

Part II Chapter 15 – Providing Follow-up Services in the WIPA Program

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Chapter 15 – Providing Follow-up Services in the WIPA Program

Learning Objectives

After you have read this chapter and completed the associated lectures and activities during WIPA Initial Training, you should be able to:

1. Describe which beneficiaries require follow-up services in the WIPA program.
2. Describe proactive follow-up services and identify points in time CWICs would provide proactive follow-up.
3. Identify critical touch points that indicate a need for proactive follow-up for Title II disability beneficiaries and SSI recipients.
4. Describe the steps CWICs should take when a beneficiary experiences an unexpected benefits problem.
5. Describe strategies for developing follow-up plans.
6. Describe when follow-up services end in the WIPA program.

List of Acronyms

- BEP – Break-Even Point
- BPQY – Benefits Planning Query
- BS&A – Benefits Summary and Analysis
- BWE – Blind Work Expenses
- CDR – Continuing Disability Review
- EIE – Earned Income Disregard
- EPE – Extended Period of Eligibility
- EPMC – Extended Period of Medicare Coverage
- EXR – Expedited Reinstatement
- GIE – General Income Exclusion
- IRWE – Impairment Related Work Expenses
- MQP – Medicare Qualifying Period
- PASS – Plan to Achieve Self-Support
- SEIE – Student Earned Income Exclusion
- SGA – Substantial Gainful Activity

- TWP – Trial Work Period
- UWA – Unsuccessful Work Attempt

Introduction

WIPA services do not stop once you develop the Benefits Summary & Analysis (BS&A) report and counsel the beneficiary. Services you deliver from this point forward include helping the beneficiary report wages, use applicable work incentives, resolve benefits issues, and successfully manage benefits over time. By conducting timely follow-up services, you help beneficiaries achieve their employment goals and avoid benefit problems related to working.

Determining Who Receives Follow-up Services and for How Long

Not all beneficiaries who receive WIPA services will want or need ongoing follow-up services. The WIPA Terms and Conditions Document states that all beneficiaries receiving a BS&A report should also receive an offer of follow-up services, including re-contact at critical touch-points. The CWIC will need to explain what follow-up services entail based on the beneficiaries unique situation, as well as the benefits of accessing additional support overtime. When the beneficiary agrees to follow-up services, the CWIC will work with the beneficiary to develop a plan, and then provide follow-up according to the plan.

In the WIPA program, following up with employed beneficiaries and beneficiaries about to begin a job is often useful. A primary purpose of following-up with this group is to confirm they are successfully fulfilling their reporting responsibilities, or are prepared to begin reporting once employment begins. A second purpose is to help prepare the beneficiary for the effect of paid employment on their benefits. When conducting follow-up with employed beneficiaries, CWICs check to make sure that applicable work incentives are applied properly so that beneficiaries avoid potential benefits problems related to work. For example, when working with Title II disability beneficiaries, CWICs follow-up to make sure Trial Work Period (TWP) months are tracked correctly and that Social Security knows about Impairment Related Work Expenses (IRWEs) or Subsidy when Social Security conducts work Continuing Disability Reviews (CDRs)

and makes Substantial Gainful Activity(SGA) determinations. When CWICs work with SSI beneficiaries, they follow-up to make sure the SSI cash payment is reduced on time, and that work incentives such as IRWEs, Blind Work Expenses (BWEs) or Student Earned Income Exclusion (SEIE) are applied to reduce countable earned income.

CWICs also provide follow-up services for certain individuals who are not yet employed, but who have completed the BS&A report process and have unmet needs related to benefits. For Title II disability beneficiaries, this may include undeveloped past work that the CWIC needs to help the beneficiary report. For an SSI beneficiary, the CWIC may need to help with reporting a change in marital status or change in living arrangement that would affect the SSI cash payment. The CWIC would identify these issues during intake services. The BS&A report would describe the potential problem and give recommendations about how to resolve it. The CWIC follows-up with the beneficiary to see if the recommended actions described in the BS&A report have been completed, or if additional assistance is needed.

