive Use:

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## 3. To help people get overpayments waived by Social Security

Even when people report their wages, they often still get overpaid.

However, overpayments can sometimes be waived (forgiven) by Social Security. To get an overpayment waived, the person must show that:

- The overpayment was not his or her fault, AND
- S/he could not afford to repay the overpayment, even a little at a time, because s/he needs all his/her income to pay for basic living expenses.

# 3 Excellent Reasons to Report Wages and Work Incentive Use:

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## 3. To help people get overpayments waived by Social Security (Continued)

A person who reports wages is often determined to not be at fault for an overpayment.

A person who does not report wages is usually found to be at fault for an overpayment.

A person must usually report wages in order to have a chance of having any overpayments waived.

# When and How Often Should Wages Be Reported?

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## For Title II

The person should report wages in months when:

1. Starting a new job
2. Stopping a job
3. Gross wages are high enough to use Trial Work Period (TWP) months (\$880/month in 2019) until all 9 TWP months have been used

# When and How Often Should Wages Be Reported?

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## For Title II (Continued)

The person should report wages in months when:

4. After the TWP, when gross wages first reach Substantial Gainful Activity (SGA) level (\$1,220/month if non-blind, \$2,040/month if blind in 2019). The person should also report work incentives if they may keep countable wages below SGA.
5. After the TWP, when countable wages (after subtracting work incentives) go above or below SGA. The person should also report work incentives if they may keep countable wages below SGA.

# When and How Often Should Wages Be Reported?

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## For Title II (Continued)

NOTE: Wages do NOT need to be reported every month for Title II, but when a person does report, s/he should report wages for all months since the last time s/he reported. Many people who get Title II benefits report wages monthly just to be safe.

When a person's earnings may affect his/her Title II benefits or work incentive status (e.g., use TWP months, perform SGA after TWP), s/he should request a work review from SSA.

To request a work review:

1. Call local SSA office or 1-800-772-1213, or
2. Send a letter to local SSA office representative, or
3. Visit local SSA office

# When and How Often Should Wages Be Reported?

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## For SSI

If the person starts, continues or stops work in a month, s/he should report wages. This means a working person must usually report wages every month.

# When and How Often Should Wages Be Reported?

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## For DHHS Benefits

The person should report wages whenever s/he:

1. Starts a new job,
2. Stops a job,
3. Changes employers,
4. Changes work hours by more than 5 hours a week, or
5. Changes his/her hourly wage

The wages or wage change should be reported **within 10 days of getting the first payment** of different wage amount (first paycheck for new job, first paycheck with increased or decreased wage amount for changed work hours or changed hourly wage, last paycheck when job stops).

# When and How Often Should Wages Be Reported?

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## Exercises:

1. Ariana receives SSDI and used her 9<sup>th</sup> TWP month a year ago. Since then, her gross wages had been below SGA every month until this month. She reported her wages when her EPE started. She just got more hours, boosting her gross wage to \$1,300 this month. She has some possible IRWE's and subsidies.

Should Ariana report her earnings for this month to SSA?

Should she request a work review?

# When and How Often Should Wages Be Reported?

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## Exercises:

1. Ariana receives SSDI and used her 9<sup>th</sup> TWP month a year ago. Since then, her gross wages had been below SGA every month until this month. She reported her wages when her EPE started. She just got more hours, boosting her gross wage to \$1,300 this month. She has some possible IRWE's and subsidies.

Should Ariana report her earnings for this month to SSA? **Yes**

Should she request a work review? **Yes**

# When and How Often Should Wages Be Reported?

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## Exercises:

2. Giuseppe receives CDB and used his 9<sup>th</sup> TWP month 6 months ago. Since then, his gross wages had been about \$867 per month. He reported his earnings when his EPE started. He just got a raise and earned \$952 this month.

Does Giuseppe need to report his earnings for this month to SSA?

Should he request a work review?

# When and How Often Should Wages Be Reported?

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## Exercises:

2. Giuseppe receives CDB and used his 9<sup>th</sup> TWP month 6 months ago. Since then, his gross wages had been about \$867 per month. He reported his earnings when his EPE started. He just got a raise and earned \$952 this month.

