



EDUCATION and WORKFORCE DEVELOPMENT CABINET  
Department of Workforce Investment

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**SERVICE FEE MEMORANDUM**

TO: Office of Vocational Rehabilitation Staff  
Client Assistance Program Administrator

FROM: Cora McNabb  
Executive Director  
Office of Vocational Rehabilitation

THROUGH: Kellie Scott  
Program Administrator  
Office of Vocational Rehabilitation  
  
Benefits Analysis Team  
Office of Vocational Rehabilitation

DATE: Effective December 18, 2020

RE: Benefits Analysis

This Service Fee Memorandum is to encourage the use of Disability Benefits 101 (DB101), in-house Kentucky Work Incentive Counselors (KWIC's), or the Work Incentive Planning and Assistance (WIPA) program prior to paying for Benefits Analysis services.

**Benefits Counseling must be offered to all individuals who receive disability benefits from Social Security** (including Supplemental Security Income, Social Security Disability Insurance, etc.).

One option is to use [Disability Benefits 101](#). This internet tool enables consumers to understand the impact of work on their benefits. It may be used by anyone in conjunction with or in place of a formal Benefits Summary & Analysis (BS&A).

Counselors can refer consumers who want or need more in-depth information for a formal Benefits Summary & Analysis. It is best practice to complete the Benefits Summary & Analysis prior to the Individualized Plan for Employment; however, referrals can be made at any point, as needed. Before authorizing to pay for a Benefits Summary & Analysis, referrals to an Office of Vocational Rehabilitation Work Incentive Counselor or a Work Incentive Planning and Assistance program should be considered.

### **Office of Vocational Rehabilitation Kentucky Work Incentive Counselors**

Referrals to the Office of Vocational Rehabilitation's Kentucky Work Incentive Counselors should include the Benefits Planning Query (BPQY), OVR-2, and a brief statement explaining the reason for the referral. The Office of Vocational Rehabilitation Kentucky Work Incentive Counselors are considered in-house or staff provided services as they are contracted and there is no authorization for services.

Based on their availability, the Kentucky Work Incentive Counselors may recommend a referral to a Work Incentive Planning and Assistance program or an outside vendor qualified to provide the Benefits Analysis service. Please refer to the Certified Work Incentive Counselors list on the Office of Vocational Rehabilitation website at [Social Security and Ticket-To-Work Services](#).

### **Work Incentive Planning and Assistance Programs**

As of August 1, 2015, Social Security funded two Work Incentive Planning and Assistance programs to serve Kentucky for a five-year period, which has been extended until June 30, 2021. The Center for Accessible Living (CAL) serves roughly the western half of the state and Goodwill Industries of Kentucky (Lexington) serves the eastern half. There is no charge for this service so no authorization is necessary. However, a release of information should be signed by the consumer and sent to the Work Incentive Planning and Assistance Program so that a report may be obtained.

The Work Incentive Planning and Assistance programs serve Supplemental Security Income and Social Security Disability Insurance recipients between the ages of 14 and full retirement age.

It is good practice for the Office of Vocational Rehabilitation Counselor to tell the consumer that a Certified Work Incentive Counselor (CWIC) will be calling in the next couple of days for an initial intake and that the Certified Work Incentive Counselor will introduce themselves and explain the Work Incentive Planning and Assistance program process. The Work Incentive Planning and Assistance program will help the consumer with the Benefits Planning Query process and will verify all benefits, state and federal, received.

Both Work Incentive Planning and Assistance programs are providing written, individualized Benefits Summary & Analyses to all Office of Vocational Rehabilitation consumers, regardless of where they are in the process of deciding on an employment goal, unless the consumer declines Work Incentive Planning and Assistance services or is found ineligible. If either of these is the case, the Work Incentive Planning and Assistance Certified Work Incentive Counselor will inform the Office of Vocational Rehabilitation Counselor.

If a Certified Work Incentive Counselor is unable to reach a referral, the Office of Vocational Rehabilitation Counselor will be notified. Please refer to the Certified Work Incentive Counselors list on the Office of Vocational Rehabilitation website at [Social Security and Ticket-To-Work Services](#).

### **Authorizations to Vendors**

Federal guidelines indicate that the agency should use comparable benefits, such as Work Incentive Planning and Assistance programs or Kentucky Work Incentive Counselors as appropriate, prior to paying for a service. There may be situations, however, when a counselor determines that a consumer would receive more benefit from purchasing the service from an outside vendor in order to best meet the needs of that consumer. Such examples could be accessibility, timeliness, etc.

The vendor should be Certified as a Work Incentive Counselor or a Community Partner Work Incentive Counselor (CPWIC) through the Work Incentive Training Projects at Virginia Commonwealth University or certified through Cornell University's online Work Incentive program. Documentation that the certification is up-to-date must be provided and will be monitored by the Office of Vocational Rehabilitation. A list of all Certified Work Incentive Counselors will be maintained on the Office of Vocational Rehabilitation website at [Social Security and Ticket-To-Work Services](#).

Expectations: Within sixty (60) days of receiving the referral for a Benefits Analysis, the Certified Work Incentive Counselor or Community Partner Work Incentive Counselor must meet with the consumer and:

1. Gather pertinent information and obtain a Benefits Planning Query and verification of other Federal and State benefits (e.g., Medicaid, Medicare, Food Stamps, attendant care or Medicaid waiver services).
2. Prepare a Benefits Analysis that, at a minimum, must include:
  - a. The consumer's name, contact and demographic information;
  - b. The consumer's goals for employment and earnings;
  - c. An overview of the Social Security work incentives that apply to the consumer;
  - d. The impact of employment on Social Security, health care, and other State and Federal benefits received by the consumer; and
  - e. Strategic Plan for Work Incentives Management and Support.
3. Depending on the complexity of the situation, the Counselor may request the Certified Work Incentive Counselor/Community Partner Work Incentive Counselor meet or confer by telephone with the Counselor and the Consumer prior to the payment of the fee.

### **Work Incentive Follow-Up Support**

Work Incentive Follow-up Support can be for the following (after the original Benefits Summary and Analysis is provided and paid):

- a. Assistance with developing, implementing & tracking a Plan for Achieving Self Support (PASS).
- b. Assistance with reporting wages or training on how to report.
- c. Assistance with claiming work incentives, such as Impairment-Related Work Expenses, Subsidies, 1619b, etc.
- d. Assistance with any other issues related to Social Security that may affect the individual's pursuit of employment and/or ability to earn wages.
- e. Assistance with understanding Ticket to Work services available after Vocational Rehabilitation case closure and identifying an Employment Network to provide those services. (This should not be authorized if a conflict of interest exists - i.e., the vendor's agency is an Employment Network.)

## Fee Schedule

The following services must be provided by a Certified Work Incentive Counselor/Community Partner Work Incentive Counselor:

1. Benefits Analysis:

- Expenditure Code: 10V
- Budget: Consumer Services Budget
- Fee: \$450
- Payable upon receipt of invoice and written benefits analysis report.

2. Work Incentive Follow-Up:

- Expenditure Code: 90W
- Budget: Consumer Services Budget
- Fee: \$50 per hour; 10 hours maximum
- Payable upon receipt of invoice and written notes from meeting and should not be paid on cases which are closed.

Contact information for qualified vendors and the Work Incentive Planning and Assistance programs can be located on the Office of Vocational Rehabilitation website under Program Services, [Social Security and Ticket-To-Work Services](#).