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Purpose and Background Information

Introduction

What is an IDA?

Lack of information about IDAs, misinformation about IDA impacts on means-tested benefits, and challenges that AFI grantees face in identifying and serving people with disabilities contribute to low participation rates. This toolkit addresses those issues and provides information on increasing IDA use by people with disabilities.

Purpose of the Toolkit

Since 1998, AFI grantees have provided vital services to low-income and disadvantaged individuals and families seeking to build assets and improve financial stability.

Since 2006, the AFI Resource Center has worked on an initiative to help AFI grantees better serve people with disabilities. This initiative has resulted in a number of activities, most notably:

- ▶ Developing the [AFI Resource Center webpage on Serving People with Disabilities](http://www.idaresources.org/disability) (www.idaresources.org/disability). This webpage has a number of resources to help AFI grantees work with Disability Service Providers to better serve people with disabilities.
- ▶ Conducting webinars for AFI grantees and other audiences interested in serving people with disabilities. These webinars are posted on our website.
- ▶ Assisting eight AFI grantee pilot sites in forming partnerships with Disability Service Providers to better serve the population.

The AFI Resource Center developed this toolkit to further our efforts in this area. We have compiled some of the most important information from our website materials into a toolkit to help grantees become more inclusive of people with disabilities. The toolkit also provides helpful information on how to develop partnerships with Disability Service Providers for better outreach to people with disabilities and training for working with potential IDA participants with disabilities.

As the toolkit outlines, people with disabilities are a disproportionately low-income population. Because of this, people with disabilities account for a large share of the AFI target population, but they are underrepresented among IDA participants. Lack of information about IDAs, misinformation about IDA impacts on means-tested benefits, and challenges that AFI grantees face in identifying and serving people with disabilities contribute to low participation rates. This toolkit addresses those issues and provides information on increasing IDA use by people with disabilities.

Understanding Asset Development for Individuals with Disabilities

Introduction

For over a decade, the federal government has sought to supplement income support programs with asset building efforts that focus on helping individuals and families make long-term investments in education, housing and economic development that foster sustainable reduction in poverty levels. This approach is about encouraging people to save money and to make investments that increase in value over time. The assumption is that as individuals develop assets, they and their families will be able to permanently increase their incomes and move out of poverty.

Assets for Independence (AFI) Individual Development Accounts (IDAs) are an important tool in asset building for low-income individuals. AFI projects assist client families to save earned income in IDAs – special matched savings accounts. Clients can use their AFI IDA savings and matched funds to acquire one of the following assets: a first home, capitalization of a small business, or post-secondary education or training.

Asset building, until recently, has received little attention in the disability community due in large part to the misperception that work and asset accumulation jeopardize eligibility for and continued access to Social Security Disability benefits. For many individuals with disabilities, these benefits are a primary source of income essential to meeting basic living needs. They also provide access to health insurance through Medicaid and Medicare.

This misunderstanding of state and federal policy is especially critical for individuals with disabilities, many of whom live at or below the poverty level. People with disabilities are more likely to be unemployed and to live in poverty than any other single demographic group in the United States today.



Joe, Community Vision, Inc.

- ▶ As many as 70 percent of people with disabilities are unemployed.
- ▶ One-third of adults with disabilities live in households with total income of \$15,000 or less, as compared to only 12 percent of those without disabilities.¹
- ▶ More than 65 percent of individuals in poverty for 36 months or more during a 48-month period have a disability.²
- ▶ The poverty rate among people with disabilities is increasing relative to that of working-age people without work limitations.³

Americans with disabilities severe enough to qualify for the Social Security disability programs are often living especially impoverished lives in terms of income, savings, or resources. In March 2011, the Social Security Administration (SSA) reported that more than 4.4 million adults aged 18-64 received Supplemental Security Income (SSI) payments based upon disability. SSI is a means-tested program – that is, it is restricted to families or individuals who meet specified financial requirements and certain other eligibility criteria. In the case of an adult, this means an inability to work because of a medical condition.

- ▶ SSI payments provide only limited income support: The maximum federal benefit rate (FBR) in 2012 is \$698 per month, or 75 percent of the 2012 federal poverty standard for a household of one.⁴
- ▶ To qualify for SSI, an individual must have limited earned income, countable unearned income of less than the 2012 FBR of \$698, and very limited countable resources in order to retain eligibility.

An additional 7.5 million adults received disability benefits from SSA under Social Security's disability insurance program (SSDI) in 2011 – the most recent year for which data is available. While this is not a means-tested program with the income and asset restrictions inherent in the SSI program, the income support it provides is also quite small.⁵ The average monthly SSA disability payment in 2011 was \$1070, representing only 118 percent of the federal poverty level for a family of one.⁶

Asset Development Strategies for Individuals with Disabilities

One of the key problems related to asset development for beneficiaries of SSA disability benefits is the confusion about how disability programs treat income and resources for purposes of program eligibility. For example, building wealth has never been a problem for SSDI beneficiaries because these benefits are not based on economic need and there has never been any restriction on savings, investment, or asset accumulation. However, because there is a common misconception in the disability community that this program is means-tested, an SSDI beneficiary may consider disposing of their resources out of fear that retaining them will cause loss or reduction of benefits.

SSI beneficiaries, however, do have barriers to asset accumulation. The SSI program has stringent resource limits that have not increased since the program's inception in 1974. In order to retain SSI eligibility, beneficiaries must not have countable resources in excess of \$2,000 for an individual or \$3,000 for an SSI eligible couple (as of 2012). There are, however, numerous resources that are excluded from this limit that can be used to accumulate assets and build wealth. Many important SSA provisions allow accumulation of the same assets as the AFI IDA program:

- ▶ ***Home Ownership:*** SSA regulations permit an SSI beneficiary to own one home of any value as long as the individual lives in it. Parents may even give or transfer ownership of a home to a child on SSI and it will only count as income in the month it is received. In addition, neither home equity loans nor mortgages count as income for SSI eligibility purpose.
- ▶ ***Business Ownership:*** Business ownership is sometimes incorrectly viewed as an unrealistic employment goal for people with disabilities. In fact, SSI allows unlimited accumulation of assets (including cash in a business account) for the operation of certain small businesses or micro-enterprises under the exclusion of "property essential for self-support." The same is true for Medicaid eligibility because states cannot adopt Medicaid income and resource rules that are more stringent than those for SSI.
- ▶ ***Post-Secondary Education:*** SSA offers several resource exclusions to allow SSI beneficiaries to save or pay for post-secondary education. The Social Security Protection Act of 2004⁷ provides a nine-month resource exclusion for grants, scholarships,

fellowships, and gifts used to pay for tuition, fees, and other necessary educational expenses at any educational institution. SSI beneficiaries also have access to the standard federal educational assistance programs available to any qualified individual who needs help paying for higher education and SSA provides numerous exclusions for the various forms of educational assistance. Student financial assistance received under Title IV of the Higher Education Act (HEA), such as PELL grants and federal work-study programs, are not counted as either income or resources for SSI eligibility purposes.

- ▶ ***Plans for Achieving Self-Support (PASS)***: The PASS provisions under the Social Security Act are an opportunity for individuals with disabilities to accumulate income and/or resources without causing either ineligibility for SSI or a reduction in benefit payments. Under an approved PASS, an individual may set aside earned income, unearned income and/or resources in a special account to pay for items or services needed to achieve a specified occupational goal. These income and/or resources are completely disregarded when determining an individual's eligibility for SSI or in calculating the SSI payment amount. Furthermore, federal regulations require that PASS funds be excluded by Medicaid, TANF, Supplemental Nutrition Assistance Program (SNAP), and HUD rental assistance programs.

Individual Development Accounts for People with Disabilities

IDAs are most widely available through the AFI program and state welfare (Temporary Assistance for Needy Families [TANF]) programs. SSA regulations specifically exclude these two types of accounts from countable resources for SSI beneficiaries. Any earnings an individual contributes to an AFI or TANF IDA are deducted from wages when determining countable income for SSI purposes. Matching funds that are deposited in an AFI or TANF IDA are also excluded from income, as well as any interest earned on the individual's own contributions. Other federal programs, including Medicaid, SNAP and HUD housing subsidies are required to disregard TANF and AFI IDA funds from the means-testing process.



John, Community Vision, Inc.

Although IDAs can offer a valuable path to greater economic security for people with disabilities, anecdotal evidence suggests that people with disabilities are significantly under-represented within the IDA participant population nationwide.⁸ A key factor in low IDA participation is the requirement that only earned income can be contributed; the majority of people with disabilities are unemployed. However, participation rates are low even among employed beneficiaries. Reasons include:

- ▶ ***Lack of awareness of IDAs within the disability population and disability services provider community.*** Many people with disabilities, as well as their families and the disability services providers, are not aware that IDAs exist. Improved information sharing and outreach activities could do much to enhance participation in IDA programs by individuals with disabilities. Specifically, effort should be focused on the vocational rehabilitation and workforce preparation systems because so many participants in these programs are planning to enter the workforce and would be expected to have earned income to contribute to an IDA.
- ▶ ***Lack of knowledge about how IDA funds are treated by federal means-tested programs.*** While the designation of AFI IDA funds as an excludable resource for SSI benefit determination purposes has been in place since January 2001, very few beneficiaries

IDA Awareness

First and foremost, attention needs to be paid to increasing awareness within the disability community about what IDAs are and how AFI IDAs can benefit people with disabilities.

and disability service professionals are familiar with this exclusion. In addition, many people with disabilities do not know that IDAs are excluded from consideration in the eligibility determinations of all other means-tested federal programs, such as Medicaid, SNAP and HUD housing subsidies. In many cases, the professionals working in these programs are themselves may be unaware of this exclusion and provide misinformation about how IDA funds will affect eligibility.

- ▶ *Lack of physical and programmatic accommodations needed by people with disabilities.* Lack of accommodations and information about how to provide accommodations are major barriers to participation in IDA programs by people with disabilities.⁹ This includes the inability to physically access program sites, problems dealing with the initial application process and participation in required financial literacy classes, and ongoing communication barriers imposed by disability.

Meeting the Needs of Individuals with Disabilities in AFI IDA Programs

There are four areas in which AFI grantees can improve access to IDAs for people with disabilities.

- ▶ *Perform effective outreach to individuals with disabilities and disability service providers.* First and foremost, attention needs to be paid to increasing awareness within the disability community about what IDAs are and how AFI IDAs can benefit people with disabilities. It is unlikely that AFI grantees will come into contact with large numbers of individuals with significant disabilities if outreach efforts are not expanded to specifically target them. Many people with disabilities interact with agencies specifically designed to serve the disability community. To improve outreach activities, AFI grantees could target their public education efforts on the array of local disability service providers. A good way to start is with agencies that provide vocational or employment services and supports, such as the designated [State vocational rehabilitation agency](http://www.ed.gov/about/offices/list/osers/rsa/index.html) (<http://www.ed.gov/about/offices/list/osers/rsa/index.html>), [Ticket to Work Employment Networks](http://www.yourtickettowork.com/endir) (<http://www.yourtickettowork.com/endir>), or other local community rehabilitation providers. In some states, a separate agency is designated to serve individuals who are blind. Native American Tribes also have a designated vocational rehabilitation service agency. These entities serve numerous individuals who would be candidates for the AFI IDA program and can provide information on other agencies in the local area that should also be contacted.
- ▶ *Ensure access to AFI IDA services.* The word "accessibility" has many meanings when it is applied to individuals with disabilities. It may encompass having a building that is physically accessible for individuals who use wheelchairs or who have other mobility challenges. Accessibility also refers to having application processes that do not pose barriers to people who may be blind, or otherwise are unable to read or complete forms. Providing full access may also mean that an interpreter is provided when interviewing an applicant who is deaf or hard of hearing. The key to full accessibility is to follow the rules of "universal design," which simply means that the physical layout is usable by anyone. A valuable tool to improve program accessibility is to conduct an accessibility review that identifies the aspects of buildings, processes, and services that might pose barriers. [Centers for Independent Living or the State Independent Living Council](http://www.ilru.org/html/publications/directory/index.html) (<http://www.ilru.org/html/publications/directory/index.html>) have additional

information about universal design and how to make changes to better accommodate customers with disabilities. Another resource is the [State vocational rehabilitation agency](http://www.ed.gov/about/offices/list/osers/rsa/index.html) (<http://www.ed.gov/about/offices/list/osers/rsa/index.html>).

- ▶ *Support IDA participants with disabilities to successfully complete IDA programs.* IDA participants who experience disability may need more support from AFI grantees, or perhaps different kinds of support than other participants, in order to successfully complete the IDA program. For example, individuals with an intellectual disability or other significant developmental disabilities may have appointed representative payees who help them manage their SSA benefits and other finances. Additionally, individuals with disabilities such as serious mental illness or Multiple Sclerosis may have periods of time when the symptoms of the disability increase, which may cause absences from work, difficulty with keeping appointments, and other problems that require accommodation. The best strategy for dealing with individual differences caused by disabilities is to ask participants to identify the accommodations they feel will be necessary or are preferred. In many cases, participants with disabilities will be involved with agencies that provide disability services and supports. AFI grantees could work in partnership with these agencies.
- ▶ *Accommodate the needs of persons with disabilities in required financial literacy programs.* Individuals with disabilities may also require accommodations to successfully participate in the required financial education components of AFI IDA projects. For example, many current financial education classes may not be taught at a level or using methods that individuals with learning disabilities or intellectual impairments can understand. Or, the methods used for teaching the course, or the materials that accompany the lessons, may not be in accessible formats. In addition, physical accessibility of the facility where the class is being conducted can also be a barrier. Finally, most generic financial education curricula do not include a key component for people with disabilities – benefits literacy – a basic understanding of the public income maintenance programs such as SSI, Medicaid or Medicare, SNAP, rental assistance, or any other income support the person receives. Often, beneficiaries and their families are unaware of the rules governing eligibility and benefit amounts for these programs and may make decisions that inadvertently cause financial harm. Since many persons with disabilities will remain on some form of public benefit even after they become employed, it is important that some training on managing these benefits be included in financial education courses for IDA participants. If it is not possible to include benefits literacy as part of the regular financial education course, AFI grantees could fill this need by getting help from the local agency funded by SSA to provide Work Incentives Planning and Assistance (WIPA) services (<http://www.ssa.gov/work/ServiceProviders/wipafactsheet.html>).



Thomas, CASA of Oregon

Conclusion

AFI IDAs represent a powerful, yet under-utilized opportunity for persons with disabilities to build wealth, independence and productivity. This underutilization is due to a number of complex causes, not the least of which involves a fear that IDAs will cause loss of critical SSA disability cash payments and essential health insurance such as Medicaid or Medicare. In fact, SSA provisions allow asset building in the three IDA-eligible areas (home ownership, business ownership, and educational savings). Agencies serving individuals with disabilities

can help to dispel these misconceptions and fears and assist people with disabilities in improving their financial outlook and stability.

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- ⁷ Public Law 108-203
- ⁸ There has been some limited statistical evidence that participation in IDAs by people with disabilities is fairly low. For example, in one survey only 6 percent of respondents with disabilities reported having an IDA compared to 13 percent of people without disabilities. See 2004 National Organization on Disability/Harris Survey of Americans with Disabilities, cited in Testimony of Professor Peter Blanck Before the U.S. House of Representatives, Committee on Governmental Reform, Subcommittee on Human Rights and Wellness, Thursday, June 24, 2004.
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Assets for Independence (AFI): Overcoming Common Misconceptions

Introduction

The AFI Resource Center toolkit for individuals with disabilities aims to increase the availability of AFI IDAs and other effective asset building services to people with disabilities and their families. This initiative provides high quality training, technical assistance, and information on this important topic to AFI grantees. The first step in supporting AFI grantees to expand asset development opportunities for participants with disabilities is to identify commonly held misconceptions about this population and to provide accurate information about how individuals with disabilities can benefit from inclusion in asset-building programs. There are six common misconceptions about serving persons with disabilities in IDA programs.

Overcoming Misconceptions

The first step in supporting AFI grantees to expand asset development opportunities for participants with disabilities is to identify commonly held misconceptions about this population and to provide accurate information about how individuals with disabilities can benefit from inclusion in asset-building programs.

Misconception 1: *I thought that AFI IDAs were designed to assist low-income individuals and families, not people with disabilities.*

- ▶ Individuals with disabilities and individuals with low incomes are not mutually exclusive populations. Because eligibility for many (but not all) disability benefit programs is means tested—that is, restricted to families or individuals who meet specified financial requirements and certain other eligibility criteria—individuals served through these programs often have very limited incomes and few (if any) assets. Research indicates that people with disabilities are considerably more likely to experience poverty relative to those without disabilities; annual poverty rates are two to five times higher among working-age people with disabilities compared to their counterparts without disabilities (She & Livermore, 2006).
- ▶ Not only are people with disabilities often low-income, many low-income participants of government programs have disabilities. Take the example of the Temporary Assistance for Needy Families (TANF) program. One study estimates that 44 percent of TANF recipients ages 18 to 64 has a disability—three times the prevalence of disability among adults who are not TANF recipients. There is also overlap among the populations served by SSI and TANF. SSA reports that approximately 17 percent of TANF households include someone receiving SSI benefits, and roughly one-third of non-elderly women and children who begin receiving SSI benefits were in families receiving TANF at the time of application (Nadel et. al, 2004).

Thus, disability and poverty frequently go hand-in-hand. It is not a question of serving *either* persons of low income *or* individuals with disabilities – by their very nature AFI programs are likely serving significant numbers of individuals with disabilities. In addition, since research indicates that individuals with disabilities experience disproportionate long-term poverty as compared to individuals who do not, individuals with disabilities are good candidates for asset building.

Misconception 2: Our AFI IDA program does not currently have any participants with disabilities and we do not get many inquiries about our services from people who have disabilities.

- ▶ Because disability and poverty are closely linked, it is likely that many AFI grantees are currently working with individuals with disabilities and are simply unaware of this fact in most cases. However, a number of factors make it difficult for AFI projects to identify individuals with disabilities already on their caseloads.
- ▶ Not all persons with disabilities possess conditions that are obvious, observable, noticeable, or readily identifiable. The experience of the TANF program, which also serves low-income families, is telling. Research finds that the prevalence of “hidden disabilities,” including limiting physical conditions, substance abuse and mental health problems, and learning disabilities is quite common (Holcomb & Thompson, 2000). The Government Accountability Office notes that proportion of TANF recipients with disabilities is likely underreported because welfare programs do not have consistent methods for gathering or tracking this information (2001a). Unless AFI grantees actively screen or assess participants, they will likely miss the presence of a disabling condition.
- ▶ Not all people with hidden disabilities are willing to identify themselves as having a disability when seeking services. They may be reluctant to disclose their disability out of fear of discrimination or possible rejection. Additionally, not all individuals with a disabling condition are aware of it. Undiagnosed and untreated disabilities are common among low-income and TANF populations (Loprest & Acs, 1996).

Anecdotal evidence suggests that persons with identifiable disabilities are under-represented within the IDA participant population nationwide. One significant issue is the limited awareness within the disability community of IDAs and how they can be used to help their clients. There is a pervasive notion within the disability community that asset building is either not important (as compared with other urgent priorities) or simply not possible due to barriers imposed by means-tested benefit programs. Information on the benefits of participating in IDA programs has not reached individuals who experience disability, their families, or the agencies providing services and supports.

Misconception 3: My understanding is that people on Social Security disability benefits have disabilities so severe that they are not capable of working. Since only earnings can be set aside in an AFI IDA, individuals on SSA disability benefits would not be good candidates for participation.

- ▶ It is true that the SSA definition of disability is quite stringent and that it is related to an individual’s ability to sustain earnings at a specific level. Unlike Veteran’s Administration benefits, Social Security pays only for total disability; no benefits are payable for partial disability or for short-term disability. The Social Security disability benefits were designed to function as income replacement programs for persons who were unable to

support themselves by working. In order to qualify as having a disability under the SSA criteria, an applicant must be blind or have a physical or mental impairment that prevents engaging in any *substantial gainful activity* and that has lasted or is expected to last 12 months or to result in death. Substantial gainful activity is generally defined in terms of specific earnings thresholds and is currently (in 2012) set at gross countable earnings of \$1,010 or more per month. The decision that an applicant is incapable of significant employment is central to the eligibility determination process.

- ▶ The SSA disability definition has remained virtually unchanged since disability benefits were initiated in the mid-1950s (under Title II of the Social Security Act). These programs were enacted when the prevailing “medical model” of disability focused on providing custodial care for people who could not be integrated into communities as well as individuals who could not be rehabilitated and returned to the workforce. With the advent of supported employment technology in the mid-1970s, employment outcomes for individuals with even the most significant disabilities have increased dramatically (Wehman, Inge, Revell, & Brooke, 2006). In the modern field of vocational rehabilitation, the notion that large groups of people are unemployable due to the type or severity of their disabling conditions has been discarded. The paradox arises because individuals are forced to prove to SSA that they are unable to work at a substantial level in order to qualify for income supports and medical insurance when in fact there is now rehabilitation technology and expertise to make employment a reality for almost anyone who wishes to work.
- ▶ In recent years, SSA made changes that encourage disability beneficiaries to work. The “Ticket-to-Work” program offers disability beneficiaries greater choice in getting the services they need to go to work or to earn more money. The goal of this voluntary program is to help beneficiaries earn enough money so that they will no longer need Social Security cash benefits.
- ▶ The ticket legislation created a benefits planning, assistance, and outreach service to address the fact that many beneficiaries who might otherwise be able to work were choosing not to out of fear of losing cash and medical benefits. While the work incentives built into the disability programs make it quite possible to work and gradually reduce dependence on benefits, few seemed aware of these provisions or understood how they worked. The name of this service was changed in 2006 to Work Incentives Planning and Assistance (WIPA), in order to better reflect its primary focus and intent.