Does Giuseppe need to report his earnings for this month to SSA? **No**

Should he request a work review? **No**

# When and How Often Should Wages Be Reported?

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## Exercises:

3. Ingrid receives SSDI and has used 8 TWP months. She reported her earnings for her 8<sup>th</sup> TWP month, which was 4 months ago. Since then, her gross wages had been about \$600 per month. She just got more hours and earned \$952 this month.

Should Ingrid report her earnings for this month to SSA?

Should she request a work review?

# When and How Often Should Wages Be Reported?

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## Exercises:

3. Ingrid receives SSDI and has used 8 TWP months. She reported her earnings for her 8<sup>th</sup> TWP month, which was 4 months ago. Since then, her gross wages had been about \$600 per month. She just got more hours and earned \$952 this month.

Should Ingrid report her earnings for this month to SSA? **Yes**

Should she request a work review? **Yes**

# When and How Often Should Wages Be Reported?

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## Exercises:

4. Ralph receives SSI. He started a job last month earning \$867 per month and reported his wages. He earned the same amount this month.

Should Ralph report his earnings for this month to SSA?

# When and How Often Should Wages Be Reported?

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## Exercises:

4. Ralph receives SSI. He started a job last month earning \$867 per month and reported his wages. He earned the same amount this month.

Should Ralph report his earnings for this month to SSA? **Yes**

# When and How Often Should Wages Be Reported?

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## Exercises:

5. Jessica receives SSDI and a Medicare Savings Program. She started a job a year ago earning \$1,083 per month and reported it to DHHS and SSA (SSA did a work review after Jessica's TWP ended). Her earnings stayed the same until this month, when her hourly wage increased. Her gross wage this month was \$1,191.

Should Jessica report her earnings for this month to DHHS?

If so, how soon should she report the raise to DHHS?

Does she need to report her earnings for this month to SSA?

# When and How Often Should Wages Be Reported?

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## Exercises:

5. Jessica receives SSDI and a Medicare Savings Program. She started a job a year ago earning \$1,083 per month and reported it to DHHS and SSA (SSA did a work review after Jessica's TWP ended). Her earnings stayed the same until this month, when her hourly wage increased. Her gross wage this month was \$1,191.

Should Jessica report her earnings for this month to DHHS? **Yes**

If so, how soon should she report the raise to DHHS? **Within 10 days after receiving the first paycheck reflecting the raise**

Does she need to report her earnings for this month to SSA? **No**

# How Should Wages Be Reported?

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The individual or representative payee should report wages.

A Benefit to Work Coach or Benefit Planner should teach the person when and how to report wages, but the Coach or Planner is NOT responsible for actually reporting wages.

The Coach or Planner should follow up with the individual or representative payee to make sure that benefits are adjusted when they should be.

# How Should Wages Be Reported?

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## For Title II

A person who gets Title II benefits can report wages by:

1. Calling Social Security at 1-800-772-1213 or local office (only for first report when job starts)
2. Mailing, delivering or (if SSA recommends) faxing pay stubs to local Social Security office (NOTE: Pay stubs are only required during a work review, but they help verify wages accurately, so a person can submit pay stubs to document wage changes between work reviews.)
3. Using myWageReport through My Social Security account (NOT for first report when job starts)

# How Should Wages Be Reported?

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## For SSI

A person who gets SSI can report wages by:

1. Calling Social Security at 1-800-772-1213 or local office (only for first report when job starts)
2. Mailing, delivering or (if SSA recommends) faxing pay stubs to local Social Security office
3. Using myWageReport through My Social Security account (NOT for first report when job starts)
4. Using SSI telephone wage reporting (NOT for first report)
5. Using SSI mobile wage reporting (NOT for first report)

NOTE: A person who receives both Title II and SSI benefits (known as a “concurrent beneficiary”) must usually report wages separately for each benefit, UNLESS s/he uses myWageReport.

# How Should Wages Be Reported?

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## For DHHS Benefits

1. Using MI Bridges system on line or by phone
2. Calling DHHS Caseworker
3. Using Change Report Form (DHS 2440)
4. Reporting in person at local DHHS office

# Details About Wage Reporting Methods

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**Whenever a person reports wages, s/he should request a receipt to prove s/he reported.**

Receipts can help the person get overpayments waived if the benefit agency later claims they did not receive wage reports.

