Following Up with Customers at Key Transition Points

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2019

Learning Objectives

- Define "transition point"
- 2. Identify importance of checking with individual during key transition points
- 3. List examples of key transition points for Title II, SSI and medical benefits
- 4. Use DB 101 Benefits and Work Estimator to possibly identify additional transition points and timelines
- 5. Summarize assistance that a Benefit to Work Coach should provide at transition points
- 6. List transition points, time frames and assistance to provide for case studies

Significance of Transition Points

- A Benefit to Work Coach explains the impact of earnings and work incentives on a person's cash benefits from Social Security and public medical benefits, particularly Medicare and Medicaid.
- Ideally, the Coach can meet with the person before s/he starts a job, or very soon after the job begins.
- This helps the person make informed decisions about work and earnings goals.

Significance of Transition Points

- The actual impact of earnings on benefits, and other key transition points, often occur months or years after work begins.
- The Coach should check in with the individual at these transition points –
 when earnings change benefit or work incentive status.
- This helps ensure the person has the information s/he needs to choose to continue working when this would improve her/his financial situation, rather than stopping work or cutting earnings due to fears of benefit loss.

What Is a Transition Point?

- An event or point in time when:
 - The impact of earnings on cash and/or medical benefits starts or changes, or
 - The person's work incentive status changes
- Some transition points can't always be accurately predicted.
- For example, you can't usually be sure when a person will start or stop a job.
- Other transition points can be anticipated very accurately.
- For example, once a person uses his/her 9th and final Trial Work Period (TWP) month, you know that his/her Extended Period of Eligibility (EPE) will begin the very next month, and continue for 36 consecutive months.

First Things First

- Before addressing transition points, it's important to get accurate information about a person's current work incentive status and earnings record.
- Review the person's BPQY.
- If there appear to be discrepancies (earnings SSA has not reviewed, inaccurate or outdated work incentive status, other errors), discuss with the individual to help identify accurate information.
- If necessary, speak with a Benefit Planner.
- Contact SSA to resolve discrepancies, request work reviews, etc.

Examples of Key Transition Points - Title II Benefits

- Starting or stopping a job, or wage amounts change
- End of the TWP
- Having gross wages go above or below SGA level after the TWP
- Identifying/documenting possible IRWEs, subsidies
- Having countable wages (after subtracting IRWEs and subsidies) go above or below SGA level after the TWP
- First month countable wages reach SGA after the TWP and two consecutive months that follow (cessation month and grace period)

Examples of Key Transition Points - Title II Benefits

- End of extended period of eligibility (EPE)
- Benefit termination month (first month countable wages reach SGA after EPE and grace period)
- Countable earnings drop below SGA or stop within 5 years of benefit termination due to SGA (may qualify for Expedited Reinstatement (ExR))
- Five years after benefit termination month due to SGA (usual deadline for requesting ExR)
- Submit/obtain approval for Plan to Achieve Self Support (PASS) and subsequent PASS reviews

Examples of Key Transition Points - Title II Benefits

- Person has overpayment or underpayment
- Work continuing disability reviews (CDRs) and SGA determinations
- Becoming entitled to another Title II benefit (e.g., CDB works long enough to obtain insured status for SSDI)
- SSDI beneficiary reaches age for possible early retirement (age 62) or full retirement age (currently age 66)
- Marriage of a CDB to a person who does not receive Title II benefits
- Medical CDR
- Medical CDR finds person has medically improved

- When wages start, change, or stop
- When unearned income starts, changes or stops
- When earnings reach the "break even" point the point when countable income reduces the SSI payment to \$0
- When earnings fall below the "break even" point
- When earnings reach the usual 1619(b) state threshold (\$36,552 in Michigan in 2019)

- When student status changes become a student under age 22 who regularly attends school or job training, stop regular attendance, or reach age 22 (gain or lose eligibility for Student Earned Income Exclusion (SEIE))
- When person starts paying for expenses related to work and disability/other medical condition (Impairment Related Work Expenses (IRWEs)), or these expense amounts change or stop
- When person begins to meet SSA definition of statutory blindness
- When blind person starts paying for work-related expenses (Blind Work Expenses (BWEs)), or these expense amounts change or stop

- Prepare, submit/obtain approval for, or modify Plan to Achieve Self Support (PASS) and subsequent PASS reviews
- Benefit termination month (e.g., 12 months after earnings exceed 1619(b) threshold)
- Countable earnings drop below SGA or stop within 5 years of benefit termination due to wages (may be eligible for ExR)
- Five years after benefit termination month (usual deadline for requesting ExR)
- Person has overpayment or underpayment