Jolene, Work Incentives Planning and Assistance

Social Security disability benefits also include numerous special provisions known as “work incentives” that allow beneficiaries to test their ability to work without fear of complete benefit loss. These help ease the transition from dependence on benefits to greater self-sufficiency through paid employment or small business ownership. In addition, there are several provisions that permit beneficiaries to retain their Medicaid or Medicare coverage after cash payments end due to earned income. Also, there are several options for quickly getting disability benefits reinstated if an individual’s employment ends or earnings decrease unexpectedly.

Misconception 4: *People with disabilities cannot benefit from AFI IDAs since they are on SSA disability benefits which do not allow beneficiaries to own homes, be self-employed, or save money for higher education goals.*

- ▶ It is widely believed that all people with disabilities are entitled to receive some form of federal benefit. In fact, only a small percentage of all individuals with disabilities receive SSA benefits. The SSA disability standard is quite stringent and many people who apply for benefits are not found eligible. Even individuals with disabilities severe enough to meet SSA's disability standard sometimes find they are ineligible for Social Security Disability Insurance (SSDI) benefits because they do not have insured status as a former worker and have no other work record available to them. In these cases, the only other option available is the SSI program. A significant number of individuals with severe disabilities fail to qualify for SSI benefits because of the strict income and resource limits. Thus, many people with disabilities, even very significant ones, are ineligible for SSA disability cash payments and the associated medical insurance programs (Medicaid and Medicare). In many cases, these individuals turn to the welfare system for assistance.
- ▶ Even for those who do qualify for SSA disability benefits, not all of SSA benefit programs restrict an individual's ability to accumulate assets. Approximately 60 percent of all adults who receive SSA payments based upon disability are beneficiaries of SSDI (Title II). These benefits are not based on economic need and there has never been any restriction on savings, investment, or asset accumulation. Title II beneficiaries are not penalized in any way for having cash savings, pension funds, retirement accounts, real property, or other investments. They may participate in an IDA program without suffering any negative consequences related to eligibility for SSA cash payments or Medicare coverage. Asset accumulation, however, is limited in the SSI and Medicaid programs. As of 2012, in order to retain SSI eligibility, beneficiaries cannot have countable resources in excess of \$2,000 for an individual or \$3,000 for an SSI-eligible couple (two SSI beneficiaries who live together and are married or presenting themselves as married to the community). However, funds set aside and in a federally funded AFI or TANF IDA program are NOT counted as either a resource or as income. This also applies to any match an AFI IDA participant receives, as well as any interest which accrues in the IDA. The savings goals that AFI IDAs support are also excluded from the SSI resource and income tests.

SSI beneficiaries are permitted to own one home of any value, as long as it is the beneficiary's primary residence.

SSI permits ownership of a business through a specific resource exclusion known as "property essential for self-support" (PESS), which allows SSI recipients to accumulate unlimited assets through small business ownership under certain prescribed circumstances. SSI offers a variety of income and resource exclusions specifically designed to encourage saving for post-secondary education. These exclusions include educational loans, scholarships or grants, and income or resources set aside in an approved Plan for

Achieving Self-Support (PASS). Thus, receipt of SSA disability benefits in NO WAY impedes a person's ability to participate in or benefit from the AFI IDA program.

Misconception 5: *Don't people with disabilities have access to asset development programs and services specifically designed for them? If so, why would they need to participate in AFI IDAs?*

- ▶ It is certainly true that there is an entire array of services specifically designed for use by persons with disabilities of all ages. These range from recreational programs to vocational training and employment supports. For the most part, however, there are few asset development programs specifically designed to serve individuals with disabilities. Most of the programs that do exist are focused on the establishment of Special Needs Trusts and Medicaid Trusts, or provide specialized estate planning services for families of individuals with disabilities. Typically, these programs are geared toward serving families with assets that require protection from means-tested programs such as Medicaid, rather than low-income families or individuals receiving welfare benefits. While there are a few IDA programs exclusively serving participants with disabilities, these programs currently represent a tiny fraction of all IDA programs nationally.

While individuals with disabilities do not currently have widespread access to specialized IDA programs, they do have access to a national benefits and work incentives counseling service funded by the SSA. This unique service is referred to as Work Incentives Planning and Assistance (WIPA), and it is provided through cooperative agreements with community organizations. The WIPA projects are staffed by trained Community Work Incentive Coordinators who provide individualized benefits planning and assistance services to SSA beneficiaries with disabilities aged 14 to full retirement age. WIPA projects are an important component of asset building for individuals with disabilities because they can provide specific advice about how SSA benefits are affected by earned income. WIPA projects can serve as highly effective partners to AFI grantees in "getting the word out" about the availability and use of IDAs for beneficiaries of SSA disability programs.

Misconception 6: *Our staff simply does not have the knowledge or expertise to adequately meet the needs of IDA participants with disabilities, so it is best not to recruit persons with disabilities into our program.*

- ▶ Successfully serving participants with disabilities in IDA programs is not nearly as complicated or difficult as AFI grantees may think. With a little extra awareness, training, technical assistance, and consultation any AFI IDA project can make its asset building services available to and welcoming of participants with disabilities. There are four actions AFI grantees can take:

- ❑ **Perform effective outreach to individuals with disabilities and disability service providers.** This includes getting the word out to people with

Additional Resources

While individuals with disabilities do not currently have widespread access to specialized IDA programs, they do have access to a national benefits and work incentives counseling service funded by the SSA.

disabilities and service providers about the existence of AFI IDAs, how they can benefit individuals with disabilities and how IDA funds are treated by SSA disability benefits and other federal income support programs.

- ❑ **Ensure unfettered access to AFI IDA services.** This includes making sure facilities are fully accessible to individuals with mobility limitations or sensory impairments such as blindness. It also means that the processes from initial application onward are fully usable by everyone and create no barriers or impediments.
- ❑ **Support IDA participants with disabilities to successfully complete IDA programs.** AFI IDA projects may need to make accommodations when assisting participants with disabilities as they work to achieve their asset building goals. An individualized approach, in which the person with a disability is consulted about what accommodations he or she may need, should allow virtually all individuals with disabilities to successfully participate in IDA programs.
- ❑ **Accommodate the unique needs of persons with disabilities in required financial literacy programs.** Financial literacy curricula for people with disabilities need to include benefits literacy - that is, a basic understanding of the public income maintenance programs a person receives. In addition, classroom - based financial literacy training programs may need to be adapted to suit individuals with intellectual disabilities or participants who are blind or deaf and should be physically accessible. Again, the key is awareness of accessibility issues and a willingness to be flexible.



Emily, Community
Vision, Inc

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Background on the Assets for Independence (AFI) Program

About Assets for Independence (AFI)

Background on AFI

Assets for Independence (AFI), which is administered through the Office of Community Services (OCS), enables community-based nonprofits and government agencies to implement and demonstrate an assets-based approach for giving low-income families a hand up out of poverty.

Assets for Independence (AFI), which is administered through the Office of Community Services (OCS), enables community-based nonprofits and government agencies to implement and demonstrate an assets-based approach for giving low-income families a hand up out of poverty. AFI projects help participants save earned income in special-purpose, matched savings accounts called Individual Development Accounts (IDAs).

An IDA is a bank account that allows individuals and families to save money and eventually acquire an economic asset to build long-term financial stability. Every dollar in savings deposited into an IDA by participants is matched (from \$1 to \$8 combined Federal and nonfederal funds) by the AFI project, promoting savings and enabling participants to acquire a lasting asset. AFI project families use their IDA savings, including the matching funds, to achieve any of three objectives: acquiring a first home; capitalizing a small business; or enrolling in postsecondary education or training).

The projects typically have several additional components including financial education, assistance with saving money, counseling on financial issues, and support in obtaining any of three assets. Participants may also save funds for transfer to a dependent.

For more information on the AFI program, please visit the Office of Community Services (OCS) [AFI website: http://www.acf.hhs.gov/programs/ocs/afi/index.html](http://www.acf.hhs.gov/programs/ocs/afi/index.html) or the IDA Resources website: <http://www.idaresources.org>.

How to Become an AFI Grantee

The Assets for Independence (AFI) program provides five-year grants to nonprofit organizations and government agencies that empower low-income families to become economically self-sufficient for the long-term. Grantees provide financial education training on money management issues, and they assist participants with saving earned income in special matched savings accounts called Individual Development Accounts (IDAs). Participants use the IDAs to accumulate funds with the goal of acquiring a first home, post-secondary education, or starting up or expanding a small business.

Is The AFI Program Right for Your Organization?

Features of AFI Projects

The U.S. Department of Health and Human Services (HHS) awards about 60 AFI grants each year. Grants go to a variety of organizations to help them fund IDAs and other asset building strategies. The average grant is \$280,000 and covers 5 years. Grantees customize their AFI projects to meet the needs of the populations and geographic areas they serve.

Participating Organizations

Many types of organizations administer AFI projects, including:

- ▶ Nonprofit entities that are certified under Section 501(c)(3) of the IRS code
- ▶ State, local, and tribal government agencies applying jointly with nonprofit organizations
- ▶ Community Development Financial Institutions that partner with community-based antipoverty groups
- ▶ Low-income credit unions that partner with community-based antipoverty groups
- ▶ Consortia of organizations and agencies that target multiple service areas.



Justin & Martha, AAA Fair Credit Foundation

How the AFI Program Works for Grantees

Non-Federal Funds

Each AFI project must include non-Federal cash funding in an amount at least equal to the AFI grant. Grantees may draw down their Federal grant award in increments, up to an amount equivalent to their non-Federal cash contributions. Both Federal and non-Federal dollars are held in a bank account owned by the grantee. At least 85 percent of the AFI grant and the required non-Federal cash must be used to match IDA savings; no more than 13 percent may be used for financial education and other activities; and at least 2 percent must be available for data collection for the HHS-supported research on the effects of IDAs and impacts of the AFI program.

Do IDA Programs Really Work?

HHS-supported research shows that AFI project participants derived substantial benefits from using IDAs and related services.

For example, by the end of the third year after opening an IDA:

- ▶ the homeownership rate rose by 17.8 percent, to 41.2 percent;
- ▶ the percentage of business owners rose by 8.3 percent, to 24.1 percent; and
- ▶ 46.3 percent of participants had engaged in some postsecondary classes or coursework, including college and vocational or technical training.

Comparisons to a corresponding national sample of demographically matched, AFI-eligible nonparticipants showed that AFI savers were much more likely to be homeowners or business owners, or to pursue postsecondary education.

AFI Contact Information

Request an Application Kit: Request an application kit and ask your questions! Send an email note to info@idaresources.org or give us a call on 866-778-6037.

AFI Resource Center

Telephone: 1-866-778-6037

E-mail: info@idaresources.org

Federal AFI Contact

Assets for Independence Program
Office of Community Services
370 L'Enfant Promenade, S.W., 5th Floor
Washington, DC 20447

Telephone: 1-866-778-6037

Fax: 202-401-5648

E-mail: afiprogram@acf.hhs.gov

Background on the AFI Serving People with Disabilities Initiative

Special Initiative

Because this population has so much to gain from utilizing asset building approaches such as IDAs, beginning in 2006 the Office of Community Services (OCS) within the U.S. Department of Health and Human Services Administration for Children and Families (ACF) funded an initiative on better serving people with disabilities.

While the importance of asset building in anti-poverty efforts has grown in the welfare arena and among other low-income groups, it has received relatively little attention in the disability community. Because this population has so much to gain from utilizing asset building approaches such as IDAs, beginning in 2006 the Office of Community Services (OCS) within the U.S. Department of Health and Human Services Administration for Children and Families (ACF) funded an initiative on better serving people with disabilities.

In the Initiative, OCS sought to increase the capacity of grantees to provide IDAs and other asset-building services to people with disabilities and their families. By providing technical assistance and information to AFI grantees, supporting a community of practice, and launching additional pilot sites, the next phase of the Initiative facilitated more people with disabilities participating in asset building opportunities and moving towards asset ownership and financial self-sufficiency.

The Initiative sought to:

- ▶ *Increase the availability of AFI IDAs and other effective asset building services to people with disabilities and their families;*
- ▶ *Demonstrate new strategies for making IDAs and other asset-building tools more accessible to people with disabilities; and*
- ▶ *Ensure that AFI grantees and the broader asset building community have access to high quality training and information on serving people with disabilities.*

The Initiative was administered through the AFI Resource Center. Key activities included:

- ▶ Delivering high quality training for all AFI grantees and the broader asset building community on topics related to serving people with disabilities (e.g., current policies, laws, program designs and how to improve them, and barriers that prevent people with disabilities from using IDAs or other currently available asset building resources).
- ▶ Developing effective practice articles and fact sheets that highlight strategies, issues, and opportunities for providing asset building services to people with disabilities and their families.
- ▶ Developing and continuing to add to a website (IDAreources.org) for sharing information with the grantee community.
- ▶ Launching pilots that bring together AFI grantees with disability service providers, such as Family Support 360 sites, WIPA sites, and Vocational Rehabilitation. These pilots are located in Connecticut, Indiana, New York, Oregon, Utah, Virginia, Washington, and Wisconsin.

Disability Service Provider Agencies and Working with People with Disabilities

Disability Service System

The disability service system is highly complex and involves a variety of federal, state and local agencies.

What AFI Grantees Need to Know about the Disability Services System

The purpose of this article is to provide specific answers to common questions that AFI IDA grantees may have about the system of services available to individuals with disabilities, as well as what help these services can provide to IDA program staff and potential participants as they work to achieve savings goals. This document does not provide detailed descriptions of the various agencies that serve persons with disabilities. For that information, refer to the factsheets available in this toolkit and on our website. Instead, this article focuses on broader questions that cut across the various disability service agencies.

QUESTION: *The disability service system seems really confusing! How do AFI grantees go about getting the information they need to help IDA participants with disabilities?*

The disability service system is highly complex and involves a variety of federal, state and local agencies. Each agency has its own distinct eligibility criteria, menu of services, and restrictions on what assistance can be provided. Like many other government programs, it is not a coherent or coordinated "system", but rather a loose affiliation of multiple systems and agencies.

To start, it is important to understand the two main categories of systems/agencies you will encounter that serve persons with disabilities. These categories are:

Disability-Specific Systems—These agencies generally provide a wide range of services to persons who meet the definition of a specific disability. For example, the mental health system may provide psychiatric services, mental health counseling, residential support or even employment services to certain individuals who have mental illnesses. Similarly, the intellectual disability/developmental disability system generally provides a multitude of services to persons who meet the definition of having an intellectual disability or a developmental disability, including case management, residential support, vocational training, or supported employment. In addition to these relatively large state systems, there are also smaller agencies such as the Spinal Cord Association, the Brain Injury Association, or the Down's Syndrome Association, which often provide a more limited menu of services to more narrowly defined populations. In some cases, individuals may meet the eligibility criteria to receive services from multiple systems or agencies simultaneously.

Service-Specific Systems—These agencies typically serve persons with many different types of disabilities, but only provide one type of service, or a group of related services. For

example, State Vocational Rehabilitation Agencies provide services across many different disability types, but their services focus primarily on preparing for, obtaining, and maintaining paid employment. Similarly, Work Incentives Planning and Assistance (WIPA) programs may serve anyone between the ages of 14 and full retirement age who receives Social Security Administration (SSA) benefits based on disability. However, WIPA services are limited to counseling individuals on benefits issues related to employment. Again, some individuals will meet the eligibility criteria of multiple agencies and may be served by several agencies simultaneously.

It will take time to get to know all of the agencies involved in serving persons with disabilities in any given community. The best way to begin is by conducting initial research in the local area to find out what agencies exist in each of the two broad categories identified above. Grantees may be able to find listings of disability service organizations on the internet (for example, many government websites have search capabilities to find local providers), in the phone book, or even by contacting umbrella groups such as the United Way or disability advocacy organizations. AFI grantees need to know a few basic facts about each agency located in their area, such as who they serve, what specific services they provide, and what restrictions or limits they place on services. Additionally, when working with IDA participants with disabilities, it is helpful to ask which agencies they are/were involved with or getting services from, and to then make contact with these agencies.

QUESTION: *How can AFI grantees work with disability services providers to increase the number of people with disabilities who are referred to IDA programs?*

The reason relatively few people with disabilities are referred to IDA programs is that disability services providers are generally unaware that IDA programs exist, or how they operate. To increase referrals, AFI grantees will need to reach out to the disability services community and provide education about the benefits of participating in IDA programs.

- ▶ Since AFI IDAs require that income from employment or self-employment be used for savings, AFI grantees may want to focus their initial outreach efforts on agencies that provide employment services and supports to individuals with disabilities, such as vocational rehabilitation. In addition, AFI grantees should make a concerted effort to meet with WIPA projects or any other agencies which provide counseling on disability benefits. These programs have contact with hundreds of disability beneficiaries each year - most of whom are either already employed, are actively seeking employment, or seriously considering employment. Local Community Work Incentive Coordinators (CWICs) - individuals who are trained on the Social Security disability benefits, other federal income support programs, and the effect of earned income on these benefits - can provide important assistance to AFI grantees in terms of getting the word out about IDA programs and how they can benefit persons with disabilities.

QUESTION: *IDAs require that a person saves earned income. Which agencies can help people with disabilities get jobs, or help individuals maintain employment over time?*

The best place to start is with the State Vocational Rehabilitation Agency. The Rehabilitation Act of 1973 (PL 93-112) as amended, provides funding to states to provide comprehensive Vocational Rehabilitation (VR) programs for individuals with disabilities. In some states services for individuals who have blindness fall under the general VR umbrella; in other states there is a separate agency that provides employment services to individuals who are blind. Every state has a VR system, and the goal of services is to assist individuals with disabilities to obtain and/or maintain employment. In general, to be eligible for VR services an individual must have a disability that results in a substantial barrier to employment and there must be an expectation that VR services will assist the individual to obtain or maintain employment. In some states, the VR program is operating under "order of selection," which means that eligibility for services is more restrictive, with individuals with more severe disabilities being served first. IDA personnel need to check with their State VR Agency to find out exactly what the eligibility requirements are for that state.

State VR agencies provide numerous services and supports which help prepare individuals with disabilities for a career, help them secure employment or self-employment, and can even provide some assistance with maintaining employment over time. Individuals with disabilities are assigned a VR counselor, who helps them determine a career goal and develop a plan for achieving that goal. The VR Counselor will help arrange and pay for items or services individuals need to achieve their career goals. This may include educational assistance, help financing a small business start-up, and purchasing job placement, or supported employment services, to name a few. States differ in terms of the services or items that can be paid for, so AFI grantees need to contact their State VR agency to find out what assistance can be provided for a specific person.

In addition to assisting the potential savers in obtaining employment, VR provides vocational counseling services that can work in conjunction with the case management AFI providers offer. VR counselors are familiar with the majority of organizations that provide vocational support and services to individuals with disabilities in a given community and represent a wonderful source of information and referral. In addition, the VR counselor may provide consultation on a variety of disability issues such as assistive technology, accommodations, and advocacy. For more information about the VR system, see the companion fact sheet in this toolkit and on our website.

Another potential source of assistance related to employment or self-employment is the One-Stop Career Centers operated by the Local Workforce Investment Boards using funds provided by the State and Federal Departments of Labor. One-Stop Career Centers offer assistance with job search activities and in some cases can provide limited amounts of funds to pay for education or training. To find out what specific services are available in a given community, contact the Local Workforce Investment Board. For more information on state and local workforce investment boards, go to <http://www.servicelocator.org/wibcontacts/>.

Assistive Technology Programs

Assistive technology programs can assist AFI grantees with information on where to secure assistive technology, equipment and devices where appropriate.

In 2002 Social Security Administration and Department of Labor funded the Disability Navigators positions that are located in some local One-Stop Centers. The Disability Navigators position is intended to better inform individuals with disabilities about work support programs available at One-Stop Career Centers and how to navigate the different systems. They can be a tremendous information source for both the AFI grantee and the potential saver in understanding the myriad programs that can provide assistance. They can also assist by referring individuals to community programs and resources. For more information about One-Stop Career Centers, see the companion fact sheet found on this site.

Finally, most local areas will have a number of independent Community Rehabilitation Programs (CRPs) that provide vocational rehabilitation, training, and employment services to persons with disabilities. These smaller agencies are often funded by the State VR agency to deliver services to VR clients, but many have other sources of funding which allow them to serve additional people, or provide services for which the State VR agency will not pay. These agencies may include Goodwill Industries, Easter Seals, programs affiliated with United Cerebral Palsy, Centers for Independent Living, as well as other private non-profit agencies such as sheltered workshops or supported employment agencies. Many of the CRPs provide very intensive and individualized vocational services and may be able to provide valuable support to AFI grantees in providing IDA case management. To locate the CRPs in any given area, check with the State VR agency. Most VR counselors will know what independent agencies exist, whom they serve, and what services they provide.