Not everyone who gets individualized services and a BS&A report will require follow-up contact. Individuals who do not have identified benefits issues or unmet needs and who are not employed or on the brink of employment typically do not require proactive follow-up services. CWICs should still offer follow-up services to the beneficiary. The follow-up services may be a periodic check-in to determine if any changes have occurred or if there is a presenting need for more individualized services.

Base your plan for follow-up on each individual's circumstances. As you plan for follow-up, you should outline the length of time you plan to spend working with a beneficiary and the supports the person will require moving forward. Action steps you detail in the BS&A report may involve intense assistance for a short period of time, lower levels of support spread out over months or years, or in some cases – both. There is no minimum or maximum timeframe for follow-up. It all depends on the beneficiary's needs and preferences.

When to Follow-Up with Beneficiaries — Proactive versus Reactive Contacts

High-quality WIPA follow-up services involve proactive contact with the beneficiary. By conducting proactive follow-up, CWICs are able to identify

potential problems and prevent them from occurring. Proactive follow-up has the following characteristics:

- You and the beneficiary agree on contact occurring at scheduled intervals;
- You describe planned interaction between you and the beneficiary, or other key stakeholders in the BS&A report;
- Interaction provides an opportunity to reassess the individual's employment and benefit status; and
- Follow-up helps the beneficiary anticipate benefit changes and reduces the likelihood that problems will occur, or that they will be a surprise if they do occur.

You should do the following to provide proactive follow-up:

- Conducting periodic "wellness" checks with employed beneficiaries to determine if the beneficiary is progressing without problems. Although not required, we recommend reaching out to beneficiaries on a monthly basis for at least the first three months of employment. By making these proactive contacts, you can check to see if beneficiaries are reporting wages and work incentives information properly, and answer questions the beneficiary might have.
- Initiating contact with beneficiaries at critical transition points. These are points in time or events that would potentially cause changes in benefit status and require your assistance. Examples include the start of a job, the end of the TWP, nearing the 18th birthday, an impending marriage, etc. CWICs identify critical transition points in the BS&A report and address them when they become relevant to the beneficiary.
- Making routine contact with beneficiaries in the form of letters, phone calls, email messages, and benefits updates to keep the lines of communication open. The more contact a beneficiary has with you, the more likely they are to ask questions or provide status updates. Only do this with the beneficiaries' consent.
- Encouraging beneficiaries to contact you whenever they receive correspondence from Social Security, experience any changes in benefits or employment situation, or have questions. Be sure to return phone calls and emails from beneficiaries promptly. It is

important that beneficiaries know you are available to provide information and assistance whenever the need arises.

Critical Touch Points

Critical touch-points might involve a change in benefits. You need to explain the potential change to the beneficiary and to make sure the change occurs as expected. There are different critical touch points depending on which type of benefit an individual receives.

Common critical touch-points for Title II beneficiaries:

- Beginning a new job or an increase in earnings
- Beginning and end of the TWP
- Beginning and end of the Extended Period of Eligibility (EPE)
- Completing the Medicare Qualifying Period (MQP)
- Identifying and using work incentives such as IRWE or Subsidy/Special Conditions, or Unsuccessful Work Attempts (UWA)
- Work CDRs and SGA determinations
- Beginning and end of the Extended Period of Medicare Coverage (EPMC)
- Attainment of dual entitlement
- Transition to retirement benefits at Full Retirement Age

Common critical touch-points for SSI beneficiaries:

- Changes in earned or unearned income
- Reaching the level of earnings that would cause cash payments to cease and the beneficiary should transition to 1619(b)
- Identification and use of IRWEs or BWEs
- Changes in student status or attainment of age 22 for SEIE
- Approval of a Plan to Achieve Self-Support (PASS) and subsequent review points
- Attainment of age 18