- Redeterminations
- Living arrangements change
- Becoming entitled to a Title II benefit (SSDI, CDB or DWB)
- 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 ABLE accounts)
- Marriage or divorce
- Medical CDR
- Medical CDR finds person has medically improved

Examples of Key Transition Points – Medicare & Medicaid

- End of extended period of Medicare coverage (at least 93 months after TWP ends)
- When countable income or resources go above or below limits for form of Medicaid person receives or might be eligible for
- When countable income or resources go above or below limits for Medicare Savings Program (MSP) person receives or might be eligible for
- When person may benefit from Freedom to Work (FTW)

Using DB 101 Benefits and Work Estimator to Check Transition Points and Possibly Add Others

- The DB 101 Benefits and Work Estimaator (at mi.db101.org) includes a feature that identifies some key transition points for a person and a timeline for all of them.
- You can use this feature to identify transition points, check the transition points you may have already identified, and possibly discover some transition points you may have missed.
- Complete a Benefits and Work Estimator session with (or for) the person.
- When you arrive at the Results Summary page, click on "Timeline" near the top of the page.
- Review the timeline to identify and/or check transition points and time frames for them.

Using DB 101 Benefits and Work Estimator to Check Transition Points and Possibly Add Others

Benefits and Work Estimator: Shaquan

Results: Timeline

Plan A							
Results	Plan Recap	Timeline	Monthly Income/Expense	Health	Tips	Next Steps	
Click on a date to see a monthly income/expense summary.							
<u>Sep 2019</u>	Job "Plan A	Job" starts at	11.00/hr, 30 hrs/week				
	§ \$1,435.50 in earnings begins.			l	Report all changes in earnings promptly to the appropriate agencies.		
	 SSDI Trial Work month 5 of 9 used. Total income this month: \$2,595.50. 						
Oct 2019	SSDI Trial Work month 6 of 9 used.						
Nov 2019	SSDI Trial Work month 7 of 9 used.						
Dec 2019	SSDI Trial Work month 8 of 9 used.						
Jan 2020	S Last SSDI Trial Work month (9 of 9) used. Extended Period of Eligibility starts next month.						
Feb 2020	SSDI Extend	ded Period of	Eligibility begins.				
Jan 2023	SSDI Extend	ded Period of	Eligibility ends.	ı	□ Check	with a Benefits Planner or your	
						ocial Security office d if you	
					have qu	uestions about SSDI.	

What Should A Benefit to Work Coach Do at Transition Points?

- Schedule followup with each individual before (or when) s/he reaches a transition point.
- If you know or can predict when a transition point will happen, schedule contact before the transition point occurs.
- During contact with the person, you should:
 - Check the person's status
 - (Re)-Explain the transition point to the individual, if necessary
 - Explain any action the person needs to take
 - Offer assistance as needed, and
 - Refer to a Benefit Planner, when appropriate.

What Should A Benefit to Work Coach Do at Transition Points?

- Encourage every individual to contact you or the assigned Benefit Planner each time s/he receives a letter from Social Security or another agency that administers his/her benefits.
- You or the Benefit Planner can assist the person to understand the purpose of the letter, action s/he needs to take, and help you or the Benefit Planner can provide.
- The more regular contact you have with an individual, the more likely it is that s/he
 will report important changes to you (such as wage changes), ask you questions,
 and check with you when s/he receives a letter from Social Security or another
 agency.

Case Study - Letitia

- Letitia is 43 years old.
- She receives a \$960/month Childhood Disability Benefit (CDB) based on her deceased mother's work record, Medicaid through Aged and Disabled Care (AD-Care), Medicare and Qualified Medicare Beneficiary (QMB).
- She has \$950 in her checking account.
- She receives services from a CMH and urgently wants to keep Medicaid to continue these services.
- She is not blind. She is unmarried and has no children.
- Letitia's BPQY indicates she has used 5 Trial Work Period (TWP) months, and she had a work review after the last month she reports having worked. She has no overpayments on her record. Her BPQY does not appear to have any discrepancies.