QUESTION: *Where can IDA projects turn for help when participants with disabilities need accommodations or assistive technology?*

A good place to start is with the State Assistive Technology Program. The Assistive Technology Act of 1998, as amended, supports grants to States to address the assistive technology needs of individuals with disabilities. Every state has a State Assistive Technology Program that offers comprehensive statewide technology-related assistance. These programs offer a wide range of services such as assistive technology loan programs, demonstration programs to teach people how to use assistive technology, and help with purchasing assistive technology or adaptive equipment. Assistive technology programs can assist AFI grantees with information on where to secure assistive technology, equipment and devices where appropriate. To learn more about the Technology Program in your state go to: <http://www.resna.org/taproject/at/stateprograms.html> or refer to the companion fact sheet on assistive technology on this site.

Another extremely helpful online resource for information on accommodations and assistive technology is the Job Accommodation Network (JAN). JAN is a free service of the Office of Disability Employment Policy at the Department of Labor. JAN is designed to increase the employability of people with disabilities by providing individualized worksite accommodations solutions, providing technical assistance regarding the ADA and other disability-related legislation, and educating callers about self-employment options. Their phone number is 800-526-7234 (V) or 877-781-9403 (TTY).

Finally, there are local sources of information about and consultation on assistive technology. The State VR agency typically has rehabilitation engineers on staff who can help evaluate the need for assistive technology, determine which devices or equipment best meet the presented needs and assist individuals with learning to use the technology. In addition, the local Center for Independent Living may also offer services related to physical accommodation including assistive technology and adaptive equipment. Centers for Independent Living vary from state to state, so AFI grantees will need to contact the local Center for Independent Living to find out which services are available in their communities. For more information about Centers for Independent Living, refer to the companion fact sheet on this site.

QUESTION: *I know that many people with disabilities get benefits from the Social Security Administration (SSA). Where can AFI grantees get assistance for participants who have questions about how work affects these benefits or how IDAs will be treated?*

SSA funds a national initiative known as Work Incentives Planning and Assistance (WIPA). Every State and territory is covered by WIPA projects that are staffed by individuals who are trained on the Social Security disability benefits, other federal income support programs, and the effect of earned income on these benefits: Community Work Incentive Coordinators or CWICs. They can meet with potential savers to explain how to effectively use work incentives to augment savings. They are also knowledgeable about the rules related to State programs such as food stamps, general assistance, and Medicaid waiver services. Their comprehensive knowledge of State and Federal benefit programs can assist an individual in developing an effective benefits plan. For more information about WIPA services please see the fact sheet and articles in this toolkit and on our website.



Geoff, Vocational Rehabilitation

WIPA projects may also be able to help AFI grantees provide financial literacy training and support. An important component of financial literacy for persons with disabilities is "benefits literacy." This means understanding how to manage disability benefits effectively and how to handle the changes that occur due to income from a job or self-employment. Specifically, the local CWIC may be able to provide benefits literacy education as a piece of the general financial literacy that AFI grantees provide to all IDA participants.

Finally, as an integral part of the community employment system for individuals with disabilities, WIPA projects are also well positioned to assist AFI grantees with conducting outreach and education to the disability agencies. Disability service providers are likely to have concerns about the potential negative effects of IDA participation and savings on an individual's disability benefits, food stamps, or health care coverage such as Medicare or Medicaid. Having a CWIC on board and as your partner in initial outreach and education with other disability service organizations can help address any myths or concerns these provider agencies may have, making it more likely that agency staff consider IDA participation as a viable and profitable option for the people they serve.

QUESTION: *Where can IDA projects access help with providing IDA case management supports?*

There are many agencies that provide case management or services coordination as a part of their menu of services. What AFI grantees need to remember is that state systems will vary from one another and individual agencies in a given area will vary as well. In addition, the term "case management" does not mean one thing to all agencies and all disability services personnel. Some agencies may not say that they provide case management at all, but the services they do deliver are so individualized that the same type and intensity of supports are provided. Below is a brief summary of where AFI grantees can expect to find ongoing supports that will complement or add strength to their IDA case management:

Agencies that provide formal "case management services." In most states, the mental health system and the intellectual disability/developmental disability system offer some form of traditional case management. This service may be reserved for individuals with the most significant disabilities, or those who have access to a source of payment for this service. In the mental health system, case management is often provided to individuals with severe mental illness and is generally paid for using Medicaid funds. In the MR/DD systems, there is wide variation in terms of when, how and to whom case management services are provided.

Agencies that provide ongoing supports similar to case management. This category includes agencies providing residential services and supported employment services. While these agencies may not advertise their services as "case management," they do have regular, ongoing contact with the individuals they serve and have staff available to help support IDA savings goals. There will generally be a single staff person assigned to assist the potential saver and that person may help with a wide range of needs or issues the individual may have. When working with persons with cognitive disabilities in particular, these agencies can be of great help to AFI grantees as they may have long standing relationships with both the saver and his/her family members.

Agencies that have time-limited contact with individuals. The State VR agency would be a good example of this category. The assigned VR counselor will have ongoing contact with potential savers for a limited period of time while that individual prepares for employment and works to secure a job or self-employment. Typically, State VR agencies will stop providing services once the individual is considered to be stable in employment - generally about 90 to 120 days. While VR counselors do not provide "case management" per se, they certainly can help AFI grantees by supporting participants to achieve their savings goals. Another example in this category would be WIPA projects. CWICs will have regular or periodic contact with beneficiaries who are working and using work incentives, but this contact would typically not go on indefinitely. WIPA personnel may also lend their support to AFI grantees in resolving any barriers to meeting the saving goals, particularly with benefits literacy and financial literacy activities.

QUESTION: *What are some steps AFI grantees could take to start building partnerships with disability services agencies?*

As previously stated, it is important that AFI grantees ask participants with disabilities which agencies they are involved with and get the names and contact information of the staff persons who work with them on a regular basis. It is also important to understand that many persons with mental illness and/or cognitive disabilities may have a "representative payee" who is responsible for helping the individual manage their SSA disability benefits. The representative payee may be a relative, a friend, a case manager or other disability services staff. Some agencies offer formal representative payeeship services as part of their regular programming. IDA staff will need to work closely with the representative payee on all financial matters to make sure that all matters are coordinated appropriately.

The first step is for AFI grantees to get out into the community and start meeting with disability services agencies. The purpose of these meetings is to establish collaborative relationships in which each party benefits from and provides assistance to the other in meeting their shared goals. AFI grantees should explain how IDAs work, how people with disabilities can participate, and what benefits they will gain. The goal is to demonstrate that IDA programs promote the same positive outcomes that the disability service agencies seek - lives of greater self-sufficiency for people with disabilities. In return, AFI grantees need support from the disability service providers in order for participants with disabilities to meet their savings goals. AFI grantees need to clearly articulate what assistance they require and discuss specific ways that disability service agencies can help. Each party has something to offer the other and each party will benefit by working cooperatively together.

Disability Service Providers—Potential Partners

Vocational Rehabilitation

VR services are individualized and designed to focus on the unique strengths and skills of the person. The mission of state VR programs is to assist individuals to become self-sufficient through employment or self-employment.

State Vocational Rehabilitation Agencies

"VR agencies are familiar with many of the organizations that provide support and services to individuals with disabilities in a given state."

Overview

The Rehabilitation Act of 1973 (PL 93-112), as amended, provides funding to states to provide comprehensive Vocational Rehabilitation (VR) programs for individuals with disabilities. Every state has a VR system and the goal of services delivered through this system is to assist individuals with disabilities to obtain and/or maintain employment. To be eligible for VR services, an individual must have a disability that results in a substantial barrier to employment. Additionally, there must be an expectation that VR services will assist the individual to obtain or maintain employment. Priority for receiving services is given to those with the most significant disabilities when there are limited resources.

State VR agencies offer a wide array of services to eligible individuals, including counseling; guidance and job placement services, vocational and other training, including higher education; and the purchase of tools, materials and books and technical assistance for those who are pursuing telecommuting, self-employment or small business operation.

Every client of VR services has a vocational rehabilitation counselor who helps the individual develop an Individual Plan for Employment (IPE) that will lead to the person becoming employed.

How VR Can Assist AFI Grantees Working with Individuals with Disabilities

VR services are individualized and designed to focus on the unique strengths and skills of the person. The mission of state VR programs is to assist individuals to become self-sufficient through employment or self-employment. This philosophy fits well with the individualized nature of asset development services and the desire to support people in becoming self-sufficient through acquiring assets. VR clients also have earned income that can be deposited into an IDA.

Information and Referral

VR agencies are familiar with many of the organizations that provide support and services to individuals with disabilities in a given state. VR staff can provide information about and connections to these disability organizations, as well as consultation on a variety of disability issues. For example, VR counselors have expertise in and can provide information and resources on assistive technology, accommodations, benefits planning, and advocacy. VR agencies can provide referrals to local IDA projects.

Shared Cases

With an IPE in place, the vocational rehabilitation counselor can purchase a wide range of services and items an individual may need to obtain or maintain employment or self-employment. It is possible to combine the VR funds with IDA funds in some cases, depending on the state VR agency rules. For example, VR could pay for certain items an individual needed to start a small business while IDA funds were used to pay for other start-up costs. In addition, VR funds could be used to pay for a portion of post-secondary education costs with the IDA funds picking up any remaining expenses.

Support in Understanding the Effect of IDAs on an Individual's Benefits

Some, but not all VR agencies have professionals who understand Social Security or other state benefits and the effect of work and earnings on these benefits. AFI grantees can request VR staff to assist them in understanding the myriad rules and programs so that an individual does not jeopardize his or her benefits when participating in an IDA program. VR counselors will also be familiar with other sources of benefits or work incentives counseling in the local area and will make referrals to these agencies as needed.

Possible Match Funding

Some VR agencies understand the importance of asset development for their clients and are willing to put up some of the match for IDAs. For example, the Mississippi VR agency used their Innovation and Expansion dollars to support IDAs for transition-age students with disabilities. Similarly, the Washington VR agency used a portion of their Social Security Reimbursement dollars to support IDAs in two communities.

Education may be Necessary

Not all state VR agencies understand asset development and IDAs. AFI grantees may need to spend time educating state- and local-level VR staff about IDAs and how they can benefit VR clients. One place to start is talking to the Director of their state VR agency to determine how they can work together.

Additional Information is Available

To access contact information for state VR agencies, go to:

["http://www.workworld.org/wwwwebhelp/state_vocational_rehabilitation_vr_agencies.htm"](http://www.workworld.org/wwwwebhelp/state_vocational_rehabilitation_vr_agencies.htm)

One-Stop Career Centers

Overview

One-Stop Career Centers, established as part of the 1998 Workforce Investment Act, are the foundation for the delivery of employment services in a local area. They offer a comprehensive range of workforce development services to job seekers and employers in a single "one stop" location. They are required by law to be universally accessible. A wide array of services are available through the centers, including training, job referrals, technical assistance, education assistance, workshops, career counseling, job listings, access to unemployment insurance and assistance with living expenses while in training, transportation, and other employment-related supports. Job seekers and employers can visit a center in person or access information on their local One-Stop Career Center via the Internet. There are three tiers of job seeker services:

- ▶ *Core Services* include job search and placement assistance, labor market information, initial assessment of skills and needs, information about available services, and limited employment follow-up services. They are available to anyone and are offered in a self-service environment and can be obtained at the center or via the internet.
- ▶ *Intensive Services* include more comprehensive assessments, development of individual employment plans, group and individual counseling, case management, and short-term, pre-vocational services. These services are available to individuals who are not able to find jobs through core services alone.
- ▶ *Training Services* are available to eligible individuals who have met the requirements for intensive services and have not been able to obtain or keep employment. Individual Training Accounts are established to finance training.

How One-Stop Centers Can Assist AFI Grantees

Working with Individuals with Disabilities

AFI programs can work with their local One-Stop Career Centers to jointly serve individuals with disabilities.

Disability Program Navigators

There are myriad programs and complex rules affecting a person with disability's capacity to return to work, have earned income, and acquire assets. All of these elements can affect a person's eligibility for disability programs and benefit levels. Fear of losing cash assistance and health benefits can discourage people with disabilities from working or being involved with asset development programs. One-Stop Career Centers can help IDA participants navigate complex program rules. Many One-Stop Career Centers have a Disability Program Navigator on staff. A Disability Program Navigator can assist with providing accurate information on these complex issues and work with the individual and the AFI grantee to access needed services and support employment and successful IDA participation.

Program Partners

One-Stop Career Centers provide customers with links to many other services that can be of assistance. Many of these employment and related support services are actually co-located at the One-Stop Career Center. These partners have staff on site that can assist with both information and referral. Mandatory One-Stop partners include: Vocational Rehabilitation, employment services funded by the [Wagner-Peyser Act](#), adult education and family literacy, postsecondary vocational education, veterans' services, and unemployment insurance. In addition, One-Stop Career Centers may also partner with programs such as the Temporary Assistance for Needy Families (TANF) program, food stamps, and employment and training programs. In most states TANF personnel are very familiar with IDAs.

Additional Information is Available

To find One-Stop Career Center services in your state or local area and to learn more about One-Stop services and activities, go to: <http://www.careeronestop.org/>. To learn more about Disability Navigators go to: http://www.doleta.gov/disability/new_dpn_grants.cfm

State ID/DD Agencies

State Intellectual Disability/Developmental Disabilities (ID/DD) agencies work cooperatively with local governments, voluntary organizations, service providers, and families to provide necessary services for persons with a diagnosis of Intellectual Disability and/or Developmental Disabilities.

State/Local Intellectual Disability/Developmental Disabilities Agencies

Overview

State Intellectual Disability/Developmental Disabilities (ID/DD) agencies work cooperatively with local governments, voluntary organizations, service providers, and families to provide necessary services for persons with a diagnosis of Intellectual Disability and/or Developmental Disabilities. In most states, ID/DD agencies provide or fund an array of services including:

- ▶ Housing and residential supports
- ▶ Day habilitation services
- ▶ Family support services
- ▶ Financial assistance
- ▶ Respite care
- ▶ Transportation
- ▶ Prevention and early intervention programs
- ▶ Case management or services coordination
- ▶ Vocational programs such as supported employment and/or sheltered employment

States define developmental disabilities in a variety of ways, but in general, youth under age 22 can qualify for services if they have had an intellectual disability or a related condition (e.g., cerebral palsy, epilepsy, autism or other neurological conditions). Another commonly referenced definition for a developmental disability is a severe, ongoing, mental and/or physical disability that was present before age 22. It is important to note that some states vary age of onset of disability requirements.

The ID/DD system is guided by a service delivery-planning construct similar to the Individualized Education Plans used in Special Education programs at public schools. The Individual Service Plan (ISP) requires specific services, supports, roles, responsibilities, and timeframes for assisting individuals in meeting their objectives. In most cases, ID/DD practitioners develop the ISP with assistance from counselors, case managers, or others with administrative oversight. Regular and intermittent progress reporting and evaluation is required and conducted under specific state law and regulation. ID/DD agencies are funded in a variety of ways. State general funds are typically allocated for services through state ID/DD agency and a growing portion of funding for ID/DD services comes from Medicaid.

How Intellectual Disability/Developmental Disabilities Services Agencies can Assist AFI Grantees Working with Individuals with Disabilities

State and local ID/DD agencies can be a valuable source of referrals to AFI grantees. Many of these agencies provide vocational rehabilitation or employment services and would be working with individuals who could qualify for participation in an AFI IDA program. Many of these agencies also help individuals with disabilities and their family members plan for goals such as homeownership, small business ownership, or enrolling in post-secondary

education/training programs. Participation in an IDA program would be an excellent way for the individuals served by ID/DD agencies to achieve these important life goals. Although a good potential partner, it is likely that local ID/DD agencies will have little awareness of IDA programs or how they operate. Most individuals with ID/DD receive disability benefits from the Social Security Administration and will be concerned about how participating in an IDA program may affect their benefits. Thus, AFI grantees may need to reach out to these agencies to provide basic information about IDAs and how they may benefit persons with intellectual disabilities or other developmental disabilities.

Additional Information is Available

States vary widely in terms of how the ID/DD service systems are organized. A good place to start is to contact your state's chapter of The ARC. You can find a local chapter by going to: <http://www.thearc.org/NetCommunity/Page.aspx?&pid=183&srcid=-2>

Centers for Independent Living

"Many CILs are a source of training for AFI grantee personnel on a wide range of disability issues."

Overview

Centers for Independent Living (CILs) are consumer-controlled, community-based, cross-disability, non-residential, private nonprofit agencies that are designed and operated within local communities by individuals with disabilities. These agencies provide an array of services that support independent living. At a minimum, CILs are required to provide the following core services:

- ▶ Information and referral
- ▶ Independent living skills training
- ▶ Peer counseling, and individual and systems advocacy

Most CILs are also actively involved in one or more of the following activities: community planning and decision making; school-based peer counseling, role modeling, skills training; working with local governments and employers to open and facilitate employment opportunities; interacting with local, state, and federal legislators; and staging recreational events that integrate individuals with disabilities with their non-disabled peers. Many CILs also provide vocational services such as job development and placement. Some CILs are actively involved in benefits counseling and a significant number of Work Incentives Planning and Assistance (WIPA) projects are operated by CILs (see related fact sheet).

The Centers for Independent Living program is funded and administered by the Rehabilitation Services Administration (RSA) within the U.S. Department of Education. This program provides support for the planning, conduct, administration, and evaluation of CILs that comply with the standards and assurances in Sec. 725 of the Rehabilitation Act, consistent with state plans for establishing statewide networks of centers.

How Centers for Independent Living can Assist AFI Grantees Working with Individuals with Disabilities

CILs can assist AFI grantees in a number of ways. First, many CILs provide expert information and consultation about accessibility. This may include a site survey to identify possible physical accessibility barriers, as well as a review of program operations to identify ways to improve the accessibility of services. CIL staff members are well versed in all disability areas and can help AFI grantees implement accommodations which ensure unfettered access to IDA services for all customers who experience disabilities.

Secondly, many CILs are a source of training for AFI grantee personnel on a wide range of disability issues. This may include disability awareness, using "people first" language, rights and responsibilities under the Americans with Disabilities Act (ADA), strategies for accommodating disabilities, as well as other disability issues.

Third, CILs can be an excellent source of referrals to AFI grantees. Many Centers provide employment services and supports and will be working with numerous individuals with disabilities who have earned income to fund an AFI IDA. CILs also help individuals with disabilities plan for goals such as homeownership, small business ownership and enrolling in post-secondary education. Participation in an IDA program would be an excellent way for the individuals served by CILs to achieve these important life goals.

Finally, many CILs provide benefits counseling services. These services can help AFI IDA participants with disabilities understand how participation in an IDA program will affect public disability benefits.

Additional Information is Available

To find the Centers for Independent Living in your state or local area and to learn more about the services provided by your local CIL go to: <http://www.ncil.org/directory.html>

Work Incentive Planning and Assistance (WIPA) Programs

Overview

Work Incentive Planning and Assistance projects, or WIPAs, are local organizations that have arranged with the Social Security Administration (SSA) to provide information and planning services about work and work incentives to Social Security Disability Insurance (DI) and Supplemental Security Income (SSI) disability beneficiaries. There are currently 103 WIPA projects providing services to beneficiaries in every State and Territory. The goal of the WIPA Program is to help people who get disability benefits from SSA understand how work would affect their disability benefits so that they can make informed choices about employment.

All DI and SSI disability beneficiaries ages 14 to 65 are eligible for WIPA services. It is not a requirement that the beneficiary be working, or even have decided to work, to get WIPA services.

Each WIPA Project has trained Community Work Incentives Coordinators, or CWICs, who work with beneficiaries to:

- ▶ Answer questions about how part-time, full-time, or seasonal work would affect their individual disability benefits and other benefits they may receive from federal, state, or local programs.
- ▶ Answer questions about how work would affect their Medicaid or Medicare health insurance.
- ▶ Answer questions about SSA work incentives and work incentives of other programs.
- ▶ Discuss individual employment goals, including possible barriers to employment and the resources or services needed to overcome any barriers. A WIPA can also help beneficiaries find and connect with those resources and services.
- ▶ Help plan how to use work incentives or other benefits to achieve and support their employment goals.
- ▶ Help beneficiaries work with their local Social Security office to put in place the work incentives they need.
- ▶ Help beneficiaries use their "Ticket to Work" and find an "Employment Network" that is right for them. The Ticket to Work Program offers SSA disability beneficiaries greater choice in obtaining the services they need to help them go to work and achieve their employment goals. It provides a way to pay for the services and supports beneficiaries need to achieve their work goals. Employment Networks are agencies that help beneficiaries by providing the services and supports needed to become employed.
- ▶ Provide information on the availability of protection and advocacy services for beneficiaries with disabilities and how to access such services.



Jolene, Work Incentive Planning and Assistance

How WIPA Projects Can Assist AFI Grantees

WIPA projects are a great resource for finding answers to questions that your AFI program and IDA participants may have about how work, earnings, and IDAs will affect SSA and other benefits. CWICs serve as an important member of the employment support team for beneficiaries, and are well positioned to assist AFI grantees in connecting with other helpful organizations in the disability community.