# Details About Wage Reporting Methods

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## For Title II and SSI

Calling 1-800-772-1213 or local SSA office – Title II, SSI or Both

Only for reporting new job for first time

# Details About Wage Reporting Methods

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## For Title II and SSI

### Reporting with myWageReport through My Social Security Account – Title II, SSI or Both

Can't report for first time in a job using myWageReport. Must use another method first (calling 1-800-772-1213 or local SSA office, submitting pay stubs).

Need to open My Social Security account. Go to <https://www.ssa.gov/myaccount/> and follow the instructions.

A concurrent beneficiary can report wages for both Title II and SSI using myWageReport, and does not need to report wages separately for each benefit.

See “Details About Wage Reporting Methods for SSDI and SSI Factsheet” for more details.

# Details About Wage Reporting Methods

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## For Title II and SSI

### Reporting Wages by Submitting Pay Stubs – Title II, SSI or Both

A person can submit pay stubs to report wages any time s/he reports- the first time and any time afterward.

The individual can submit pay stubs by delivering them in person, by fax (if SSA recommends) or by mail.

See “Details About Wage Reporting Methods for SSDI and SSI Factsheet” for more details.

# Details About Wage Reporting Methods

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## For SSI

### SSI Telephone or Mobile Wage Reporting – SSI Only

Lets a person report wages electronically through either a dedicated toll-free line or a mobile app on an Apple or Android device

# Details About Wage Reporting Methods

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## For SSI

### SSI Telephone or Mobile Wage Reporting – SSI Only

#### Who CAN'T Use Telephone or Mobile Wage Reporting?

People who:

1. Don't receive SSI
2. Use work incentive deductions (IRWE, BWE, PASS). BUT, people who use only the SEIE can use telephone or mobile wage reporting.
3. Are subject to deemed income from a spouse (if married and the spouse is not eligible for SSI) or from a parent (if the SSI recipient is under age 18 and the parent is not eligible for SSI)
4. Work for more than one employer in a calendar month
5. Are self-employed
6. Are not working

# Details About Wage Reporting Methods

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## For SSI

### SSI Telephone or Mobile Wage Reporting – SSI Only

#### Who CAN Use Telephone Wage Reporting?

The person must:

1. Be able to speak first and last name(s) clearly
2. Be able to understand and follow instructions given by the automated system
3. Be able to speak, or enter on telephone keypad, date(s) of birth and Social Security number(s)
4. Call from a quiet location
5. Not meet any of the above reasons that make the person ineligible to use telephone wage reporting

# Details About Wage Reporting Methods

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## For SSI

### SSI Telephone or Mobile Wage Reporting – SSI Only

#### Who CAN Use Mobile Wage Reporting?

The person must:

1. Have an Apple or Android device and download the SSI Mobile Wage Reporting app
2. Be able to understand and follow instructions given by the automated system
3. Not meet any of the above reasons that make the person ineligible to use telephone wage reporting

Mobile wage reporting can work if the person is unable to speak clearly or if s/he is deaf.

# Details About Wage Reporting Methods

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## For SSI

### SSI Telephone or Mobile Wage Reporting – SSI Only

#### When Does a Person Need to Report Using Telephone or Mobile Wage Reporting?

S/he MUST report wages in the first 6 days of the calendar month after the month s/he is reporting wages for.

If the deadline is missed, or if the person is not eligible to use telephone or mobile wage reporting, s/he must use other methods to report earnings for that month.

# Details About Wage Reporting Methods

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## For SSI

### SSI Telephone or Mobile Wage Reporting – SSI Only

#### Using SSI Telephone Wage Reporting

Call 1-866-772-0953 and follow instructions

#### Using SSI Mobile Wage Reporting

Must have an Apple or Android device and download “SSI Mobile Wage Reporting” app., then follow instructions in the app.

See “Details About Wage Reporting Methods for SSDI and SSI Factsheet” for more details.