- Reaching insured status for Title II benefits or reaching age 62 with prior insured status
- Changes in living arrangement, marital status, or resources

Common critical touch-points that affect both SSI and Title II beneficiaries:

- Changes in earnings status including start or end of employment and changes in amount of earned income
- Cessation of benefits due to medical improvement
- Expedited Reinstatement (EXR) eligibility

Reactive Follow-Up

CWICs can predict when some critical touch-points will occur because they are based on specific timeframes or circumstances. For example, once a beneficiary starts working, CWICs should be able to predict when wages will trigger the start of the TWP. The CWIC may not be able to predict other touch points in advance. For example, when an SSI beneficiary's father passes away, that person may become eligible for Childhood Disability Benefits (CDB), which will in turn affect SSI eligibility or payment amount. This would be a very important critical touch point, but not something a CWIC can foresee.

Reactive follow-up occurs when CWICs discover that an unforeseen event has happened that would affect benefits. Sometimes this happens when the beneficiary reaches out to the CWIC after receiving correspondence from Social Security. For example, an SSI beneficiary may receive a letter from Social Security saying that benefits will stop and an overpayment has occurred due to excess resources the agency discovered during a periodic redetermination. Other times, CWICs discover that a critical touch point has happened during a routine check-in with the beneficiary. For example, an employed individual who receives CDB tells the CWIC that he recently got married to someone who is not a beneficiary.

When CWICs discover that something unexpected occurs that could change an individual's benefits, their responsibilities include the following:

- Investigate the situation thoroughly, using all available information sources.

- Explain to the beneficiary what caused the current situation or problem and how benefits are likely to change.
- Identify options for resolving the problem or minimizing its effects, and explain the pros and cons of each option.
- Support the beneficiary to develop a plan to resolve the problem. The plan should clearly describe what actions the beneficiary, the CWIC, and any other concerned parties would take.
- Check-in with the beneficiary within appropriate timeframes to make sure things are progressing as planned. Be sure to answer any questions the beneficiary has and offer additional support as needed moving forward.

No matter how diligent CWICs are in performing proactive follow-up, there will be instances when unexpected events result in benefit changes. To minimize reactive follow-up, the CWIC needs to teach beneficiaries to recognize possible benefit touch points and encourage them to initiate contact with the CWIC and make required reports to Social Security.

Providing Effective Follow-up Services

Effective follow-up services support beneficiaries to achieve their employment goals while preventing unexpected benefit problems related to work. This section describes common characteristics of successful WIPA follow-up services.

Follow-up Services Are Planned

As described above, the most effective follow-up services are proactive. When CWICs deliver follow-up services in the right way at the right time, they serve as a powerful tool to prevent benefit problems from happening. That means CWICs need to think about when each employed beneficiary will need follow-up in the future and develop a clear plan for when and how follow-up will occur. While there is no standard required follow-up planning format or template, during initial training your instructors will review several options WIPA programs may use. Quite simply, the plan needs to list points in time that the CWIC will initiate contact with the beneficiary, and clearly describe events that should prompt the beneficiary to reach out to the CWIC. These points in time will include the critical transition points that apply to the beneficiary, but may also include regularly scheduled check-up contacts. Whatever follow-up planning

format you use should be simple, straightforward and easy for the beneficiary to understand. It may be as simple as an itemized “to-do” list included at the end of the BS&A report, or a separate planning document that lists action steps with timeframes for completion. No matter what approach you use, the main objective is to ensure that beneficiaries understand when to expect contact from you, have a firm grasp on action steps to take to avoid problems, and know when to contact you.

Think about the Future

As a CWIC, you may be tempted to address all questions or concerns a beneficiary presents when they initially contact you. The problem with this approach is that the beneficiary’s initial questions or concerns are often just the surface of their overall benefit situation and need for information. In order to be truly effective, you must provide services thinking about future possible events. This means educating beneficiaries on the options that might be available in the future, such as possible eligibility for IRWEs or use of a PASS. Thinking ahead is especially critical when you are counseling younger beneficiaries, such as those transitioning from school to adult life.