WIPA projects can also direct grantees to other benefits counseling programs or services in their states or localities. In some states, SSA beneficiaries can get help with benefits issues from their vocational rehabilitation counselor or from "Disability Navigators" who work in local One-Stop Career Centers. Since every state is different, the best place to start is by contacting the local WIPA project.

Additional Information is Available

To find the WIPA project in your local area, go to the following link and click on your home state: <http://www.socialsecurity.gov/work/ServiceProviders/WIPADirectory.html>

Working with People with Disabilities

Disability Etiquette Guidelines

Do not focus on the person's disability. A person's disability is just one aspect of who they are. Focus only on the aspects of the disability that are relevant to their success in the program.

Disability Etiquette Guidelines

AFI IDA providers and other asset development partners may have limited experience working with people with disabilities. Here are general guidelines for providing services to individuals with disabilities, as well as language guidelines.

General Guidelines

Respect Personal Property

Canes, wheelchairs, crutches, communication devices, or any other assistive technology should be considered personal property of the individual. Unless given explicit permission, do not touch, use or play with any personal items of a person with a disability. Service animals are not pets. Therefore, do not pet or play with animals until permission is granted from the owner.

Speak Directly to the Individual

Always speak directly to the individual with a disability, not to their companion or language interpreter. If the individual has a disability that affects their ability to comprehend information, make all attempts to communicate information in a way that can be understood. Provide concrete examples and alternative explanations of complex terms. Remember who the participant in the program is and make appropriate accommodations.

Do Not Focus on the Disability

Do not focus on the person's disability. A person's disability is just one aspect of who they are. Focus only on the aspects of the disability that are relevant to their success in the program. People with disabilities have the same interests, motivations, and achievements as the population at large.

Offer to Shake Hands

When introduced to an individual with a disability, you may offer to shake hands. It is acceptable to shake with the left hand. Some individuals may decline your offer.

If You Are Not Sure, Ask Questions

If you are unsure about what an appropriate action should be, ask the individual what he or she prefers. A person with a disability would much rather be asked questions about what the appropriate protocol is rather than be caught in an uncomfortable situation. Be clear in explaining what types of services and classes will be offered and what will be expected of the individual to complete the program. Indicate that asking about the disability and accommodations are in the participant's best interest - you want them to succeed!

However, Do Not Ask about a Person's Disability

Avoid asking overly personal questions about a person's disability; ask only questions that are relevant to the individual's success in the program. If you do ask questions, be sensitive

and show respect. Do not insist on pursuing the questioning if the person does not wish to discuss it. Specific information about the diagnosis, medications, and personal routines are usually not essential to their participation.

Treat Disabled Adults as You Would Any Other Adult

Adults with disabilities appreciate the same respect and treatment as any non-disabled adult. Therefore, only use first names when extending that same level of familiarity to others who are present and for close friends. Never patronize people disabilities or treat them as less intelligent or capable.

Do Not Exclude People with Disabilities from Activities

Do not exclude persons with disabilities from any social or work-related activity because you believe it would be too difficult for them to participate. If the location is inaccessible, make every effort to re-locate to an accessible environment; however, if an accessible location is not available, indicate that to the individual and allow them to request accommodations and choose whether to attend.

Make Conversation

People with disabilities have the same interests as non-disabled people. Make conversation as you would with anyone else. Do not worry about using common phrases such as "See you later" or "I've got to be running along."

Speak with a Normal Tone of Voice

There is no need to speak loudly regardless of a person's disability. If someone needs for you to speak in a louder voice, he or she will let you know.

Be Respectful of Public Disability Accommodations

Be respectful of the rights of people with disabilities to use disabled parking and special seating on buses and subways. Remember that not all individual's requiring accommodations have visible disabilities. For example, back problems and heart conditions frequently require accommodations even though the person's disability may not be apparent.

It is Alright if You Make a Mistake.

As with any other general etiquette issue, when a mistake is made, just apologize and correct the problem, learn from the mistake, and move on.



*Charlie & John,
Community Vision,
Inc.*

Disability Language Guidelines

Use of language is a powerful tool for changing attitudes. However, language can be tricky—it is always changing and different individuals prefer different terminology. The following tips and terms are meant as a basic guide to ease the anxiety that some people feel when communicating with people with disabilities.

❑ Use Person-First Language

Many people with disabilities prefer what is called "person-first" language, meaning refer to the person first, 'a person who is blind,' or a 'person who uses a wheelchair,' or a 'person with a disability.' In a publication on this topic, Access AmeriCorps summarized this concept nicely: "One is a person before one is disabled, people with disabilities are individuals who share a common condition." Furthermore, when referring to a person's disability, use the noun form of disability instead of the adjective. For example, say "a person who has epilepsy" instead of "a person who is epileptic."

❑ Avoid Old Stereotypes

Try to avoid outdated language that supports old stereotypes that imply that people with disabilities are experiencing constant distress and hopelessness. Words to avoid include handicapped, cripple, victim, defective, afflicted, suffers from, invalid, special.

❑ Do not Refer to People who are not Disabled as "Normal"

Avoid referring to those who do not have a disability as "*normal*". It is preferable to use words such as "*non-disabled*" or "*people without disabilities*."

❑ Avoid Confining Adjectives for People in Wheelchairs

Avoid terms like "*wheelchair-bound*" and "*confined to a wheelchair*" since a wheelchair in reality improves access and mobility. Instead use phrases like "*uses a wheelchair*" or "*wheelchair rider*."

❑ Do not Portray People with Disabilities as Superhuman

Using words such as "*brave*" and "*courageous*" implies that skill and achievement by people with disabilities is unusual. Instead, use language that is accurate and non-judgmental. The following table summarizes key language principles.

Disability Vocabulary: Do's and Don'ts	
Affirmative Language	Language to Avoid
person with a disability, people with disabilities, disabled	handicapped, cripple, victim, cripp, unfortunate, defective, handi-capable
wheelchair user, uses a wheelchair	wheelchair-bound, confined to a wheelchair
blind, low vision, partially sighted	blind as a bat, sightless, the blind
mobility disability	deformed, maimed, paralytic, lame
psychologically/emotionally disabled, emotional disorder	the mentally ill, mental, crazy, insane
developmentally disabled, person with a cognitive/intellectual disability	retard, mentally defective

Disability Vocabulary: Do's and Don'ts

birth anomaly, congenital disability	birth defect, mongoloid
a person who is deaf or hard of hearing	suffers a hearing loss, the deaf
person with epilepsy	spastic, epileptic, spaz
speech disability, communication disability	tongue-tied
non-disabled	healthy, normal, whole
non-vocal, a person who is non-verbal	mute, dumb
person of short stature	midget, dwarf
learning disability	slow
chronic illness	suffers from, afflicted, as a patient, stricken with, arthritic

Disability Accommodations

Accommodations are not "one-size fits all". People with disabilities are as individual as the types of disability they have and different people have different strategies for dealing with how their particular disability interacts with their environment.

Asking about Disability: What to Keep in Mind

Introduction

Asking about disability seems simple. When we think about disability, people often think of wheelchair users, blind people with canes or dogs, and deaf people who use sign language. But not all disabilities are so readily apparent. If programs ask the question at all, it is usually whether or not the person receives "disability" income. Other programs do not ask about disability and only bring up the issue of accommodations when a person with a visible disability comes through the door or after a problem arises. Both of these strategies can have negative impacts on the success of your program.

It is important to keep in mind the following:

1. Most disabilities are not visible. The most common disabilities are "back problems" and heart conditions. In programs that serve or target individuals with very low incomes, such as the Temporary Assistance for Needy Families program, there are also much higher rates of learning disabilities and mental health issues.
2. Not all individuals with disabilities will self-disclose their disability. For many people, self-disclosing a disability can be quite difficult because of the perception that disability is equated with weakness. Many individuals are also justifiably concerned about disability discrimination if they disclose.

3. Not all people with disabilities receive public disability benefits. For many reasons, including program complexity, cultural biases, misconceptions about working while receiving benefits, and an extremely long benefit determination process, many people either choose not to receive benefits or are unaware that they may be eligible. For this reason, simply asking whether a person receives "disability" is an inadequate screening tool.
4. Accommodations are not "one-size fits all". People with disabilities are as individual as the types of disability they have and different people have different strategies for dealing with how their particular disability interacts with their environment. A diagnosis is not a prescription for the type of accommodations a person may need.

Access Assessment Intake Form

Knowing about accommodation needs and how to ask the question appropriately from the first interaction can improve individuals' success rates and save practitioners' valuable time by preventing problems that may arise due to lack of understanding. For example, the World Institute on Disability's Access to Assets program formulated a participant intake form, which is based on years of research and evaluation. A copy of the form follows.

- ▶ Notice that the word "disability" does not appear on the form. Many people that have accommodation needs may not readily admit to having a disability, thus the form should not be referred to as the "disability" form.
- ▶ The form should be given to **ALL** prospective participants and can be adapted to fit the capacity of the program. For example, if your program cannot afford and cannot find resources/volunteers to provide certain accommodations, you should not list those services.
- ▶ There are only two questions: one asks what the participant has difficulty doing without any assistance or accommodations. The second question, based on their previous answer, should only list the accommodations that your organization can readily fulfill.
- ▶ Remember that your program is required by law to provide "reasonable accommodations" unless those accommodations prove to be an undue hardship on your organization. (See fact sheet on Physical Access in this toolkit and on our website for more information about reasonable accommodations.)

*Exhibit A: Access Assessment Intake Form*Participant's Name:

Assessment question #1: Some people have difficulty completing tasks in their daily living because of physical, mental or emotional conditions. Which of the following tasks, if any, are difficult for you to accomplish on your own in your daily life because of an underlying condition?



Laura, Community Vision, Inc.

Question #1: Please Check All That Apply

	Physical tasks like walking or sitting
	Understanding directions
	Hearing/understanding spoken words
	Staying focused or keeping on track
	Reading newspaper sized print
	Managing a schedule
	Seeing faces across the room
	Making decisions
	Breathing (due to allergies, etc.)
	Remembering things
	Speaking
	Dealing with relationships
	Holding a pen or typing
	Other
	Expressing yourself on paper
	None of the above

Assessment question #2: *In this program you will need to understand and complete required paperwork, attend required meetings and complete assigned activities. If you need assistance with any program related activities, please indicate all of the types of assistance that you require.*

Question #2: Please <input checked="" type="checkbox"/> Check All Needed Accommodation	
	Wheelchair accessible facilities
	Flexibility because of chronic fatigue
	Special seating arrangements
	Audio-taped materials
	Sign language interpreting
	Personal coaching
	Materials in Braille
	Meeting reminders
	Materials in large print
	Note-takers for regular meetings
	Scent free environment
	Special considerations for medication
	Materials in electronic format
	Other
	Assistance with writing
	None of the above

PLEASE RELAY THE FOLLOWING STATEMENT TO PARTICIPANT: If you need assistance or accommodation at any time in the course of the program, please inform _____ . He or she will discuss how best to provide you with the assistance you need.

Guidelines for Asking About Disability

- ▶ Never discuss a person's disability in front of other people.
- ▶ In a public space or when on the phone, request disability information in writing with a simple check-off box procedure.
- ▶ Offer a private space to those individuals needing assistance filling out forms so that they may discuss their disability if necessary.
- ▶ Make the reasons for asking about the disability very clear, by explaining that disclosure will enable you to provide special services if needed in order to help the person succeed in the program.
- ▶ Understand that disclosure of disability status is strictly voluntary.
- ▶ Share disability related information only with relevant individuals, who directly work with the individual or who will be providing special services, and keep it in a confidential location.
- ▶ Collect only relevant information; an entire health history is not necessary. For example, it would only be necessary to know that a person has visual impairment and needs to sit in the front of the room during financial literacy courses; it would not be necessary to know the person's diagnosis.

Assessing Disability Status

Grantees can likely improve the overall success of their programs by routinely assessing disability status during intake and helping the person determine whether a program accommodation or modification would be helpful to them.

Working with People with Hidden Disabilities in Assets for Independence (AFI) Individual Development Account (IDA) Programs

AFI IDA programs likely already serve many people with disabilities.

- ▶ AFI grantees are currently working with many people with disabilities, although they may not be aware of it. Nearly one in five Americans has a disability (Shriver Center, 2009). Because disability is both a cause and a consequence of poverty, disability is especially common among people with low incomes. Almost 47 percent of people with incomes below the poverty line have one more or more disabilities. This is a higher percentage than are single parents or other characteristics that are often associated with poverty.
- ▶ Nearly one in five Americans has a disability, and almost 47 percent of those with incomes below the poverty line have one or more disabilities.
- ▶ Many participants in public programs for people with low-incomes have disabilities (AFI Resource Center, May 2009). One study estimates that 44 percent of Temporary Assistance for Needy Families (TANF) recipients ages 18 to 64 have disability—three times the prevalence of disability among adults who are not TANF recipients.

Many people have disabilities that are not visible.

- ▶ “Hidden disabilities”—including limiting physical conditions, substance abuse, mental health problems, and learning disabilities—are quite common among TANF beneficiaries (Holcomb & Thompson, 2000). These hidden disabilities are often not obvious, observable, noticeable, or readily identifiable. Other common types of hidden disabilities include asthma, arthritis, AIDS, back pain, cancer, epilepsy, mental retardation, and traumatic brain injury (WDC of Seattle-King County).
- ▶ Unless specifically asked, few people with disabilities identify themselves as having a disability when seeking services. In fact, some people are not aware that they have a disabling condition. Undiagnosed and untreated disabilities are common among low-income and TANF populations.

Screening for hidden disabilities

- ▶ Grantees can likely improve the overall success of their programs by routinely assessing disability status during intake and helping the person determine whether a program accommodation or modification would be helpful to them (NCWD, 2004). In addition, collecting data on people with disabilities, as with data on other populations served, can be useful for program and policy development. It may also be necessary to look for symptoms of hidden disabilities that have been previously undiscovered (NCWD, 2004). Disability awareness training, provided by many local disability organizations, can help staff observe symptoms of disability, in addition to more sensitively work with participants with disabilities.

Screening tools to assess hidden disabilities

The World Institute on Disability provides an *IDA Participant Access Assessment Intake Form* with two multiple choice questions that caseworkers can ask all participants as part of the intake process, and advice on how to ask the questions:

http://www.wid.org/publications/downloads/IDA_intake_form.doc/view

- ▶ It is important to remember that people with disabilities must be treated as individuals. Individuals with the same type of disability may have different accommodation needs and preferences. The best strategy is to ask participants directly what if any accommodations they require or prefer.

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Workforce Development Council (WDC) of Seattle-King County, "Disabilities" webpage, <http://www.seakingwdc.org/workforce/jobseekers-with-disabilities.html>

Information for AFI Grantees on Disability Access & Accommodations

Many IDA and community-based not-for-profit organizations want to serve people with disabilities but are unsure of what is required in order to do so. For example, do they have to meet the Americans with Disabilities Act or the Rehabilitation Act of 1973 access and accommodation guidelines? And if so, what is a "reasonable accommodation"? This fact sheet describes these two key pieces of legislation and the definition of reasonable accommodation.

Americans with Disabilities Act (ADA)

The Americans with Disabilities Act (ADA) was a landmark piece of civil rights legislation passed on July 26, 1990. The ADA prohibits discrimination on the basis of disability in employment, State and local government, public accommodations, commercial facilities, transportation, and telecommunications. The ADA also clearly outlines the provision of reasonable accommodations.

ADA Definition of Disability

To be protected by the ADA, one must have a disability or have a relationship or association with an individual with a disability. An individual with a disability is defined by the ADA as a person who:

- ▶ Has a physical or mental impairment that substantially limits one or more major life activities,
- ▶ A person who has a history or record of such an impairment, or
- ▶ A person who is perceived by others as having such an impairment.

The ADA does not specifically name all of the impairments that are covered.

Title III- Public Accommodations

Title III of the ADA covers businesses and non-profit service providers that are public accommodations, privately operated entities offering certain types of courses and examinations, privately operated transportation, and commercial facilities. Private clubs and religious organizations are exempt from the ADA's title III requirements for public accommodations. Public accommodations are private entities that own, lease, lease to, or operate facilities. The ADA places the legal obligation to remove barriers or provide auxiliary aids and services on both the landlord and the tenant. The landlord and the tenant may decide by lease who will actually make the changes and provide the aids and services, but both remain legally responsible.

Public accommodations must comply with basic nondiscrimination requirements that prohibit exclusion, segregation, and unequal treatment. They also must comply with specific requirements related to architectural standards for new and altered buildings; reasonable modifications to policies, practices, and procedures; effective communication with people with hearing, vision, or speech disabilities; and other access requirements. Additionally,

public accommodations must remove barriers in existing buildings where it is easy to do so without much difficulty or expense, given the public accommodation's resources.

Courses and examinations related to professional, educational, or trade-related applications, licensing, certifications, or credentialing must be provided in a place and manner accessible to people with disabilities, or alternative accessible arrangements must be offered.

Rehabilitation Act of 1973

While not as widely known as the ADA, the Rehabilitation Act offers a number of protections for individuals with disabilities when receiving services from organizations that receive Federal financial assistance. Two sections, 504 and 508, are important for organizations serving individuals with disabilities.

Section 504

Section 504 of the Rehabilitation Act states that "no qualified individual with a disability in the United States shall be excluded from, denied the benefits of, or be subjected to discrimination under" any program or activity that either receives Federal financial assistance or is conducted by any Executive agency or the United States Postal Service.

Each Federal agency has its own set of section 504 regulations that apply to its own programs. Agencies that provide Federal financial assistance also have section 504 regulations covering entities that receive Federal aid (such as AFI grantees). Requirements common to these regulations include reasonable accommodation for employees with disabilities; program accessibility; effective communication with people who have hearing or vision disabilities; and accessible new construction and alterations.

Section 508

Section 508 establishes requirements for electronic and information technology developed, maintained, procured, or used by the Federal government. Section 508 requires Federal electronic and information technology to be accessible to people with disabilities, including employees and members of the public.

An accessible information technology system is one that can be operated in a variety of ways and does not rely on a single sense or ability of the user. For example, a system that provides output only in visual format may not be accessible to people with visual impairments and a system that provides output only in audio format may not be accessible to people who are deaf or hard of hearing. Some individuals with disabilities may need accessibility-related software or peripheral devices in order to use systems that comply with Section 508.

What Does this Mean for AFI Grantees and other Non-profit Organizations?

Technically, the laws apply equally for all businesses, whether for-profit or non-profit. All programs receiving Federal funding are subject to the guidelines of both the Rehabilitation Act and the ADA; those programs not receiving Federal funding are covered by the ADA. These laws extend beyond physical and programmatic accessibility to websites as well. Section 508 of the Rehabilitation Act requires that if an organization receives Federal funding to develop a website, it must be accessible.

For all AFI grantees, the Department of Health and Human Services, Office for Civil Rights (OCR) has developed materials explaining rights, responsibilities and provides examples and further resources for serving people with disabilities.

<http://www2.ed.gov/policy/rights/guid/ocr/disability.html>

Reasonable Accommodation: Questions and Answers

Question: *What is a reasonable accommodation?*

- ▶ Reasonable accommodations are services provided to support the needs of people with disabilities.

Question: *Are they expensive to provide?*

- ▶ Most accommodations are surprisingly inexpensive and easy to provide.

Question: *What are some examples?*

- ▶ Large print materials with a type size of 18 or larger
- ▶ Audio-taped materials
- ▶ Materials on disk or sent by email
- ▶ Meeting Reminders
- ▶ Holding the meeting in a quiet place to enable concentration

Question: *What do Organizations Need to Keep in Mind?*

- ▶ Do not make assumptions about what accommodation an individual may want. Each individual has his or her preferences.

Accommodation Preferences

Do not make assumptions about what accommodation an individual may want. Each individual has his or her preferences.

Question: *What if our organization is not physically accessible?*

- ▶ The key term to remember is "readily achievable." Readily achievable means "easily accomplishable and able to be carried out without much difficulty or expense." What is readily achievable will be determined on a case-by-case basis in light of the resources available.
- ▶ However, there are other ways to accommodate people with disabilities. While not ideal, offering alternatives is not only demonstrating good faith, but also is required by the law. If an individual refuses the accommodation and all reasonable alternatives have been explored, then in most cases the law is not applicable.

Technical Assistance Is Available

The Department of Justice has developed many resources to understand the requirements of the law and offers free technical assistance directly to businesses, non-profit service providers, state and local governments, people with disabilities, and the general public.

<http://www.usdoj.gov/crt/ada/adahom1.htm>

The U.S. Department of Justice also provides information about the ADA through a toll-free ADA Information Line. For general ADA information, answers to specific technical questions, free ADA materials, or information about filing a complaint, call: *800-514-0301 (voice)*. Spanish language service is also available.

Building Partnerships

How AFI Grantees and Disability Service Providers can Collaborate

Ideas for Partnering

Disability services professional can help spread the word about the existence of AFI IDA programs and can encourage individuals with disabilities to participate in these programs.