Case Study - Letitia

- Letitia accepted a job offer in August 2019 working an average of 25 hours/week @ \$12.50/hour (25 hours/week x \$12.50/hour x 4.33 weeks/month = \$1,353/month gross wages).
- She pays for copays for psychotherapy and psychiatric medications (\$60/month average).
- She has a job coach who will likely assist her on the job about 6 hours/week (26 hours/month).
 - 1. What are some key transition points for her benefits?
 - 2. When should you check with her about each?
 - 3. What assistance should you offer?

Job starts

- **8/2019**
- Advise Letitia to report her wages to SSA

Countable income above limit for AD-Care ((\$1,353-65-60 IRWE = \$1,228/2 = \$614) + (\$960-20 = \$940) = \$1,554/month > \$1,041/month countable income limit for AD-Care)

- 8/2019
- Advise Letitia to report her wages to DHHS and be prepared for AD-Care to stop

Countable income above limit for QMB and other Medicare Savings Programs (MSP) (\$1,554/month > \$1,249/month = countable income limit for SLMB - **NOTE:** A person who receives Medicaid is ineligible for ALMB.)

- 8/2019
- Advise Letitia to report her wages to DHHS and be prepared for MSP to stop, so she will need to pay out-of-pocket Medicare expenses

Consider applying for Freedom to Work (FTW) Medicaid (monthly premium would be 2.5% of total income = $$960 + $1,353 = $2,313 \times 2.5\% = $58/month$)

8/2019

Refer Letitia to Benefit Planner to help her apply for FTW

End of TWP

- 11/2019 is likely 9th TWP month check in 10/2019
- Advise Letitia to report wages to SSA

<u>Develop and document possible IRWEs and subsidies</u> (IRWEs = \$60/month. Subsidy = 26 hours/month x \$12.50/hour = \$325. \$1,353/month gross wages - \$60 IRWE - \$325 subsidy = <math>\$968/month countable income < \$1,220/month (SGA))

- 9/2019 (2 months before TWP ends)
- Refer to Benefit Planner to develop and document possible IRWEs and subsidy

End of Extended Period of Eligibility (EPE)

- 10/2022 (month before EPE ends)
- Check earnings status; discuss impact on benefits if earnings increase (CDB will continue if countable earnings stay below SGA. Possible CDB termination, after grace period, if countable earnings reach SGA. If wages later drop below SGA within 5 years of termination, could request ExR.)

Any changes to wages

- When they occur
- Remind Letitia to report changes to Benefit to Work Coach; report wage changes as needed

Case Study - Gamon

- Gamon is 22 years old.
- He receives \$771/month SSI, \$42/quarter (\$14/month) SSP and Medicaid.
- He shares an apartment with a friend and pays half of all expenses.
- He is not blind. He is unmarried and has no children.
- His BPQY lists gross wages of \$6,500 in 2018 and \$1,600 in the first three months of 2019, all of which Gamon reported. His SSI had been adjusted. He has no overpayments on his record. His BPQY does not appear to have any discrepancies.
- His checking and savings accounts have combined balances of \$1,900.

Case Study - Gamon

- Gamon needs Medicaid to cover services he receives from his local CMH.
- He was offered a full-time job in August 2019. He will work 40 hours/week and earn \$16/hour (40 hours/week x \$16/hour x 4.33 weeks/month = \$2,771/month gross wages).
- He will take public transportation to work and will pay for no other work-related expenses.
 - 1. What are some key transition points for his benefits?
 - 2. When should you check with him about each?
 - 3. What assistance should you offer?

Gamon's Transition Points, Dates, Help to Offer Him

Job starts

- 8/2019
- Advise Gamon to report his wages to SSA

Wages above break-even point, but below 1619(b) threshold (\$36,552/year = \$3,046/month)

- 8/2019
- Refer Gamon to Benefit Planner to verify with SSA that he will go into 1619(b) status; advise him to report wages to DHHS; ensure SSP stops

Gamon's Transition Points, Dates, Help to Offer Him

Countable resources close to \$2,000

- 8/2019
- Advise Gamon about options to exclude resources for SSI purposes, especially using an ABLE account

Gamon's Transition Points, Dates, Help to Offer Him

Potential SSDI entitlement

- 8/2019 (A person under age 24 needs only 6 work credits for insured status for SSDI. In 2018, a person needed to earn \$1,320 in wages subject to Social Security taxes to earn 1 work credit, and \$5,280 to earn 4 work credits. In 2019, a person needs to earn \$1,360 for 1 work credit and \$2,720 for 2 credits. Gamon needs to earn \$1,120 more in 2019 to have earned 6 credits total. He will earn more than that in August 2019. However, Gamon won't become entitled to SSDI unless and until his earnings drop below SGA.)
- Advise Gamon about possible SSDI eligibility if his wages drop below SGA.