# Details About Wage Reporting Methods

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## For DHHS Benefits

DHHS reports that MI Bridges is the most reliable and efficient way to report wages and wage changes.

1. Report online at <https://newmibridges.michigan.gov> - register to create an account; OR
2. Call 1-888-642-7434

A confirmation number is provided to track reported changes.

# Details About Wage Reporting Methods

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## Exercises:

1. Mustafa receives SSDI and has just started a new job.

What are his options for reporting his new job to SSA?

# Details About Wage Reporting Methods

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## Exercises:

1. Mustafa receives SSDI and has just started a new job.

What are his options for reporting his new job to SSA? **Call 1-800-772-1213 or local SSA office, mail letter to local SSA office, or visit local SSA office**

# Details About Wage Reporting Methods

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## Exercises:

2. Mustafa continues working in his job. He earns \$1,083 per month gross wages. He is in his TWP.

Should Mustafa be reporting his earnings to SSA?

If so, what are his options?

# Details About Wage Reporting Methods

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## Exercises:

2. Mustafa continues working in his job. He earns \$1,083 per month gross wages. He is in his TWP.

Should Mustafa be reporting his earnings to SSA? **Yes**

If so, what are his options? **Use myWageReport through My Social Security account; mail or deliver pay stubs (or fax, if office recommends) to local SSA office. Request work review.**

# Details About Wage Reporting Methods

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## Exercises:

3. Aki receives SSI. He just started a new job.

What are Aki's options for reporting his new job to SSA?

# Details About Wage Reporting Methods

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## Exercises:

3. Aki receives SSI. He just started a new job.

What are Aki's options for reporting his new job to SSA? **Call 1-800-772-1213 or local SSA office, mail letter to local SSA office, visit local SSA office**

# Details About Wage Reporting Methods

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## Exercises:

4. Aki continues working in his job. He earns the same wages every week.

Should Aki report his wages to SSA?

If so, how often?

What are Aki's options for reporting his wages to SSA?

# Details About Wage Reporting Methods

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## Exercises:

4. Aki continues working in his job. He earns the same wages every week.

Should Aki report his wages to SSA? **Yes**

If so, how often? **Monthly**

What are Aki's options for reporting his wages to SSA? **Mail, deliver, or (if SSA recommends) fax pay stubs; use myWageReport through My Social Security account; use SSI telephone wage reporting system; use SSI mobile wage reporting system**

# Details About Wage Reporting Methods

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## Exercises:

5. Lucy receives SSDI and a Medicare Savings Program. She just started a new job.

What are her options to report her job to DHHS?

How soon should she report the job to DHHS?

# Details About Wage Reporting Methods

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## Exercises:

5. Lucy receives SSDI and a Medicare Savings Program. She just started a new job.

What are her options to report her job to DHHS? **Use MI Bridges system on line or by phone, call DHHS Caseworker, use Change Report Form (DHS 2440) or report in person at local DHHS office**

How soon should she report the job to DHHS? **Within 10 days after getting her first paycheck**

# Details About Wage Reporting Methods

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## Exercises:

6. Lucy continues working in her job. Six months later, she gets a raise.

Should Lucy report the raise to DHHS?

If so, what are her options to report the raise to DHHS?

How soon should she report the raise to DHHS?

# Details About Wage Reporting Methods

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## Exercises:

6. Lucy continues working in her job. Six months later, she gets a raise.

Should Lucy report the raise to DHHS? **Yes**

If so, what are her options to report the raise to DHHS? **Use MI Bridges system on line or by phone, call DHHS Caseworker, use Change Report Form (DHS 2440) or report in person at local DHHS office**

How soon should she report the raise to DHHS? **Within 10 days after receiving first paycheck reflecting the raise**

# How Should Work Incentives Be Reported for Title II?

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If a person is using, or may be interested in, specialized work incentives, refer her/him to a Benefit Planner.

Forms and documents should be used in partnership with a benefits planner as applicable to report work incentives:

**Work Activity Report – Employee (SSA 821 form - <https://www.ssa.gov/forms/ssa-821.pdf>)** – enables the person to report IRWEs, subsidies and special conditions when starting a job (items 5, 6 and 7). SSA sends the person this form during a work review.