Disability services professionals have an opportunity to play an important role in collaborating with AFI IDA grantees to support asset development for individuals with disabilities. There are four areas where this collaboration can occur:

1. Helping AFI Grantees Perform Effective Outreach to Individuals with Disabilities

AFI grantees may not have much familiarity with the world of disability services and may have little or no experience working with individuals who experience disability. Because of this, they can really benefit from partnering with agencies that have expertise in this area. This includes getting the word out in the disability community about the existence of AFI IDAs, how they can benefit individuals with disabilities and how IDAs are treated by SSA disability benefits and other federal income support programs. Disability services professional can help spread the word about the existence of AFI IDA programs and can encourage individuals with disabilities to participate in these programs.

Similarly, there may be current AFI IDA participants who have disabilities, but who are not connected with any service providers. The AFI grantees need to know which agencies are in the community and what services they provide. It may be helpful to work out a process of referring individuals between the two organizations to ensure that participants are afforded access to all of the supports they need to be successful in the IDA program.

2. Supporting IDA Participants with Disabilities to Successfully Complete IDA Programs

There will be some things AFI grantees may need disability service professionals help with when assisting IDA participants who have disabilities as they work to achieve their asset building goals. For example, if a participant loses his/her job there may be no earned income to contribute to the IDA. Disability services professionals will know which agencies assist with job placement, or provide essential employment services and support to help individuals maintain employment over time. A referral made to these agencies at the right time could make all the difference in successful completion of the IDA program.

Disability services professionals can also provide valuable behind the scenes support to make sure barriers to successful IDA participation are avoided or overcome. Services such as case management or supported employment can be leveraged to resolve problems associated with child care, transportation, health care, accessibility issues, and much more. There will be barriers that individuals with disabilities encounter that are completely related to the disability that can only be handled by a professional with experience in the area. By working in partnership with the AFI grantee, all the skills and competencies needs for success will be brought to bear.

3. Helping AFI Grantees to Accommodate the Unique Needs of Persons with Disabilities in Required Financial Education Programs

Traditional classroom-based financial education training programs used by some AFI grantees may need to be adapted to suit individuals with intellectual disabilities or participants who are blind or deaf. AFI grantees may need help from the disability services community to identify areas where changes might be needed. In addition, disability services professionals can offer advice and technical assistance on effective methods for making changes that accommodate the needs of all participants.

Financial education for a person with a disability includes an additional process of managing the public benefits – a process commonly referred to as "benefits literacy." This involves all the reporting of income, resources, and living arrangements associated with the Supplemental Security Income (SSI) program. This skill set includes learning how to communicate with the Social Security Administration and understanding how income is supposed to affect disability benefits. Monitoring disability benefit payments and work incentives is really complex and time consuming. This skill set may also involve working with other agencies if supplemental nutrition assistance program (SNAP), housing assistance or other forms of public income support are received. Dealing with the financial issues surrounding benefits can be a full time job in and of itself. Disability services professional can be of tremendous assistance with providing this additional piece of financial education training which AFI grantees will likely have very little experience.

4. Helping AFI Grantees Understand how Participation in an AFI IDA Affects SSA Disability Benefits

Finally, it is also likely that AFI programs may have misconceptions about the effect of IDA participation on Social Security Disability benefits. The AFI grantees may have heard stories about the complexity of the Social Security Disability benefit programs, and may even have received guidance that IDA participation for SSDI and SSI beneficiaries is not possible or beneficial. A few of the more common concerns are that people with disabilities who receive these benefits are not able to work and thus cannot contribute earned income to an IDA, that they are prohibited by SSA program rules from acquiring assets, and that they will lose their benefits if they contribute to an AFI IDA. In an effort to do no harm to beneficiaries, AFI providers may discourage participation in an IDA by people with disabilities.

The reality is that Social Security Disability beneficiaries are wonderful candidates for AFI IDAs. The Social Security Disability program rules actually favor IDA participation and provide numerous opportunities for beneficiaries to build assets for their future without jeopardizing essential benefit supports. Additionally, these disability benefit programs provide an array of incentives and supports to work. The SSI program, in particular, is very work friendly. Many beneficiaries of these programs can and do work, and thus can contribute to an IDA.

Although the program rules are very IDA friendly, they are not well known or understood by the asset development community. Consequently, assisting AFI grantees to understand the basics of these Social Security rules pertaining to work, earnings, and IDAs is an important step towards encouraging and supporting the participation of Social Security beneficiaries.

An important task you can accomplish is connecting the AFI grantee with the local Work Incentives Planning and Assistance (WIPA) project, or other agencies with expertise in benefits counseling. This connection is important because another collaborative activity involves providing ongoing benefit and work incentive support as needed to beneficiaries participating in IDAs. There are a number of instances when this might be needed, including the point in time that IDA participation begins. SSI beneficiaries in particular are likely to need assistance in assessing the effect of their IDA participation on cash payments and may also need support in ensuring that SSA deducts their IDA contributions from earnings in calculating their payment amount. Ongoing assistance will also be needed by beneficiaries in planning and implementing Social Security and other work incentives in combination with their IDA. This is particularly true for beneficiaries using a PASS in combination with IDA. Finally, supports are likely to be needed when IDA emergency withdrawals are accessed or when a beneficiary doesn't successfully complete their IDA and earnings contributions are returned.

For more information, please view our webinar on Outreach and Partnering with the Disability Community, found under "Disability Webinars" on www.idaresources.org/disability.



Outreach and Partnering with the Disability Community

AFI Resource Center

October 12, 2010

Assets for Independence (AFI) Successful Partnership Example: Serving People with Disabilities

The Community and Shelter Assistance Corporation of Oregon

Asset Accumulation Rules

The complexity of rules related to resources and public benefits scares many away from trying to acquire assets.

The Community and Shelter Assistance Corporation (CASA) of Oregon is the administrator and fiduciary organization behind the Valley Individual Development Accounts (VIDA) Program, the largest Individual Development Account (IDA) program collaborative in the State of Oregon. It has forty-two member agencies in more than thirty-one counties spanning both urban and rural areas of the state. VIDA supports people with home purchases, small business development, home repair or rehabilitation, adaptive equipment or technology to obtain or maintain employment, or post-secondary education/workforce training. In the past year Oregon has built on what it accomplished in Phase I of the AFI Serving People with Disabilities Project. Phase I succeeded in bringing together the disability and asset building communities to communicate and partner with each other. In Phase II CASA addressed the critical issue of how to make IDAs work for people with disabilities, identifying approaches and products that provided customized solutions to individuals' needs and ensuring that systems support them in becoming economically self-sufficient. Instead of trying to make people with disabilities fit into their existing services, CASA was committed to improving their services to better support people with disabilities.

CASA is sensitive to the extensive barriers that many individuals with disabilities face in becoming part of the financial mainstream programs. These individuals may lack control over their money. Many have poor or no credit, limited financial leverage, and are frequently victims to predatory lending. The public systems and professional staff working with these individuals often do not understand or expect persons with disabilities to be able to build assets. The complexity of rules related to resources and public benefits scares many away from trying to acquire assets. CASA believed these daunting issues could be addressed by strong partnerships that developed a shared vision rather than one agency or funding source trying to do it alone.

CASA pulled together two strong community partners, who have a wide range of expertise in asset building strategies and supporting individuals with disabilities - Community Vision and Innovative Changes. Community Vision is a nonprofit organization providing individualized housing, supported living, employment and homeownership services to people with disabilities. Innovative Changes is a certified Community Development Financial Institution (CDFI) Loan Fund, founded by Innovative Housing, Inc. to help struggling individuals and families manage short-term financial needs in order to achieve and maintain household stability. They offer financial coaching, small dollar consumer loans, and credit building opportunities.

Collectively the partners were able to create a portfolio of services that meet the needs of individuals with disabilities. They worked together to make IDAs accessible to persons with disabilities resulting in thirteen IDA savers, two home purchasers and one business starter. The partnership developed additional asset building models for people with disabilities as they realized that IDAs were not always the best starting point for the population. CASA provided capital for Innovative Changes to establish Assistive Technology (AT) loans.

Community Vision obtained funding from community fund raising efforts, and Innovative Change obtained a grant from U.S. Department of Treasury's CDFI fund, and decided to use a portion of the grant towards AT loans. The partners are working to integrate financial education into the loan fund. The fund makes up to 15 loans available to individuals with disabilities to purchase adaptive technology that increases their independence.

CASA, Community Vision, and Innovative Change have strived to adapt services and expand partnerships to ensure individuals with disabilities are able to participate in asset building.

Assets for Independence (AFI) Successful Partnership Example: Success Story

Arlene Huggett

Arlene Huggett is a talented artist who has shown in both Portland, Oregon and New York City. She is a woman with a lively personality who spent much of her 73 years living in an institution due to her cerebral palsy. In the institution she had limited ability to paint. Since she has moved to the community she has developed a large portfolio of abstract paintings and been active in the art community. She is committed to having a successful art business. The partnership CASA of Oregon and Community Vision formed created an avenue for Arlene to move forward.



*Arlene, Community
Vision, Inc.*

The CASA of Oregon and Community Vision partnership created IDAs for individuals with disabilities at a five to one match. Arlene was able to save in an IDA while living on her modest income from SSI and SSDI. Community Vision assisted her in researching the art market in Portland, Oregon. CASA provided financial literacy classes where she learned how to insure her future business would be successful. Through her research and what she learned in her financial classes she narrowed her focus to creating and selling greeting cards. She reached her IDA saving goal early in 2011 and is in the process of launching her greeting card business.

Support for People with Disabilities Initiative: Partnership between an AFI Grantee and a Disability Service Provider

Sample Pilot Implementation Plan

Pilot Summary & Goals

- ▶ Provide a summary of the AFI grantee's background and the Disability Service Provider's (DSP) background.
- ▶ Give an overview of the goals the partnership intends to achieve.

Outcome 1:

An example outcome would be: The AFI Grantee and the DSP will provide ongoing cross-trainings with one another. This will prepare AFI Grantee staff for better serving people with disabilities. Additionally, it will help the DSP to better understand the services AFI Grantees can provide.

Action Steps

- ▶ Provide an overview of the steps the AFI grantee and Disability Service Provider (DSP) will take to achieve this outcome. For example:
 - a) The AFI Grantee will invite the DSP representatives to attend financial literacy training offered by the grantee. This will allow the DSP to better understand services provided through AFI and to advise the grantee on steps they could take to make the training more appropriate for persons on disability benefits.
 - b) The DSP will train AFI staff on accessibility and accommodations. They will also provide trainings on disability benefits.
 - c) The AFI grantee and DSP will use materials on www.idaresources.org/disability to become better informed about how persons on disability benefits can participate in AFI IDA programs.
 - d) Timeline: This will be started at the beginning of the project's implementation

Outcome 2:

An example outcome would be: The AFI Grantee and the DSP will partner to modify the existing financial literacy training to insure it meets the needs of individuals with disabilities, particularly those receiving disability benefits.

Action Steps

- ▶ Provide an overview of the steps the AFI grantee and DSP will take to achieve this outcome. For example:

- a) The DSP will analyze the financial literacy training and provide suggestions on how the training can be more accessible and more applicable to persons on disability benefits.
- b) The AFI grantee will ensure the financial literacy trainings are available both in person and online to accommodate individuals.
- c) Timeline: This will be completed prior IDA participants with disabilities beginning financial literacy training.

Outcome 3:

An example outcome would be: Have 8 individuals with disabilities open an AFI individual development account (IDA) for home ownership, small business, or post-secondary education.

Action Steps

Provide an overview of the steps the AFI grantee and the DSP will take to achieve this outcome. For example:

- a) The AFI Grantee will do outreach to clients of the DSP, providing materials and brief consultations with them about how they might benefit from AFI services.
- b) The DSP will provide the AFI Grantee with referrals for clients interested in the AFI program.
- c) Timeline: The AFI Grantee will have the 8 individuals with disabilities enrolled in the AFI IDA program within the first 6 months of the project's implementation.

Asset Building for People with Disabilities

How Can Individuals with Disabilities Benefit from Participating in an AFI IDA Program?

The primary benefit of participating in an AFI IDA program is that IDA funds can be used to save for one of three important goals: Home ownership, post-secondary education or training, or business capitalization (Public Law 105-285, Assets for Independence Act). Below is a summary of AFI program goals and how they might help support individuals with disabilities. This paper also looks at other supportive services that complement AFI accounts.

AFI Asset Goals

The primary benefit of participating in an AFI IDA program is that IDA funds can be used to save for one of three important goals: Home ownership, post-secondary education or training, or business capitalization.

AFI Asset Goals

Home Ownership

- ▶ There are lots of misconceptions about home ownership for people with disabilities. The most common myth is that individuals may not own a home and still be eligible for their Social Security Disability benefits and health insurance such as Medicare or Medicaid. In fact, nothing could be further from the truth!
- ▶ People who get disability benefits under Title II of the Social Security Act (often referred to as Social Security Disability Insurance or SSDI) can own any assets, including a home, with no effect on their cash benefits or health insurance. These programs are not means-tested in any way! SSA regulations also permit Supplemental Security Income (SSI) recipients to own one home of any value as long as the individual lives in it. SSI recipients may receive home equity loans as well as mortgages, which do not count as income either. Home ownership is an excellent investment strategy for Social Security disability beneficiaries that should be actively encouraged!

Post-Secondary Education and Training

- ▶ Multiple sources of funding are potentially available to fund education, training, and career development for individuals with disabilities. The most common sources of assistance include State Vocational Rehabilitation Agencies (SVRAs) and the One-Stop Career Center system funded by the US Department of Labor through state and local Workforce Investment Boards. While these two funding sources are valuable, they certainly do NOT cover all of the expenses an individual might incur in a post-secondary educational or training program, and not all individuals with disabilities will meet the stringent eligibility criteria these agencies impose. AFI IDAs offer an important way for individuals with disabilities to set aside their own earned income to offset the costs of obtaining education and training beyond high school.
- ▶ With regard to post-secondary education or training in the AFI IDA program, federal law requires that IDA funds be used only to pay tuition and expenses associated with attending an accredited educational institution. The institution must either be a college/university or a vocational school as defined by the Higher Education Act or by the Carl D. Perkins Vocational and Applied Technology Education Act. The types of

expenses that can be paid with IDA funds include course fees, books and supplies, special equipment, including a computer and software, and tuition and fees associated with enrollment or attendance at the school.

Business Capitalization

- ▶ Self-employment and small business ownership are increasingly seen as viable options for individuals with disabilities. Self-employment can often accommodate a person's disability more readily than wage employment since it offers flexibility, independence, and freedom from common disability barriers encountered in wage employment. Finally, a well-run small business can provide a much greater financial return than wage employment while also creating equity for the owner. Two of the more common sources of financial assistance in starting a small business for persons with disabilities would include State Vocational Rehabilitation Agencies and the Social Security disability benefit work incentive known as a Plan for Achieving Self-Support or PASS.
- ▶ AFI IDAs provide an additional method for funding small business ownership in which the individual saves his/her own earned income to achieve this goal. The micro enterprise or small business goal for AFI IDAs requires that the business be legally established and not in violation of any law or public policy. It is also a requirement that the owner have a business plan that has been reviewed and approved by a financial institution, micro enterprise development organization, or nonprofit loan fund. AFI grantees will in most instances have relationships with community partners who are able to provide technical support to IDA participants on business plan development and review. The types of expenses that IDA funds can be used for under the business plan include capital, plant, equipment, working capital, inventory, and licenses.

Services and Supports Provided to AFI IDA Participants

- ▶ AFI IDAs are more than a vehicle for saving money. Once participants are enrolled, they work with the IDA grantee to develop an Individualized Savings Plan (ISP). These ISPs are required for AFI program participants and serve as a kind of contract between the individual and the program, spelling out expectations of both parties. The savings plans typically detail the asset to be purchased, the amount to be saved by the individual and the schedule of deposits, the match rate that will be provided by the AFI IDA project, the financial education classes and asset-specific training that the individual agrees to participate in, and information on other counseling or supportive services that will be provided.
- ▶ Once the savings plan has been established, the AFI grantee will assist the individual with opening their IDA and provide them with assistance as needed throughout the period of time that they are saving. This includes assuring that the participant is saving as planned by monitoring his or her IDA deposits and being available to problem solve when issues arise. AFI IDA participants can also expect that the AFI grantee will allocate matching funds as they make their regular earnings contributions, and also provide or arrange for the financial education and asset-specific training needed for the participant to be successful. Finally, once the savings goal has been met and all training and other requirements completed, the AFI grantee will assist with the actual asset purchase.

Financial Education

- ▶ AFI IDA programs put a great deal of emphasis on helping participants develop "financial literacy" for financial education. Financial education refers to having an understanding of the basic financial issues that are an important part of adult life. In the long term it is not helpful to accumulate earnings and resources only to lose them due to poor money management skills. This is where a structured program of financial literacy comes in.
- ▶ AFI IDA programs address these needs by providing basic financial education training and very often, an array of other supportive services. Examples of training and supportive services include:
 - ❑ Financial education on owning and managing a bank account or a credit card;
 - ❑ Credit counseling and repair;
 - ❑ Guidance in accessing refundable tax credits, including the Earned Income Tax Credit and the Child Tax Credit; and
 - ❑ Specialized training in owning and maintaining particular assets for the long term.

Examples of specific asset training includes such things as credit counseling for home ownership, career counseling for education, and business support and training for starting a business. Together, all of the education and support services provided help participants develop skills and improve their financial management habits for the long term.

- ▶ Each participant in an AFI program must take the required financial literacy training, which is provided free of charge. Asset-specific training requirements vary by AFI grantee.

What AFI Grantees Need to Know about IDA Participation and Disability Benefits

Social Security Benefits

All of these programs are designed to supplement the income of workers and their families when the worker loses earnings due to retirement, disability, or death.

How Will Participating in an IDA Affect a Person's Eligibility for Disability Benefits?

Two of the largest Federal programs that pay monthly cash benefits to qualified individuals with disabilities are the Title II Disability benefit program (also commonly referred to as Social Security Disability or SSDI) and the Supplemental Security Income program (SSI). In addition to income support, these programs also provide beneficiaries with access to health insurance and a variety of incentives to encourage and support work. While the Title II and SSI programs share a common disability requirement and process for determining disability, they are very different programs in regards to their purpose, non-disability eligibility requirements, and their treatment of work, earnings, and resources. Based on these important programmatic differences, answering the question, "How will participating in an IDA affect a person's eligibility for disability benefits and monthly benefit amounts?" requires first understanding which of the Social Security benefits a participant receives.

Introduction to Title II Disability Benefits

The Social Security Act, which became a law in 1937, was originally designed to serve solely as a retirement program for workers. Over the years, however, a number of benefit programs have been added under Title II of the Social Security Act. These include benefits paid to a worker's family members and survivors, as well as a disability program for workers.

All of these programs are designed to supplement the income of workers and their families when the worker loses earnings due to retirement, disability, or death. It is important to keep in mind that the Social Security benefits are an insurance program, meaning that a person is entitled to receive them if they have worked or are a dependent of someone who has worked and paid sufficient Social Security taxes through their employment to have "insured status." Individuals determined eligible for a Title II disability benefit receive a monthly cash benefit. Additionally, beneficiaries can receive Medicare after a 24-month waiting period.

There are several different types of Title II Disability benefits, including SSDI, Childhood Disability Benefits (CDB), and Disabled Widow(er)s benefits.

- ▶ **Social Security Disability Insurance (SSDI):** Social Security Disability Insurance is paid to people who worked and paid Social Security tax, and then became unable to work at a certain level because of the disability. Only Individuals with disabilities who have worked and have insured status are eligible for SSDI. There is no minimum age at which a person can begin receiving SSDI benefits. In fact, establishing eligibility for SSDI can happen quickly for younger persons since fewer "work credits" are needed for insured status for those who become disabled before the age of 24.
- ▶ **Childhood Disability Benefits (CDB):** Childhood Disability Benefits are paid to people who are over age 18, developed a disability before age 22, and who have a parent who worked and either receives a Social Security benefit based on his or her work, or who

has died. Like Social Security Disability Insurance (SSDI), this benefit is considered a disability benefit.

- ▶ **Disabled Widow(er)s Benefits:** The third disability program paid by Title II of the Social Security Act is paid to widows or widowers of workers who have died. The beneficiary must be over age 50, must have a disability, and must meet some additional requirements such as marriage to the worker.

Because the Title II disability benefits are not based on economic need, unearned income and resources are not considered and have no bearing on eligibility or payment amount.

Introduction to Supplemental Security Income

The second disability benefit program administered by the Social Security Administration (SSA) is SSI. SSI is authorized by Title XVI of the Social Security Act and is a means-tested income support program. Unlike the Title II Disability benefits, there is no requirement that a person has worked or is a dependent of someone who has worked. Instead, eligibility for SSI is based on meeting SSA's requirement for being aged, disabled, or blind and having limited income and resources. A person can be eligible for SSI from birth if these requirements are met.

The SSI program is a social assistance program of last resort and, as its name suggests, is meant to supplement any other income a person may already have to help him or her meet basic needs for food and shelter. The SSI program provides monthly cash benefits up to a maximum benefit level known as the Federal Benefit Rate (FBR). The 2012 Federal Benefit Rate is \$698 for an individual and \$1,048 for a couple who both receive SSI. The actual benefit amount in a given month depends on a number of factors, including earned income and unearned income. Because SSI supplements these other types of income, the more a person has in earnings and unearned income, the less they receive in SSI. As a result, income support provided by SSI may vary from month to month as an individual's or couple's financial situation fluctuates.