Thinking ahead has limits. You must strike a delicate balance between alerting beneficiaries about potential future events and confusing beneficiaries by discussing events that are years away or are very remote possibilities. Best practice is to address only issues that have a high probability of occurring. Keep discussions of those issues within the relative near future (one year to 18 months). If you are maintaining ongoing contact with the beneficiary, there is no need to cover every issue in one or two phone calls. The advantage of ongoing follow-up is that it provides you with opportunities to explain important issues as they appear on the horizon.

Using a Customized Approach

When providing follow-up, remember that every person you serve has a unique set of circumstances and needs. The duration of follow-along planning and assistance services will not only vary from person to person, but may also vary for a particular individual over time. For example, an individual whose case was inactive after several months of your

assistance regarding a work or benefit transition may identify the need for support in developing a PASS, or responding to a CDR notice at a later point in time. It is important that WIPA services remain flexible and allow beneficiaries to access additional information and supports as needed.

Collaborating with Other Members of the Employment Support Team

Proactive follow-up also includes contact and collaboration with other members of the individual's employment support team. You should regularly communicate with other partners in the beneficiary's network. Each update and revision of the BS&A report will require collaboration with other stakeholders to identify additional tasks that you and they will need to complete in order to achieve the employment goal. Members of the employment support team may include:

- Representative payees, authorized representatives, family members, other caregivers;
- Case Managers or Service Coordinators from either the mental health or the Developmental Disabilities systems;
- Vocational Rehabilitation Counselors or Employment Network personnel;
- Supported employment personnel;
- Residential services staff; and
- Advocates.

When you delegate action steps to other team members, your role shifts to that of facilitator or coordinator. You serve as the central point of contact for all benefits and work incentives issues and monitor progress the team and beneficiary make on action steps in the BS&A report. This is an efficient way for you to oversee follow-up services.

Sharing Responsibility with the Beneficiary

Beneficiaries should be responsible for their own plan and take initiative to complete action steps. Rather than foster dependency by doing everything yourself, you should encourage and support the beneficiary to complete necessary tasks, such as initiating contact with employment

support team members, whenever possible. Be clear about action steps and expectations, and then check in with beneficiaries who miss due dates or have not provided updates.

When Follow-up Services End

WIPA services do not include any required time limits. Social Security does not encourage WIPA programs to terminate beneficiaries from the program unless an individual becomes ineligible, passes away, moves out of the program's service area, or asks that services stop. CWICs may continue to provide follow-up contact and assistance to beneficiaries as long as they remain eligible for WIPA services, need them, and desire them.

The duration and intensity of individualized services varies significantly from one beneficiary to another. For example, you may provide in-depth benefits analysis to someone who subsequently decides they are no longer interested in pursuing employment. In that situation, you don't have to follow-up, but you should encourage the beneficiary to contact you if they change their mind or have questions about benefits and work. You should keep the person's file just in case they decide to re-contact you. On the other end of the spectrum, you will serve some beneficiaries who have a series of jobs over a period of years and personal circumstances that require you to make frequent on-going contact. Most of the beneficiaries you serve will be somewhere in between these two extremes. The point is to think about what each individual needs from you in terms of follow-up and provide the level of support the person needs without taking on supports outside the benefits counseling role.

Next Steps

As you begin to provide services after achieving provisional certification, be sure to meet with your WIPA Program Director to find out what follow-up protocols are in place at your agency. You should provide services that are consistent with your colleagues. You also should ask your agency has a standard follow-up planning tool or template that CWICs in your program use.

Reach out to your TA Liaison when you have questions about follow-up. Your TA Liaison can help you decide which beneficiaries would benefit

from follow-up and help you develop an effective follow-up plan. Your TA Liaison can also review follow-up plans and provide feedback for improvement.