**Receipts or other proof of payment for all IRWEs**

# How Should Work Incentives Be Reported for Title II?

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These forms and documents should be used to report work incentives:

**Work Activity Questionnaire (SSA 3033 form - <https://www.ssa.gov/forms/ssa-3033.pdf>)** – employers can use this form to document subsidies and possible unsuccessful work attempts (UWAs).

**Statement from supported employment provider documenting subsidies for job coaching (known as “special conditions”)**

**Change in Wages or Work Incentives Status form** - if work incentive use changes (work incentives are added, deleted, or amounts change enough to cause countable earnings to either go above SGA or fall below SGA), this form MAY be used. However, if work incentive use changes enough to change benefit or work incentive status (e.g., go above or below SGA after the TWP has ended), the person should request a work review.

# How Should Work Incentives Be Reported for SSI?

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If a person is using, or may be interested in, specialized work incentives, refer her/him to a Benefit Planner.

These forms and documents should be used to report work incentives:

**Student Earned Income (SEIE) Request Form** – If the person is a student under age 22 regularly attending school or job training, this form lets him/her request the SEIE.

**Change in Wages or Work Incentives Status form** – can be used to report IRWEs, BWEs and changes to work incentive use (work incentives are added, deleted, or amounts change)

**Receipts or other proof of payment for all IRWEs or BWEs**

# How Often Should Work Incentives Be Reported?

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## For Title II

1. When job starts after TWP ends, and gross wages are near or above SGA
2. When job continues and TWP ends, and gross wages are near or above SGA
3. When work incentive use changes (work incentives are added, deleted, or amounts change enough to cause countable earnings to either go above SGA or fall below SGA)
4. During a work review (work continuing disability review (CDR))

# How Often Should Work Incentives Be Reported?

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## For SSI

1. When job starts
2. When work incentive use changes (work incentives are added, deleted, or amounts change)
3. When requested by SSA

# Saving Wage and Work Incentive Reports

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An individual should keep a Benefits Binder – a paper or electronic record of all documents related to reporting wages and work incentives.

The Binder should include copies of:

1. All pay stubs or other types of earnings reports
2. Work incentive forms and documents
3. Receipts or fax confirmation for wage and work incentive reporting to SSA
4. Confirmation #'s for wage reporting to DHHS using MI Bridges
5. Notes from phone calls with benefit agencies
6. Any other documents the person sends to SSA or DHHS
7. Any letters or documents the person receives from SSA or DHHS

# What Should People Do If They Are Overpaid, In Spite of Reporting Their Wages and Work Incentives?

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If the person receives an overpayment notice, or appears to have been overpaid, refer him/her to a Benefit Planner.

With the Benefit Planner's assistance, the person should contact SSA or DHHS to request that benefits be adjusted and an overpayment notice be issued, if it hasn't been already. Call monthly until benefits are adjusted.

# What Should People Do If They Are Overpaid, In Spite of Reporting Their Wages and Work Incentives?

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The person **SHOULD NOT SPEND THE OVERPAID FUNDS**. S/he should save the overpaid funds so that s/he can easily repay the overpayment once the overpayment letter is received.

If the person receives benefits with resource limits, and saving overpaid funds may cause resources to exceed the limit(s), the person may be able to deposit overpaid funds into an ABLE account.

Funds in an ABLE account are not counted against resource limits (for SSI, only the first \$100,000 is not counted as a resource).

The person must have become disabled before age 26 to be eligible to open an ABLE account. However, the person may be 26 or older when the account is opened, as long as the disability began before age 26.

# Benefit to Work Coach's Role Regarding Reporting Wages and Work Incentives

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A Benefit to Work Coach should:

1. Explain reporting requirements and options for reporting to individuals
2. Remind people to report, and follow up to be sure they have, but not report for them
3. Refer people to Benefit Planners if they:
  - Use (or would like to use) specialized work incentives (IRWEs, subsidies, SEIE, BWE, PASS)
  - Receive overpayment letters or appear to have been overpaid
4. Possibly work together with Benefit Planners to document some work incentives (particularly IRWEs and subsidies – See “Identifying and Documenting IRWEs and Subsidies for People Who Get Title II” webinar)