In addition to income supports, SSI also provides access to health insurance under Medicaid. In most states, eligibility for Medicaid is automatic for people who are eligible for SSI.

Impact of IDA Participation on Title II Disability Benefits

Many Social Security Disability beneficiaries can and do work, and have the earned income needed to contribute to an IDA. Additionally, there are many work incentives in both the Title II Disability and SSI programs that both encourage and support work. These work incentives enable beneficiaries to access the services they need to be successful, while at the same time gradually reducing their reliance on benefits supports as earnings increase.

Question: *Is participating in an AFI IDA a good idea for a person with a disability who is trying to establish eligibility for a Title II Disability Benefit?*

Yes. Title II Disability benefits is an insurance program that an individual is entitled to, based on past work in Social Security covered employment. A person may establish eligibility for

benefits based on their own work record and insured status (SSDI benefits), or on the work record of a family member who has insured status and is either disabled, retired, or deceased (Childhood Disability Benefit, Disabled Widow(er)s Benefit).

While there is a perception in the disability community that Title II Disability benefits are a means-tested program (that is, they have income and resource limitations) the reality is that accumulating resources and building wealth have never been a problem for Title II beneficiaries. Eligibility for Title II disability insurance benefits is not based on economic need and there has never been any restriction on savings, investment, or asset accumulation. As a result, participation in an IDA will not adversely affect an individual's application or eligibility for Title II Disability benefits.

Question: *For Title II beneficiaries, will earning contributions to an IDA, matching funds, or interest earned to an IDA have any impact on the cash benefit amount?*

No. Title II beneficiaries are not penalized in any way for having cash savings, IDAs, pension funds, retirement accounts, real property, or other investments to rely upon in addition to the Social Security disability payment and Medicare coverage. As resources are not a consideration in the Title II disability program, beneficiaries will not experience any change in eligibility or benefit amount as a result of funds accumulated in their IDA.



Thomas, CASA of Oregon

However, while participation in an IDA does not impact a person's Title II disability benefits, there are a number of factors that do. As noted above, the benefit amount is a function of the individual's work history. The following are also important features of the program to keep in mind when working with beneficiaries:

Earnings from a job or self-employment may affect the ability of a Title II Disability beneficiary to continue receiving cash benefits over time. After a beneficiary has worked for a period of time, SSA will evaluate whether or not they should continue receiving their benefit. One of the measures they use in making this decision is called Substantial Gainful Activity, or SGA. SSA reviews a person's gross earnings over a period of time, applies certain deductions, and then decides if the remaining amount of countable earnings represents substantial work. For individuals who are not blind, the SGA guideline in 2012 is \$1,010 a month. For individuals who are blind, SGA in 2012 is \$1,690 a month. A decision by SSA that a beneficiary's work is substantial will result in a loss of their cash benefit. There is no provision in the Title II disability program for a gradual reduction in cash benefit as earnings increase. A Title II beneficiary will either receive their full cash benefit in a given month or no income support at all.

Question: *Based on the fact that earnings may ultimately result in the loss of a Title II benefit, what is the likelihood that a beneficiary will be willing to work and have the earnings needed to participate in an IDA?*

While it is true that work valued at a substantial level will ultimately result in the loss of Title II disability benefits, there are a number of work incentives in the program that make it possible for beneficiaries to work and receive their benefit at the same time. Earned income and Title II benefits do not have to be mutually exclusive. It is possible for beneficiaries to work and NEVER lose cash benefits or Medicare coverage—it is simply a matter of how much the person is able to work and for how long.

The Title II work incentives may best be described as occurring in phases. In each phase, there are protections that allow for all or some of the monthly cash payments to be retained while beneficiaries test their ability to work. The phases occur in a chronological sequence. With each successive phase, fewer protections exist in order to help the beneficiary prepare for the possible eventual loss of cash benefits. The following is a quick overview of the phases:

Phase 1: Trial Work Period or TWP. This phase is not activated unless the beneficiary earns gross wages in excess of the TWP limit (\$720 per month in 2012). If a beneficiary earned less than that amount, this work incentive phase would never even begin - the earnings would essentially be irrelevant. The wonderful thing about the Trial Work Period is that beneficiaries are guaranteed to receive full cash benefits no matter how much is earned. This phase is limited to 9 months within a rolling 5 year period.

Phase 2: Extended Period of Eligibility or EPE. When the TWP ends, the next phase of work incentives begins - the extended period of eligibility. This is a 36 consecutive month period in which full benefits may be received as long as substantial gainful activity (SGA) is not achieved. Again, SGA is a guideline SSA uses to determine when a beneficiary has demonstrated the ability to work at a “substantial level.” For 2012, this guideline is set at \$1,010 per month for people who are not blind, and \$1,690 for blind individuals. There are many other factors SSA considers in addition to gross wages. During the EPE, benefits may be received for any month in which earnings fall below the SGA guideline, or for months in which the beneficiary doesn’t work.

Phase 3: Grace Period. Even after a beneficiary has demonstrated SGA level work, SSA still permits payments to be made for three additional months - this is the third phase of work incentives and it is called the “grace period.” The first month in which SGA-level work occurs after the Trial Work Period has ended is referred to as the “cessation month.” SSA allows a payment to be made in this month and the two succeeding months for a total of three grace period months.

Phase 4: Extended Medicare. After cash benefits have stopped, SSA still allows for the continuation of Medicare benefits through a provision known as the extended period of Medicare coverage (EPMC). The EPMC allows beneficiaries to retain premium free Part A

and premium based Part B for a minimum of 93 months after the end of the TWP. Even after the EPMC has ended, individuals have the option of “buying into” the Medicare program by paying the Part A and Part B premiums.

While it is certainly true that there are disincentives to work that remain in the Title II Disability program, it is important to recognize that many DI beneficiaries can and do work. Additionally, Title II disability benefits have no direct prohibition on participating in any type of IDA program, or any other savings or investment program.

Given their work and earnings potential, as well as the DI program’s friendliness to assets, Title II beneficiaries are excellent candidates for an IDA!

Question: *In addition to the provisions described above, are there other opportunities for Title II beneficiaries to strategically use work incentives to support IDA participation?*

Yes. There are additional incentives in the Title II Disability program that support beneficiaries’ efforts to work and earn money, thus making it possible for them to participate in an IDA. They include the following:

Impairment Related Work Expense: An Impairment Related Work Expense, or IRWE, is a work incentive that is available to both Title II and SSI beneficiaries. IRWEs are services or items that are needed by a beneficiary to work, and are incurred by that person as a result of their disability. Examples of IRWEs include supported employment services, special transportation, medical support devices, and assistive technology aids. The purpose of the IRWE incentive is to enable beneficiaries to recover the cost of such expenses through their disability benefit. Once approved by the SSA, the dollar amount of the IRWE is deducted from the beneficiary’s gross earnings in the process of determining whether earnings are substantial. By reducing the amount of earnings considered, an IRWE may make it possible for a beneficiary to continue to get their Title II disability benefit when it otherwise would stop. (For additional information, see the IRWE fact sheet.)

Plan for Achieving Self-Support (PASS): While the Plan for Achieving Self-Support is identified as an SSI work incentive, beneficiaries receiving Title II Disability benefits are excellent candidates for this provision as well. PASS is an incentive that allows a person to set aside income and/or resources to use to achieve a specific work goal. When the SSA determines eligibility for SSI, it does not count income or resources that the beneficiary uses to purchase goods or services that will make it possible for them to reach their goal. The PASS makes it financially feasible for a beneficiary to pay for these items or services by enabling them to recover some, or in some instances, all of the expense through an increase in SSI cash payment.

Impact of AFI IDA Participation on Supplemental Security Income (SSI) Benefits

SSI is an economic needs-based income support program provided to eligible individuals with disabilities who have little income and few resources. SSI cash payments are intended to supplement any other income an individual may already have in order to meet minimum

needs for food and shelter. Because the SSI program is means-tested, the Social Security Administration considers how much a person has in both income and resources when determining both initial and on-going eligibility for benefits.

The eligibility determination process is complex (for more information see the accompanying fact sheet). The basic concepts that AFI grantees need to understand are the limits on income and resources. *Income* is defined as any item an individual receives in cash or in-kind that can be used to meet his or her need for food or shelter. Income is counted for SSI purposes in the actual calendar month it is received. *Resources* are defined as cash and any other personal property, including any real property, that an individual (or spouse, if any) owns; has the right, authority, or power to convert to cash; and is not legally restricted from using for his/her support and maintenance.

To become and remain eligible for SSI, countable income and resources cannot exceed a specific threshold. Countable income must not exceed the FBR. In 2012, this is \$698 for an individual and \$1,048 for an eligible couple (two SSI beneficiaries who live together and are married to each other or presenting themselves to the community as married). Countable resources cannot exceed \$2,000 for an individual or \$3,000 for an eligible couple. *[Please see the tool, Supplemental Security Income (SSI) Benefit Determination, for information on how income and resources are counted for eligibility determination.]*

Question: *Will participation in an AFI IDA affect resources and income?*

No. While asset accumulation is severely limited in the SSI program, funds set aside in an AFI IDA do not count toward the SSI resources limit, matching deposits do not count as income, and the account owner's deposits can actually cause the SSI benefit amount to go up. *Since January 1, 2001, when SSA expanded its exemptions for funds held in AFI IDAs, there is NO negative impact on an individual's SSI benefit for participating in this program.*

Question: *How are AFI IDAs treated in the Income Test for SSI Eligibility?*

The SSI program rules provide for the following:

- ▶ Earnings that an individual contributes to an AFI IDA are deducted from wages in determining countable income for SSI eligibility.
- ▶ Earnings contributions made to an AFI IDA are also deducted when determining the amount of SSI cash benefit due the individual. The dollar amount of earnings contributed to the IDA each month is subtracted from the beneficiary's gross monthly wages (or from net earnings from self-employment), thereby reducing their countable earnings and increasing the amount of SSI they receive.
- ▶ Any matching funds that are deposited in an AFI IDA are excluded from income.

- ▶ Any interest earned on the individual's own contributions and on the matching funds that are deposited in an AFI IDA is excluded from income.
- ▶ Disbursements from an AFI IDA used for a qualified purpose (e.g., education, business capitalization, or home purchase) are excluded from income.
- ▶ Emergency withdrawals made by a beneficiary from an AFI or TANF IDA are considered to be loans and are therefore not counted as income for SSI purposes.

Question: *How are AFI IDAs treated in the Resource Test for SSI Eligibility?*

The AFI 2000 Amendments include a requirement that all federal means-tested programs disregard any assets that accumulate in an AFI IDA when determining eligibility or benefit levels. To this end, SSA established SSI program rules that provide for the following disregards:

- ▶ An individual's contributions that are deposited in an AFI IDA are excluded from resources in determining both initial and ongoing eligibility for SSI.
- ▶ Any matching funds that are deposited in an AFI IDA are excluded from resources.
- ▶ Any interest earned on the individual's own contributions and on the matching funds that are deposited in an AFI IDA is excluded from resources.
- ▶ The savings goals that AFI IDAs fund are also excluded as resources in the SSI program.

It has always been the case that the SSI program allows applicants and beneficiaries to own a home. In fact, the primary residence of an SSI beneficiary is completely excluded from consideration as a resource no matter what it is worth. It is important to note the phrase "primary residence." This means that the applicant must live in the home for it to be excluded. The parcel of land on which a home is located is also excluded, regardless of its size or value. Homeownership is and always has been an excellent way for SSI recipients to build wealth; participating in an AFI IDA makes this goal all the more attainable.

SSI also permits ownership of certain businesses through a specific resource exclusion known as "*property essential for self-support*" (PESS).

Finally, the SSI program offers a variety of income and resource exclusions specifically designed to encourage saving for post-secondary education. SSI program rules provide that any portion of a grant, scholarship, fellowship, or gift used or intended to be used to pay the cost of tuition, fees, or other necessary educational expenses at any educational institution, including vocational and technical education, is excluded from resources for 9 months beginning the month after the month it was received. Such funds are not income when received and are excluded from resources for the following 9 months. Additionally, the SSI program provides for an exclusion of income or resources set aside in an approved PASS.

Question: *How do Work and Earnings Affect the SSI Payment Amount?*

Once eligible for SSI, the amount of the SSI payment individuals receive monthly depends primarily on their total countable income. SSA uses a standard mathematical formula to determine countable income. In this formula there are numerous deductions and work incentives that are considered. As a result of these income exclusions, a beneficiary's SSI payment is not reduced dollar for dollar. As an individual's earnings increase, their SSI payment gradually decreases. Beneficiaries will continue receiving cash payments until their total countable income increases to the point where their SSI payment is reduced to zero. In 2012, an SSI beneficiary who has no other income can earn up to \$1,481 a month before losing their cash benefit.

Given the work friendly nature of the SSI program, SSI beneficiaries are well positioned to work, earn, and save in an IDA. This is particularly true of young people who receive SSI and qualify for an additional income exclusion known as the Student Earned Income Exclusion (SEIE). The SEIE allows young SSI beneficiaries (who are under age 22 and regularly attending school) to exclude a specific amount of gross earned income each month up to a maximum annual exclusion. The SEIE decreases the amount of countable earned income, thus permitting the youth to keep more of their SSI check when they work. In many cases, the SEIE allows students to test their ability to work without experiencing any reduction in the SSI check at all! With their full SSI cash benefit and earnings each month, these young beneficiaries can benefit greatly from both the savings and financial education components of an IDA.



Martha, AAA Fair Credit Foundation

Question: *Will participating in an IDA have any effect on the SSI payment amount?*

Yes, IDA participation will affect a person's SSI cash benefit – but in a positive way. Not only will an individual's contribution of earnings to an IDA will be deducted during the income test for eligibility, but once eligible, the deduction is also applied in the formula for determining SSI payment amount. This means that participating in a federally funded IDA program can actually allow a beneficiary to keep MORE of their SSI cash payment.

The SSI program rules allow for excluding AFI IDA contributions directly from the countable earnings. The deduction translates to lower total countable income, which in turn means that the beneficiary is due an increase in his or her cash payment. For all SSI beneficiaries, excluding AFI and TANF IDA contributions directly from countable earnings results in an individual recovering half of their contribution through their SSI cash benefit. This increase in monthly SSI payment makes it more feasible for beneficiaries save in their IDA while continuing to meet monthly living expenses.

Question: What happens if an IDA ends and there are unused earnings contributions that are returned to the SSI beneficiary?

If there is unused savings when the IDA is closed, the participant's savings will be counted as income in the month that it is received. Any amount remaining at the beginning of the second month will count as a resource. There are, however, options available to prevent these funds from being counted as income and resources, and adversely affecting SSI eligibility and payment amount. For example, beneficiaries may consider setting the funds aside in a Plan for Achieving Self-Support, or using the funds for other items or services not considered as countable income or resources for the SSI program.

Question: What opportunities are available for SSI beneficiaries to use work incentives strategically to support IDA participation?

The SSI program includes a number of work incentive provisions that enable beneficiaries who are blind or disabled to work and retain benefits or to increase their levels of work activity without the loss of SSI disability status or Medicaid. These incentives provide higher amounts of income or resource exclusions as recognition of the expenses associated with working.

Impairment Related Work Expenses (IRWE) and Blind Work Expenses (BWE) support the efforts of SSI beneficiaries to work. These provisions make it possible for beneficiaries to recover money used to pay for work expenses through their SSI payment. There are requirements that must be met for an expense to be approved as an IRWE or BWE. IRWEs must be an expense that is directly related to a disabling condition and necessary for the person to work. The BWE provision is more inclusive, in that it is not necessary for the expense to be related to the person's blindness. Any ordinary expense that can be reasonably attributed to the person's work can be approved as a BWE. While these provisions do not provide for the exclusion of resources, they do increase likelihood that beneficiaries can access and pay for the supports they need to work, resulting in earned income to contribute to an IDA.

The PASS work incentive is most similar to and complementary of IDAs in terms of providing an opportunity for beneficiaries to save for and acquire assets. PASS permits individuals to deduct countable income, or exclude resources that would otherwise reduce or eliminate the SSI payment. PASS is an agreement between SSA and the beneficiary. The beneficiary agrees to take outlined incremental steps to achieve a specified vocational goal. The plan allows the beneficiary to use "countable income" or resources to pay for goods or services needed in order to reach the goal. In turn, the SSA replaces the PASS expenditures by increasing the individual's SSI benefit payment. This program offers tremendous flexibility. Beneficiaries have used it to start small businesses, to pay for training, to purchase necessary equipment and to provide short-term job coaching services, in addition to other goods or services too numerous to name here. Unlike an IDA, however, a PASS cannot be used to support homeownership.

When someone writes a PASS that is approved by the SSA, the countable income or resources are excluded from affecting SSI payment amount and benefit eligibility. For example, if someone who has \$300 in countable income commits all of the monthly income to PASS expenses, the SSA will disregard the \$300 when it determines SSI eligibility and payment amount. In this case, SSI benefits would replace all \$300. The replacement is dollar for dollar, limited to the amount of the FBR. Beneficiaries do not have additional income to meet living expenses, but they do have additional money to use to pay for goods or services necessary to achieve the vocational goal.

Another SSI provision that results in the exclusion of resources is Property Essential to Self-Support (PESS). This incentive permits beneficiaries to have resources that are used as part of certain businesses or are necessary for self-support. PESS is particularly important for IDA participants with a goal of self-employment. Specifically, under this rule, SSA excludes certain resources or property that an individual or eligible couple needs for self-support, including property used in a trade or business, non-business income-producing property, and property used to produce goods or services essential to an individual's daily activities. There are different rules for considering property essential to self-support depending on whether it is income producing or not. Resources excluded under this provision generally fall into three categories as described below:

1. *Business Property, or Property of an Employee.* All property used in the operation of a trade or business is excluded as property essential to self-support. For self-employed individuals, this includes inventory, the building where the business is housed, and cash used in operating the business, regardless of their value. The property must be in current use as defined by SSA. Personal property used by an employee for work such as tools, safety equipment, or uniforms is also excluded.
2. *Non-Business Property Used to Produce Goods or Services Essential to Daily Activities.* Up to \$6,000 of the equity value of non-business property used to produce goods or services essential to daily activities is also excluded from resources. An example might be a plot of land that the family uses to produce vegetables for their own use.
3. *Non-Business, Income-Producing Property.* Up to \$6,000 of the equity value of non-business income producing property can be excluded from resources if a net annual income of at least 6% of the excluded equity is produced. An example of this type of property is rental property.

The rules governing PESS can be complicated and many times the local SSA office will have little experience dealing with these provisions. Assistance on claiming PESS, particularly for SSI beneficiaries who plan to be self-employed or who already own businesses, and are considering an IDA, can be obtained by contacting the local Work Incentives Planning and Assistance (WIPA) provider. To find the WIPA provider in your area, go to:

<http://www.socialsecurity.gov/work/ServiceProviders/WIPADirectory.html>

If the equity is greater than \$6000, SSA will count only the amount over \$6000 toward the allowable resource limit.

What AFI Grantees Need to Know about Disability & Work

Many people with disabilities are employed.

Employment Opportunities

As societal and employer attitudes about people with disabilities and their abilities and rights have changed people with disabilities have seen their opportunities to work and participate fully in jobs, employment and community grow.

Social Security disability benefits were initiated in the mid-1950s to provide income for people who were considered incapable of working. At the time, the prevailing “medical model” of disability viewed disability as a permanent condition inherent in the person that prevented them from being integrated into communities and the workforce (Shriver Center, 2009).

As societal and employer attitudes about people with disabilities and their abilities and rights have changed people with disabilities have seen their opportunities to work and participate fully in jobs, employment and community grow. Advancements in assistive technology have also expanded opportunities within the workforce for people with disabilities. The 1990 Americans with Disabilities Act (ADA) suggests that the problem may be lack of accommodations to make a program or workplace work for someone with an impairment.

The modern framework for understanding disability is embodied in the international consensus for understanding disability developed by the World Health Organization in 2001. This framework looks at disability as an impairment, activity limitation, or participation restriction that is the product of the interaction between a person’s physical condition and the society in which they live, not simply a characteristic inherent in a person (Fremstad, 2009). While impairment, activity limitations, and participation restrictions overlap, any one of these can exist without the other. The ability to work often depends on the workplace environment.

The modern framework views disability as an impairment, activity limitation, or participation restriction that is the product of the interaction between health conditions and environmental and personal factors. State-of-the-art vocational rehabilitation programs have discarded the notion that large groups of people are unemployable due to disabling conditions (Shriver Center, 2009). Vocational rehabilitation has evolved to take the approach that all persons are capable of working if they are provided with appropriate services and supports, such as supported employment, assistive technology, and personal assistance services.

Supplemental Security Income (SSI) and Social Security Disability Insurance (SSDI) include a number of incentives to support beneficiaries to work.

A common misperception is that SSDI and SSI beneficiaries will lose their eligibility for benefits if they work and therefore do not have the earnings needed to participate in an IDA. In reality, the Social Security Administration has initiated a number of work incentives

with both the SSI and Title II disability programs that provide incentives for people receiving these benefits to work (AFI Resource Center, “Top Ten Things AFI Grantees Should Know”). These include the Ticket to Work program, Work Incentives Planning and Assistance (WIPA), provisions that permit beneficiaries to retain their Medicaid or Medicare health insurance coverage after cash payments end due to earned income, and other work incentives.