Case Study - Juanita

- Juanita is 37 years old.
- She receives \$550/month SSDI, \$164/month SSI and \$42/quarter (\$14/month) SSP.
 She also receives Medicare, Medicaid and QMB.
- She has been renting a room in her aunt's house and paying the full cost of her room and board.
- Juanita has no children. She is not blind.
- She is engaged to be married in June 2020. Her fiancée is not disabled and works part-time.

Case Study - Juanita

- Juanita's BPQY shows IRS recorded earnings of \$10,800 in 2017 and \$11,250 in 2018, but no reported earnings for SSDI or SSI, and her last work review was in 2016.
- Juanita reports that she worked every month in 2017 and 2018, but stopped work in December 2018. The BPQY indicates she has not used any TWP months.
- Juanita has a SSI overpayment on her record of \$1,765 from 2016 and \$77.10/month
 is being withheld from her SSI to recover the overpayment.
- Juanita has a checking account with a balance of \$40. Her fiancée has a checking account, but Juanita does not know the balance.

Case Study - Juanita

- Juanita needs Medicaid to cover services from her CMH.
- She is planning to start a new job in December 2019 working 32 hours/week @ \$10.25/hour (32 hours/week x \$10.25/hour x 4.33 weeks/month = \$1,420/month).
- She has no disability-related expenses, but will receive an average of 4 hours/week (17 hours/month) of job coaching.
- In previous jobs, Juanita has received extra help from coworkers and supervisors, and she has typically worked more slowly than coworkers.
 - 1. What are some key transition points for her benefits?
 - 2. When should you check with her about each?
 - 3. What assistance should you offer?

Resolve BPQY discrepancies

- 12/2019
- Request work review from SSA to develop wages from 2017 and 2018, and report wages for SSI. Average wages in 2017 were \$900/month; TWP threshold was \$840/month and non-blind SGA level was \$1,170/month in 2017. Average wages in 2018 were \$937.50/month; TWP threshold was \$850/month and non-blind SGA level was \$1,180/month in 2018. It appears likely she used up all 9 of her TWP months, but did not perform SGA. It also seems likely she has an additional SSI overpayment for earnings in 2017 and 2018. Alert Juanita that she probably has an additional SSI overpayment.

Job starts

- 12/2019
- Advise Juanita to report her wages to SSA

Countable income above limit for QMB, but below limit for SLMB ((\$1,420 - 65 = \$1,355/2 = \$677.50) + (\$550 - 20 = \$530) = \$1,207.50 < \$1,249/month = countable income limit for SLMB)

- 12/2019
- Advise Juanita to report her wages to DHHS, be prepared for QMB to stop, and help her apply for SLMB

<u>Develop and document possible subsidies</u> (Subsidy for job coaching = 17 hours/month x \$10.25/hour = \$174/month. \$1,420/month gross wages - \$174 = \$1,246/month. She would need only \$27/month more in other subsidies to show her countable wages are below SGA.)

- 12/2019
- Refer to Benefit Planner to develop and document possible subsidies

End of Extended Period of Eligibility (EPE)

- Not certain, but likely in late 2020. Need to await work review by SSA to determine when TWP ended.
- Check earnings status; discuss impact on benefits if countable earnings reach SGA (SSDI will continue if countable earnings stay below SGA.
 Possible SSDI termination, after grace period and EPE, if countable earnings reach SGA. If wages later drop below SGA within 5 years of termination, could request ExR.)

Wages above break-even point, but below 1619(b) threshold (\$36,552/year = \$3,046/month)

- 12/2019
- Refer Juanita to Benefit Planner to verify with SSA that she will go into 1619(b) status; advise her to report wages to DHHS; ensure SSP stops

Any changes to wages

- When they occur
- Remind Juanita to report changes to Benefit to Work Coach; report wage changes
 as needed

<u>Marriage</u>

- 6/2020 discuss possible impact of marriage on benefits in early 2020
- Discuss impact of husband's income and resources, which will likely end 1619(b) eligibility. Husband's money might also stop eligibility for SLMB, so she would need to pay for Medicare costs. Consider Freedom to Work Medicaid, which could replace Medicaid lost due to husband's money, though she would have to pay a monthly premium.