Many Social Security disability beneficiaries are employed or are likely to become employed in the future, making them excellent candidates for IDAs.

Although unemployment rates are high, resources exist to help people find work.

Although societal attitudes are changing, the employment rate for people with disabilities is still far lower than that for people without disabilities, due in part to continued discrimination and disincentives for work in public programs. The government has only recently started tracking unemployment statistics by whether or not the person has a disability (Shriver Center, 2009).

Customized employment is helping many people obtain employment by matching employers’ unmet needs to the person’s contributions in this tough economy. Customized employment individualizes the employment relationship in ways that meet the needs of both employees and employers, based on a determination of the strengths, needs, and interests of the individual with a disability and the specific needs of the employer. Examples of customized employment include:

- ▶ task reassignment, in which the job tasks of current workers are reassigned to a new employee; typically a new job is created and the job description is negotiated based on current unmet workplace needs;
- ▶ job carving, in which an existing job description is modified to contain one or more, but not all, of the tasks from the original job description, and
- ▶ job sharing, in which two or more people share the tasks and responsibilities of a job based on each other’s strengths.

Self-employment in which an individual receives assistance to start their own business is another form of customized employment. In addition many states are using funds from the American Recovery and Reinvestment Act (ARRA) and other federally-funded education and training programs to help people prepare for jobs in high demand fields.

How Can AFI Programs Ensure Equal Access For People with Hidden Disabilities?

AFI grantees may need to offer accommodations or make modifications to ensure that people with disabilities have equal opportunity to benefit from an IDA program (NCWD, 2004). Ensuring that services are accessible for people with disabilities can improve an IDA program for all participants (World Institute on Disability, 2002).

Most accommodations can be made easily and at little or no cost. The key is awareness of accessibility issues and a willingness to be flexible to make services accessible and welcoming to people with diverse abilities and needs, including:

- ▶ physical or structural access to the facility,
- ▶ programmatic accessibility (application, intake process, service delivery), and
- ▶ accessing existing supports in the community when needed for accommodation.

In some cases, local Independent Living Centers and other groups serving people with disabilities can provide needed advice and resources, as well as supports to which to refer clients for services. Many participants with disabilities will already be involved with agencies that provide disability services and supports. AFI grantees could work in partnership with these agencies. In some cases it can be helpful to refer a participant who has symptoms of an undiagnosed hidden disability for a disability-related assessment or evaluation.

Accommodations can be especially challenging for AFI grantees serving individuals who are deaf or hard of hearing. It is important to ask the individual what type of interpreter he or she would like. Although most interpreting needs are met by sign language interpreters, interpreters are also available to meet the needs of deaf-blind people and deaf people who use lip-reading or cued speech. AFI grantees can contact the state Office of Deaf and Hard of Hearing, the state Vocational Rehabilitation agency, or local independent living center for information on how to hire an interpreter in their area. Interpreters can be expensive and is the responsibility of the grantee, so AFI grantees will need to plan for this cost.

Ensuring that Literacy Training Programs Meet the Needs of People with Disabilities

Many people with disabilities might not be ready for an IDA today. But they are ready for fiscal literacy training that addresses their issues. Benefits literacy is a key component to supporting successful IDA outcomes for beneficiaries. Benefits literacy is focused on helping participants understand how their benefits work, and how they are better off by working and how work incentives can enhance IDA participation. Providing this fiscal literacy training that incorporates benefits literacy in these situations builds a base of individuals who have potential to become future savers.

To support participation in financial literacy programs, it may be necessary to adapt classroom-based training programs and materials to suit individuals with intellectual or communication impairments. Online training can be convenient to participants in distant locations or who have difficulty traveling to a training site. Local disability providers can help with making literacy training accessible, as well as provide a source of participant referrals. AFI grantees should seek opportunities to connect with local disability organizations that can help with outreach and providing resources for participants.

Potential Referral Sources & Resources

Below is a listing of potential referral sources and resources to support people with disabilities seeking employment, including links to where AFI grantees can locate resources in their state or local area.

Vocational Rehabilitation Agency—a list of state vocational rehab agencies is available at <http://www.jan.wvu.edu/entre/>. (See also AFI Resource Center, “State Vocational Rehabilitation Agencies,” <http://idaresources.org/files/State%20Vocational%20Rehab%20Agencies.pdf>)

Developmental Disability Council—a list of state councils is available on the National Association of Councils on Developmental Disabilities website, <http://www.nacdd.org/pages/councils.htm>

The Arc—Advocates for the rights and full participation of children and adults with intellectual and developmental disabilities. Local chapters can be found at <http://www.thearc.org>

The Medicaid Infrastructure Grant (MIG) Program—Authorized by Section 203 of the Ticket to Work and Work Incentives Improvement Act of 1999, the MIG program provides funding to enhance State Medicaid programs and services, promote linkages between Medicaid and other employment-related service agencies, and develop a comprehensive system of employment supports for people with disabilities. Contact information for MIG grantees is available at http://www.cms.hhs.gov/TWIIA/03_MIG.asp#TopOfPage

Disability Navigators—Jointly funded by the Department of Labor, Employment and Training Administration and SSA, the Disability Program Navigator (DPN) Initiative operates in 42 states, the District of Columbia, Puerto Rico, Guam, and the United States Virgin Islands. Disability Navigators are employed by One-Stop Career Centers to provide information to help people with disabilities navigate the system of work support programs available at DOL’s One-Stop Career Centers. The Initiative focuses on developing partnerships to improve access to services, create systemic change, and expand the workforce development system’s capacity to serve customers with disabilities and employers. One-Stop Career Centers can be found at DOL’s America’s Service Locator website at <http://www.servicelocator.org/>

Community Work Incentive Coordinators (CWICs)—Each Work Incentives Planning and Assistance (WIPA) project employs CWICs to assist Social Security beneficiaries with disabilities in their employment efforts. CWICs provide outreach to beneficiaries with disabilities and work incentives planning and assistance. They can provide important assistance to AFI grantees in getting the word out about IDA programs and how they can benefit people with disabilities. A directory of WIPA service providers is available at <https://secure.ssa.gov/apps10/oesp/providers.nsf/bystate>

State Assistive Technology (AT) Program—State AT Programs, established under the Technology-Related Assistance Act of 1988 (Tech Act) P.L. 100-407, are funded in all states and US territories. AT programs provide information, training, outreach, individual assistance & public awareness about assistive technology. They also provide technical assistance to service providers, state agencies, and policymakers to ensure effective AT policy and practice. Since a listing of State AT Programs is available at http://www.ataporg.org/atap/index?id=states_listing.

Protection & Advocacy—Included in the Social Security Administration’s Ticket to Work program is a network of Protection & Advocacy for Beneficiaries of Social Security (PABSS)

projects in all 50 states and U.S. territories. This network of projects represents the nation's largest provider of legal advocacy services for individuals with disabilities. The program provides legal assistance on disability-related employment issues. A list of state protection and advocacy organizations for people with disabilities is available at <https://secure.ssa.gov/apps10/oesp/providers.nsf/bystate>.

State Disability Commissions, Committees or Councils—The DOL Office of Disability Employment Policy website provides contact information for State Liaisons in each state, who are typically the directors of the state Disability Commissions, Committees, or Councils. These organizations can often provide information on a multitude of resources available to people with disabilities. <http://www.dol.gov/odep/state/state.htm>

Brain Injury Association—The Brain Injury Association of America's website provides contact information for chartered state affiliates or other local resource options in each state. These resources provide information, education, and support for people affected by traumatic brain injury and their families. <http://www.biausa.org/stateoffices.htm>

National Alliance on Mental Illness—provides support, education, advocacy, and research for people with mental illness and their families. You can find your state and local NAMI chapter at <http://www.nami.org/>

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Creating an Inclusive Environment for Financial Education

An Inclusive Environment

Individuals with disabilities who are low income earners and eligible for participation in an Assets for Independence (AFI) program may need additional support or accommodations to be able to effectively and meaningfully participate in financial education classes.

Individuals with disabilities who are low income earners and eligible for participation in an Assets for Independence (AFI) program *may* need additional support or accommodations to be able to effectively and meaningfully participate in financial education classes. The following checklist will help your organization remove barriers to participation by individuals with disabilities and create an inclusive environment. Creating an inclusive environment starts with the actions and attitudes of staff members who set high expectations about a barrier free environment that encourages everyone to be sensitive and solution oriented to individual differences.

This checklist is one step towards creating an inclusive environment.

How to use this checklist: We suggest saving this checklist to your desktop to make optimal use of the tools and resources hyperlinked throughout. As you move through the checklist, click on hyperlinks to link to more information and suggestions or contact the ADA National Network (listed under resources) to better understand your legal obligations. Please keep in mind that not ALL individuals with disabilities will need assistance, accommodations or other supports.

Creating an Inclusive Environment Self-Evaluation Checklist		
Indicators		<input checked="" type="checkbox"/> Check if here if this is True
<i>Environment:</i> Spirit of Inclusion	1. Are participants with disabilities treated as full participants in the classroom?	
	2. Are the expectations for participants with disabilities the same as for other participants?	
	3. Are staff using “ people first language ” and focusing attention on abilities, interests, and aspirations in the same way as for other participants?	
<i>Environment:</i> Remove Physical Barriers	1. Is there an action plan to remove physical barriers in place?	
	2. Do the plans consider reorganizing space?	
	3. Do all events take place in barrier free locations?	
	4. Is the location on an accessible bus route or reachable by other accessible means of transportation?	
	5. Are the bathrooms accessible ?	

Creating an Inclusive Environment Self-Evaluation Checklist

<i>Environment:</i> Remove Communication Barriers	1. Are staff familiar with and making available different kinds of alternative formats for materials?		
	a) Large print b) CD	c) Audio Tape d) Braille	
	2. Do program staff know how and where to secure interpreters, assistive listening devices, or real time captioning?		
	3. Are participants asked about their needs and preference for communication access? For example: "If you need special assistance to access the meeting room or to otherwise participate at this meeting, including auxiliary aids or services, please contact <i>Name/Title/Address/Contact Information</i> or (Hearing Impaired only— <i>TDD Number</i>) to request an accommodation. Please make your request at least 48 hours prior to the meeting to enable staff to implement reasonable arrangements to assure accessibility to the meeting."		
	4. Are staff and participants familiar with program procedures to handle requests for accommodations?		
	5. Is your website accessible for persons with disabilities?		
	6. Do you use visual information (words, charts, and graphics) to reinforce what is presented orally?		
<i>Environment:</i> Remove Program Barriers	1. Do program materials offer individuals the opportunity to request an accommodation?		
	2. Do you let participants have additional time to complete assignments or take a test?		
	3. Do you offer the participant an aide, volunteer, or flexibility to bring a friend or family member to help maintain attention and understanding?		
	4. Do you offer follow up instruction, individually, as needed?		
	5. Do you provide a balance of active and passive activities within a lesson?		
	6. Do you use real life examples and concrete		

Creating an Inclusive Environment Self-Evaluation Checklist



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	materials whenever possible?	
	7. Do you provide an overview of the content or expected learning objectives at the beginning of the session?	
	8. Do you repeat, paraphrase, and summarize all important points?	
	9. Do you encourage participants to ask questions?	
	10. Do you encourage participants to work in pairs or small teams to learn by doing?	
	11. Do you use hands on activities, pictures, or diagrams to provide alternative ways of learning abstract or more complex concepts?	
<i>Environment: Utilize Community Resources</i>	1. Have you developed relationships with community disability organizations to learn more about removing physical, communication, or program barriers?	
	2. Have you asked leaders with disabilities in your community to either identify resources or help provide reasonable accommodations ?	
	3. Have you invited the leaders or community disability organization staff to assess your barrier free environment?	
	4. Have you invited these leaders to help train your staff to be proactive in identifying and solving accessibility challenges?	

Resources

- ▶ Assets for Independence Resource Center – Serving People With Disabilities:
<http://www.idaresources.org/disability>
- ▶ Assets for Independence Resource Center – Financial Education:
<http://idaresources.org/page?pageid=a047000000ApiTG>

ADA National Network

The National Institute on Disability and Rehabilitation Research (NIDRR) has established ten regional centers to provide information, training, and technical assistance to employers, people with disabilities, and other entities with responsibilities under the Americans with Disabilities Act (ADA). The centers act as a “one-stop” central, comprehensive resource on ADA issues in employment, public services, public accommodations, and communications.

Each center works closely with local business, disability, governmental, rehabilitation, and other professional networks to provide ADA information and assistance. Programs vary in each region, but all centers provide the following:

- ▶ Technical Assistance
- ▶ Education and Training
- ▶ Materials Dissemination
- ▶ Information and Referral
- ▶ Public Awareness
- ▶ Local Capacity Building

Contact Information

Call the toll-free number: (800) 949-4232 (V/TTY) for information, materials, technical assistance, or training on the ADA. This number will automatically route your call to the Center in your region. The contact information for your Regional ADA Centers is listed below:

Region 1

(Connecticut, Maine, Massachusetts, New Hampshire, Rhode Island, Vermont)

[New England ADA Center](#)—Institute for Human Centered Design
(formerly Adaptive Environments)

180-200 Portland Street, First floor, Boston, Massachusetts 02114

Phone: (617) 695-0085 (V/TTY)

Fax: (617) 482-8099

E-mail: adainfo@newenglandada.org

Web site: <http://www.NewEnglandADA.org>

Region 2

(New Jersey, New York, Puerto Rico, Virgin Islands)

[Northeast ADA Center](#)—Cornell University

201 Dolgen Hall, Ithaca, New York 14853-3901

Phone: (607) 255-6686 (Voice and TTY)

Fax: (607) 255-2763

E-mail: dbtacnortheast@cornell.edu

Web site: www.dbtacnortheast.org

Region 3

(Delaware, District of Columbia, Maryland, Pennsylvania, Virginia, West Virginia)

[Mid-Atlantic ADA Center](#)—TransCen, Inc.

451 Hungerford Drive, Suite 700, Rockville, Maryland 20850

Phone: (301) 217-0124 (V/TTY)

Fax: (301) 217-0754

E-mail: adainfo@transcen.org

Web site: www.adainfo.org

Region 4

(Alabama, Florida, Georgia, Kentucky, Mississippi, North Carolina, South Carolina, Tennessee)

[Southeast ADA Center](#)—Project of the Burton Blatt Institute—Syracuse University

1419 Mayson Street, Atlanta, Georgia 30324

Phone: (404) 541-9001 (V/TTY)

Fax: (404) 541-9002

E-mail: sebtacproject@law.syr.edu

Web site: www.sebtac.org

Region 5

(Illinois, Indiana, Michigan, Minnesota, Ohio, Wisconsin)

[Great Lakes ADA Center](#)—University of Illinois/Chicago Department on Disability and Human Development

1640 West Roosevelt Road, Room 405, Chicago, Illinois 60608

Phone: (312) 413-1407 (V/TTY)

Fax: (312) 413-1856

E-mail: <http://www.adagreatlakes.org/WebForms/ContactUs/>

Web site: www.adagreatlakes.org

Region 6

(Arkansas, Louisiana, New Mexico, Oklahoma, Texas)

[Southwest ADA Center](#)—Independent Living Research Utilization

2323 South Shepherd Boulevard, Suite 1000, Houston, Texas 77019

Phone: (713) 520-0232 (V/TTY)

Fax: (713) 520-5785

E-mail: dlrp@ilru.org

Web site: www.dlrp.org

*Region 7**(Iowa, Kansas, Missouri, Nebraska)*[Great Plains ADA Center](#)—University of Missouri/Columbia

100 Corporate Lake Drive, Columbia, Missouri 65203

Phone: (573) 882-3600 (V/TTY)

Fax: (573) 884-4925

E-mail: brinkhoffj@missouri.eduWeb site: www.adaproject.org*Region 8**(Colorado, Montana, North Dakota, South Dakota, Utah, Wyoming)*[Rocky Mountain ADA Center](#)—Meeting the Challenge, Inc.

3630 Sinton Road, Suite 103, Colorado Springs, Colorado 80907

Phone: (719) 444-0268 (V/TTY)

Fax: (719) 444-0269

E-mail: technicalassistance@mtc-inc.comWeb site: www.adainformation.org*Region 9**(Arizona, California, Hawaii, Nevada, Pacific Basin)*[Pacific ADA Center](#)

555 12th Street, Suite 1030, Oakland, California 94607-4046

Phone: (510) 285-5600 (V/TTY)

Fax: (510) 285-5614

E-mail: adatech@adapacific.orgWeb site: www.adapacific.org*Region 10**(Alaska, Idaho, Oregon, Washington)*[Northwest ADA Center](#)—University of Washington

6912 220th Street SW, #105, Mountlake Terrace, Washington 98043

Phone: (425) 248-2480 (V)

Fax: (425) 771-7438

E-mail: dbtacnw@u.washington.eduWeb site: www.dbtacnorthwest.org

Information for People with Disabilities Interested in AFI Services

What Are AFI IDAs and Who Is Eligible to Participate?

Asset Development

The theory is that asset development is what actually moves people out of poverty and keeps them out over time.

Individuals with disabilities are a natural target population for asset development because many are low income.

IDA Basics

In recent years there has been a growing emphasis on moving beyond methods for helping people move out of poverty based solely upon income supports. Current thinking in poverty reduction focuses on the accumulation of "wealth," not just on cash flow. It is all about encouraging people to save money and make investments that will increase in value over time. The theory is that asset development is what actually moves people out of poverty and keeps them out over time. Individuals with disabilities are a natural target population for asset development because many are low income. Unfortunately, this population has historically been left out of asset building programs for a variety of reasons, including lack of information about asset development in the disability program. This is beginning to change, as this new way of thinking about asset development is gaining a foothold in the disability services community.

One of the most exciting results of the asset development movement has been the introduction of Individual Development Accounts or IDAs. An IDA is essentially a special savings account held at a financial institution for individuals and families with low incomes. In using an IDA, a participant identifies a specific asset that he or she would like to acquire and works with the IDA program to develop a savings plan that will make it feasible to reach the goal and ultimately purchase the asset. The individual then begins to deposit a certain amount of earned income on a regular basis – typically monthly - into an IDA.

What makes the IDA special is that participants receive matching funds. The match rate is the amount that the IDA program contributes for each dollar that a participant saves. Match rates vary greatly across IDA programs and can range anywhere from \$1 of match for every \$1 of earnings saved to \$8 of match for every \$1 dollar saved. For example, if a program has a \$4 match rate for every \$1 dollar saved, each time a participant deposits \$25 in their IDA, an additional \$100 in matching funds would be allocated for their savings. Depending on the program, the matching funds may not actually be placed into the individual's IDA during the savings period, but could be held in a separate account by the IDA program until the participant is ready to purchase their asset. When the account holder is ready, both the savings and the match are used to purchase the asset. By leveraging saved dollars against matched dollars, individuals are able to grow their savings more quickly and be successful in purchasing an asset with long-term return potential.

AFI IDA Program Overview

There are different types of IDA programs, including those that are federally funded and those that are not federally supported, but are instead supported by state and / or private funds. While all of the IDA programs use the same basic mechanism of matched savings accounts to promote asset building, they can differ greatly in terms of who is eligible to

participate, the amount or rate of matching funds provided, the types of income that may be contributed to the account, and asset goals that individuals are permitted to save for and purchase. Another key difference is the manner in which IDA contributions and assets are treated or counted by other Federal means-tested programs, including the Supplemental Security Income (SSI) program and Medicaid. Participation in a Federal IDA program is treated differently and more favorably by other Federal means-tested programs than is participation in a state or privately funded IDA.

One federally supported IDA program is the Assets for Independence (AFI) program. The AFI IDA program is a discretionary grant program authorized under the Assets for Independence Act of 1998. The grant program is administered at the federal level by the Office of Community Services (OCS), within the Administration for Children and Families, U.S. Department of Health and Human Services.

Through this grant program, OCS supports agencies and community-based groups across the nation that run AFI projects and other programs to help low-income families build their economic assets.

All IDA programs have income and net worth requirements that must be met for participation. Eligibility is tied to household income and net worth, meaning that the IDA program will consider the income of all individuals in the family. To be eligible to participate in an AFI IDA program, the participant must qualify under one of the following two requirements:

- ▶ They must be eligible for Temporary Assistance for Needy Families, or TANF, at the time of application, OR
- ▶ Have an adjusted gross household income equal to or less than 200 percent of the Federal poverty line, and if household net worth less than \$10,000 (excluding the value of a primary dwelling unit and one motor vehicle) or if they are eligible for the federal Earned Income Tax Credit.

AFI permits the savings and match funds to be used for three specific asset goals:

- ▶ Homeownership
- ▶ Business capitalization
- ▶ Postsecondary education or training

It is important to keep in mind that not all AFI grantees will offer all three types of assets. Depending on the type of organization it is and its area of expertise, a grantee may choose to focus on only one or two of the allowable asset classes. For instance, a housing authority with AFI funds may only offer IDAs for home ownership.

Within the parameters established by the AFI legislation and rules, grantees have the ability to design the structure or rules around participant savings that are contributed to the account. As a result, there is variation among AFI IDA programs in the following areas:

- ▶ Match rate. While many of the programs match at 2 to 1 rate, or \$2 dollars in match for every \$1 saved, there are some AFI grantees that provide up to as much as an \$8 match for every \$1 dollar saved.
- ▶ The minimum initial or opening deposit, the minimum monthly savings, and the number of missed deposits allowed
- ▶ The maximum amount of savings that will be matched
- ▶ The time period over which participants are allowed to save. Generally, this time period will range from one to four years.

Aside from withdrawing the funds from their account to purchase the particular asset they have saved for, participants are only permitted access to their account funds for certain emergency needs that arise while they are participating in the IDA. After an emergency withdrawal has been made, a participant must reimburse her or his account for the full amount of funds withdrawn within 12 months. If the participant does not replenish these funds as required, he or she may not continue in the project.

Why Is This Right for You? Addressing Common Concerns and Misconceptions

Will I Lose My Social Security Disability Benefits If I Participate in an AFI IDA Project?

No. Contrary to what you may have heard, participating in an AFI IDA project will NOT cause you to lose your Social Security disability benefits.

Do you receive Social Security disability benefits under Title II of the Social Security Act?

Disability Benefits (CDB) or Disabled Widow(er)s Benefits (DWB). These Social Security programs do NOT count resources or assets in any way when determining eligibility for benefits or when calculating benefit payment amounts. If you receive a Title II disability benefit from SSA, there is no restriction on participating in an AFI IDA program.

Do you receive Supplemental Security Income (SSI)?

For SSI beneficiaries, there is a limit on countable resources of \$2,000 for an eligible individual or \$3,000 for two SSI beneficiaries who are members of an eligible couple (two SSI beneficiaries married to each other or living together and presenting themselves as married to the community). However, funds set aside in a federally funded IDA program--meaning the programs authorized by the AFI program or Temporary Assistance for Needy Families (TANF) program--are NOT counted as either a resource or as income. In fact, there is no negative effect on an individual's SSI benefit for participating in the federally funded IDA programs.



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- ▶ Any earnings an individual contributes to an AFI IDA are deducted from wages in determining countable income. This means that participating in a federally funded IDA program can actually allow you to keep MORE of your SSI cash payment.
- ▶ An individual's contributions that are deposited in an AFI IDA are excluded from resources.
- ▶ Any matching funds that are deposited in an AFI IDA are excluded from both income and resources.
- ▶ Any interest earned on the individual's own contributions and on the matching funds that are deposited in an AFI IDA is excluded from both income and resources.
- ▶ Payouts from an AFI IDA can be made only for a qualified purpose (i.e., education, business capitalization or a first home purchase) or for an allowable emergency (as determined by the IDA agency). These payouts are excluded from income. Emergency withdrawals are considered to be loans and therefore are not counted as income for SSI purposes.

How Does Participating in an IDA Affect Social Security Disability Benefits?

"Does it make sense for a beneficiary of Social Security disability programs to participate in an AFI IDA program? YES!"

Effect on SSDI benefits

While a beneficiary of the Social Security disability programs might meet the AFI IDA eligibility requirements, does it make sense for him or her to do so given the potential effect on their Social Security disability benefits? Fortunately, the answer to that question is a resounding "yes"!

Many individuals with a disability rely upon monthly cash disability benefits and medical insurance provided through the Social Security Administration. Since some of these benefits are means-tested, there is often fear that participation in a program that involves asset development might cause the loss of these critical benefits. While a beneficiary of the Social Security disability programs might meet the AFI IDA eligibility requirements, does it make sense for him or her to do so given the potential effect on their Social Security disability benefits? Fortunately, the answer to that question is a resounding "yes"!

Social Security Disability Benefits Authorized by Title II of the Social Security Act

Let's start by looking at the effect of IDA participation on Title II disability benefit eligibility and payments. The Title II disability benefits is an insurance program that an individual is entitled to, based on past work in Social Security covered employment. A person may establish eligibility for these benefits based on their own work record and insured status, or on the work record of a parent who has insured status and is disabled, retired or deceased. This benefit is often referred to as Social Security Disability Insurance or SSDI.

Accumulating resources and building wealth have never been a problem for Title II beneficiaries. Eligibility for Title II disability insurance benefits is not based on economic need and there has never been any restriction on savings, investment or asset accumulation. As a result, participating in an IDA will not adversely affect an individual's application or eligibility for Title II disability benefits.

In addition to this, once a person has established eligibility for a Title II benefit, his or her earnings contributions to an IDA will not have any effect on the cash benefit amount. Individuals receiving a Title II benefit are not penalized in any way for having cash savings, IDAs, pension funds, retirement accounts, real property, or other investments to rely upon in addition to their Social Security disability payment and Medicare coverage. Given this, IDAs are a perfect asset building vehicle for these beneficiaries.

Effect of AFI IDAs on Supplemental Security Income (SSI) Eligibility and Payment Amount

While asset accumulation is limited in the SSI program, the "good news" is that funds set aside in an AFI IDA program do NOT count toward as either income or as resources in the SSI program. Since January 1, 2001, when SSA expanded its exemptions for funds held in AFI IDAs, there is NO negative impact on an individual's SSI benefit for participating in a federally funded IDA.

First, let's take a closer look at how AFI IDAs are treated in the income test for SSI eligibility. The SSI program rules provide for the following:

- ▶ Earnings that an individual contributes to an AFI or TANF Demonstration Project IDA are deducted from wages when SSA determines countable income. The dollar amount of earnings contributed to the IDA each month is subtracted from their gross monthly wages or net earnings from self-employment, generally reducing their countable earnings by half the amount that they deposit. By reducing the amount of their countable earnings and overall total countable income, the individual may be assisted to establish eligibility for SSI when they otherwise may have had income in excess of the allowable levels.
- ▶ For individuals with disabilities under the age of 18, the IDA income deduction is also applied to the parent's IDA contributions. What this means is that if a parent establishes his or her own IDA, the earnings that they contribute to their IDA is deducted from their gross income when SSA decides if a child is eligible for SSI. Because the parent is considered to have less countable income, it results in a smaller amount of income being deemed to the child. This may result in the child being able to establish eligibility for SSI.
- ▶ In addition to IDA contributions being excluded, any matching funds that are deposited in an AFI IDA are excluded from income. Any interest earned on the individual's own contributions and on the matching funds is excluded from income.
- ▶ Disbursements from an AFI IDA used for a qualified purpose, meaning education, business capitalization or a first home purchase, are excluded from income.
- ▶ Emergency withdrawals made by a beneficiary from an AFI IDA are considered to be loans and are therefore not counted as income for SSI purposes.

Now let's look at the impact of participating in an IDA on the resource test for SSI eligibility. The AFI 2000 Amendments include a requirement that all federal means-tested programs disregard any assets that accumulate in an AFI IDA when determining eligibility or benefit levels. To this end, the Social Security Administration established SSI program rules that provide for the following disregards:

- ▶ First of all, an individual's contributions that are deposited in an AFI IDA are excluded from resources in determining both initial and ongoing eligibility for SSI. This disregard also applies to contributions that a parent of an SSI beneficiary makes to his or her own IDA in the deeming process. When a parent contributes to his or her own IDA, the money saved in the parent's IDA is not counted towards the resource limit in the deeming process.
- ▶ In addition to this, any matching funds that are deposited in an AFI IDA are excluded from resources, and any interest earned on the individual's own contributions and on the matching funds is also excluded.

There is more good news for SSI beneficiaries. Not only will an individual's contribution of earnings to an IDA be deducted during the income test for eligibility, but once eligible, the deduction is also applied in the formula SSA uses to determine SSI cash payment amount. This means that participating in a federally funded IDA program can actually allow a beneficiary to keep MORE of their SSI cash payment than they otherwise would have.

The SSI program rules allow for deducting AFI IDA contributions directly from the gross countable earnings. In the SSI formula, the amount of earnings that the individual contributes to the IDA is subtracted from gross monthly earnings or net earnings from self-employment first, before the other standard earned income exclusions are applied. For all SSI beneficiaries, excluding AFI IDA contributions directly from countable earnings results in an individual recovering half of their contribution through their SSI cash benefit. This increase in monthly SSI payment makes it more feasible for beneficiaries to save in their IDA while continuing to meet monthly living expenses!

Are There Other Asset-Building Opportunities for Individuals with Disabilities?

PASS

PASS is intended to help beneficiaries acquire the services and items they need to initially start work

Yes! In addition to AFI, the federal government sponsors two other programs to support asset developing, Plans for Achieving Self Support (PASS) and the Earned Income Tax Credit [EITC].

What Is PASS?

PASS, is a work incentive most similar to and complementary of IDAs in terms of providing an opportunity for Social Security Disability beneficiaries to save for and acquire assets. PASS permits individuals to deduct countable income, or exclude resources that would otherwise reduce or eliminate the SSI payment. PASS is an agreement between the Social Security Administration and the beneficiary. The beneficiary agrees to take outlined incremental steps to achieve a specific employment goal. The plan allows the beneficiary to use "countable income" or resources to pay for goods or services needed in order to reach the goal. In turn, the Social Security Administration (SSA) replaces the PASS expenditures by increasing the individual's Social Security Income (SSI) benefit payment. This program offers tremendous flexibility. Beneficiaries have used it to start small businesses, to pay for education and training, to purchase vehicles and necessary equipment, to pay for short-term job coaching services, to pay for child care, and for other goods or services too numerous to name here. Unlike an IDA, however, a PASS cannot be used to support homeownership.

PASS is intended to help beneficiaries acquire the services and items they need to initially start work. It is not intended to be a mechanism or means for making income or resources available to cover ongoing work costs. In addition, the intent of the PASS work incentive is not only to help a beneficiary become employed, but to become employed in a job/business that will ultimately result in increased earnings and reduce reliance on government benefits. Consequently, for a PASS to be approved by SSA, there must be a reasonable chance that an individual will be able to achieve their stated work goal and there must be a clear connection between the work goal and increased earning capacity.

One of the most valuable aspects of the PASS is that it empowers individuals with disabilities to take charge of the own path to employment and greater economic self-sufficiency. PASS empowers beneficiaries in the following ways:

- ▶ PASS reflects individual choice - Individuals choose their own work goal and determine the best route for achieving this goal.
- ▶ PASS is self-financed - Individuals use their own funds to pursue the plan. The receipt of or increase in SSI benefits replaces some or all of the funds that the individual uses for the PASS.
- ▶ PASS is largely self-directed - Individuals decide what goods and services are needed to reach the work goal, plan milestones and timeframes, and manage PASS funds when purchasing the needed goods or services.

How Does a PASS Work?

Since the SSI program is means-tested, income and resources an individual has may affect eligibility for benefits as well as how much in SSI benefits a beneficiary receives each month. A PASS allows an individual to take any type of income or resource which would normally be counted by the SSI program and set it aside in a designated account for a specific use. The countable income or resources set aside in the PASS are excluded from affecting the SSI payment amount and benefit eligibility.

For example, if an SSI beneficiary who has \$300.00 in monthly countable income commits all of it to approved PASS expenses, the SSA will disregard the \$300 when it determines SSI eligibility and payment amount. For this beneficiary, SSI benefits would replace all \$300. In cases such as this, the SSI beneficiary may receive an SSI payment up to the full Federal Benefit Rate (FBR) while still retaining the income in a PASS account. The extra SSI helps beneficiaries pay for living expenses (e.g. food and shelter) while working toward their work goal. In this manner, the SSI program is able to invest in beneficiaries who are actively pursuing employment that will lessen future dependence on public benefits.

In some instances, individuals who would be eligible for SSI except that they have excess resources or income (or both) can use a PASS to establish eligibility for SSI, which almost always means that they will be eligible for Medicaid, as well. An approved PASS allows SSA to disregard income or resources that are included in the plan and are necessary for achieving the work goal. If this disregard brings countable income or resources below the allowable limits, and the individual meets SSA's disability standard, then SSI eligibility may be established.

While PASS is generally described as an SSI work incentive, it actually can be used by beneficiaries of the Social Security Title II disability program (such as SSDI) to establish SSI eligibility. If an SSDI beneficiary receives a monthly cash benefit that is above the allowable unearned income limit, then SSI eligibility is precluded. However, if the SSDI payment is set aside under an approved PASS, and the individual meets all other SSI eligibility criteria, then eligibility for SSI may be established. The SSI payment is provided to support the basic costs of food and shelter while the SSDI payment funds the items/services the person is saving for and purchasing under the PASS.



Arlene, Community Vision, Inc.

In some cases, the extra SSI generated by a PASS will match the amount being spent in a PASS. However, each PASS situation must be computed separately to find out what the financial impact will be. Even when the PASS does not replace the money spent dollar for dollar, there may be other factors that make a PASS advantageous, such as potentially resulting in Medicaid eligibility. The long-term benefits of a successful PASS, both financial and personal, may be worth the investment now.

Requirements of a PASS

To qualify for a PASS, a person must:

1. Meet SSA's definition of disability or blindness; and
2. Meet the non-medical eligibility requirements for SSI (except for income and/or resources that can be set aside in a PASS).

For SSA to approve a PASS submitted by an eligible individual, the following basic requirements must be met:

Feasible Occupational Goal: The PASS must be specifically designed for each individual and have a designated employment goal that is reasonable and attainable. A PASS with a self-employment goal must include a detailed business plan; however, the lack of a business plan should not delay an individual's submission of a request for a PASS. The PASS could initially cover any costs associated with the development of a business plan.

General small business start-up costs will be approved for a minimum of at least 18 months, if necessary for business operation.

Earnings Requirements: The work goal must be expected to provide enough earnings within a reasonable period of time after completion of the PASS to substantially reduce the individual's SSI benefits and to eliminate any SSDI benefits the individual receives. Higher earnings potential may exist even if the person is working in the same job. The individual may use the PASS to increase the number of work hours or reduce excludable work expenses (e.g., decrease job coach costs) and, thus, increase countable income for SSI purposes.

Interval Steps/Milestones: The PASS must include specific steps or milestones and corresponding timeframes leading to attainment of the work goal. These demonstrate the person's progress toward achieving the goal and should be described sufficiently so that completion of steps is readily discernible.

Definable Timeframe: Specific time frames must be established for the PASS. Schedules must be provided for meeting the vocational goals, including the month and year the participant expects to begin working on the goal and when the goal will be achieved. The time allotted must be reasonable for achieving the goal and reflect the person's estimated time for completing the goal. While PASS is a time limited work incentive, there are no set time limits or maximum time frames under which a PASS may operate. SSA's rules require that PASS Specialists take into account individual needs and the specific employment goal when determining a reasonable time limit for achieving the goal.

The Plan for Achieving the Goal Must Be Viable: The actual plan for achieving the occupational goal must be realistic and viable. When making this determination, SSA will consider the individual's education and training needs, any assistive technology required, and the interval steps (and the corresponding time frame to complete each step) necessary to actually secure employment or start a business.

Sources to be Set Aside: PASS plans must clearly identify the sources and the amount of income or resources to be set aside. This may include anything that would otherwise cause ineligibility for SSI or reduced SSI payments such as earnings, SSDI, benefit supports (other than SSI), savings accounts, in-kind support and maintenance (ISM), deemed income from parents or spouse, stock dividends, and loans (loans don't count as income, but do count as resources if they are not spent).

Expenditures: The PASS must state how the money set aside will be spent to achieve the occupational objective. A list must be included of monthly planned expenditures by grouping or category with an explanation of their connection to the occupational objective. Goods and services under the PASS may be bought outright, rented, or leased. Examples of common PASS expenditures include:

- ▶ Supported employment services such as job development and job coach services;
- ▶ Equipment, supplies, operating capital, and inventory required to establish a business;
- ▶ Tuition, books, supplies and all fees and costs imposed, by or in connection with, an educational or occupational training facility including tutoring, counseling, etc.;
- ▶ Attendant care;
- ▶ Child care;
- ▶ Additional costs incurred for room and board away from principal residence which is required to attend educational, training, employment, trade, or business activities;
- ▶ Equipment or tools either specific to individuals' conditions or designed for general use (i.e., for individuals without disabilities);
- ▶ Dues and publications for academic or professional purposes;
- ▶ Uniforms, specialized clothing, or safety equipment (everyday clothing is not allowable);
- ▶ Basic life skills training if currently pursuing an occupational objective and the training is necessary for attaining the objective;
- ▶ Medical and social services;
- ▶ Operational or access modifications to buildings or vehicles to accommodate disabilities;
- ▶ Least costly alternatives for transportation, including public transportation and common carriers, hiring private or commercial carriers, or assistance with purchase of a private vehicle;
- ▶ Preparation fees for developing a PASS;
- ▶ Licenses, certifications, and permits required for employment (government imposed penalties, fines, or income taxes are not allowable).

Organization: The PASS must be in writing and SSA has established form SSA-545 to assist in completing a comprehensive plan. Individuals should use form SSA-545 when initiating a PASS. The PASS form may be accessed online by going to:

<http://www.socialsecurity.gov/online/ssa-545.html>

Who Would Benefit from Using a PASS?

While PASS is a powerful work incentive, not every individual who meets SSA's definition of disability would benefit from developing such a plan. Some characteristics of the most likely candidates for a PASS would be individuals who:

- ▶ Are already receiving rehabilitation services (training counseling, therapy) from one or more of the following entities: the state vocational rehabilitation (VR) agency; state agency for the blind; other public agency (e.g. Department of Veterans Affairs); an approved Employment Network, or a private community rehabilitation agency;
- ▶ Are in education or training programs or planning to attend such programs;
- ▶ Are currently working or seeking work including self-employment;
- ▶ Express an interest in rehabilitation;
- ▶ Express an interest in becoming self-supporting and decreasing dependence on Social Security disability benefits;
- ▶ Would otherwise have initial eligibility denied or continued eligibility suspended or terminated solely due to excess income (including Title II benefits) or resources; or
- ▶ Would otherwise have their SSI benefit reduced due to income.
- ▶ Individuals who, although being blind or having a disability, usually may not qualify for a benefit from a PASS include those who:
 - ▶ Are not interested in pursuing employment or self-employment which would increase self-sufficiency and decrease dependence on public benefits;
 - ▶ Previously used a PASS to secure the needed items and services that they identified as being sufficient to make them employable, but have not tried to secure their stated employment goal;
 - ▶ Are ineligible for SSI benefits for any reason other than excess income or resources;
 - ▶ Are under age 15 or over age 65;
 - ▶ Do not have any income or resources to set aside and do not expect to have any;
 - ▶ Are unwilling to use set aside funds strictly for the PASS; or
 - ▶ Do not require any additional items or services to become employed.

Earned Income Tax Credit Fact Sheet

File it. Claim it. Keep it. It's your money!

Overview

Many people with disabilities are eligible to receive the Earned Income Tax Credit (EITC), but don't know it. For example, in 2011, if you worked in 2010 and you qualify for the EITC, you could receive up to \$5751. Your State may also have a separate Earned Income Tax Credit that you could qualify to receive.

Nationwide in 2010, over 26 million people received nearly \$59 billion in EITC. Yet, individuals with disabilities continue to leave millions of dollars in EITC unclaimed.

EITC and Public Benefits

Your Federal EITC payments do NOT affect eligibility for several public benefits, including Medicaid, Supplemental Security Income (SSI), Social Security Disability Insurance (SSDI), Food Stamps, federally assisted housing, Temporary Aid to Needy Families (TANF), or other “programs funded in whole or in part with federal funds”¹. That means that you will not see a change in your monthly benefit that month because you received EITC money.

We know that you may also be concerned about assets and resource limits. Your Federal EITC payment will not count as a resource/asset against any public benefit you receive that is supported by Federal dollars (for example your SSI, Medicaid, Food Stamps, HUD Housing assistance, etc.) for 12 months.

After 12 months, funds may count as a resource. One way to protect yourself from impacting benefits is to invest some or all of your refund in a federally funded individual development account (IDA). Federally funded IDAs provide an asset building opportunity through a matched savings account that may not count as an asset against public benefits.

File your Taxes to Claim the EITC and Public Benefits

You *must* file a federal return to claim your Earned Income Tax Credit. Even if you are not required to file based on your earnings, if you don't file, you can't claim.

Volunteer Income Tax Assistance (VITA) sites are available around the country to help you file your taxes *for free*, check to see if you are eligible for the EITC and other tax credits and help you capture the money owed to you.

To locate the nearest VITA site, call [1-800-906-9887](tel:1-800-906-9887).

Comments or More Information

This is one in a series of fact sheets on asset-building for people with disabilities produced for the Assets for Independence Resource Center. For more information, visit the resource center website at www.IDAresources.org or contact the center on 1-866-778-6037 or via email at info@IDAresources.org.

Laws and regulations are evolving human institutions, and this reference is not intended as an authoritative source. For current and definitive information, consult the Social Security Administration (<http://www.ssa.gov>) or the Internal Revenue Service (<http://www.irs.gov>).

[i] The Tax Relief, Unemployment Insurance Reauthorization and Job Creation ACT of 2010, SEC. 6409. REFUNDS DISREGARDED IN THE ADMINISTRATION OF FEDERAL, PROGRAMS AND FEDERALLY ASSISTED PROGRAMS. Page 22, <http://www.gpo.gov/fdsys/pkg/BILLS-111hr4853enr/pdf/BILLS-111hr4853enr.pdf>