



What to Include in a Benefits Summary and Analysis (BS&A) Report and What to Leave Out

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Remember that the sections in BS&A reports developed using the standard format and the BSADocs format are a little bit different. Don't worry about the exact wording of a category or get hung up on exactly where discussion of a certain topic should appear in the report. We wrote this document to help you develop a broad understanding of what to cover in a BS&A and what to leave out.

Listing Verified Benefits

What to do:

- You should list all benefits that potentially could be affected by employment in this section with monthly amounts listed as appropriate. That includes all Social Security benefits plus other federal, state or local benefits such as SNAP, HUD housing subsidies, Workers Compensation, Unemployment Insurance, private disability insurance, etc.
- If the beneficiary has dependent family members in the household (spouse and/or children) be sure to verify and list any benefits those individuals receive that could be affected by the beneficiary's employment. Things to watch for include eligible couples, Social Security child-in-care or child's benefits, and Medicaid coverage.
- If the Social Security benefit is being reduced for some reason, be sure to verify that in this section. You should list the gross and net amounts of the cash payment and clearly state why the check is being reduced. Reasons for benefit reduction could include withholding for Medicare premiums, taxes, overpayment recovery or child support or SSI reductions due to ISM, deeming, unearned income, earned income, etc.
- Be sure to include all assistance the beneficiary may be getting with Medicare out-of-pocket costs such as Medicare Savings Programs (MSP) or the Part D Low Income Subsidy (LIS). Be specific by identifying which MSP the person is enrolled in (QMB, SLMB or QI) and whether the person is getting full or partial LIS.

- If the beneficiary is eligible for Medicaid through more than one Medicaid eligibility category, each category should be verified and listed separately. For example, if an SSI recipient receives SSI related Medicaid but also participates in a Medicaid waiver program, you need to list both of these eligibility categories. Be sure to use the correct name of the Medicaid program to avoid confusion.
- Be sure to check the BPQY for statutory blindness designation. If the beneficiary shows as being stat blind, that should be listed in this section of the BS&A since it has a bearing on the work incentives you will discuss in the report.

What to avoid:

- Only include information in this section that's relevant to the counseling you are providing. For example, there's no need to verify date of disability onset or date of entitlement unless that information has some bearing on the counseling you provide in the report. You don't need to list every piece of information provided in the BPQY in this section – only that which is relevant.
- Don't include information about employment services and supports the person is getting in this section. For example, there's no need to verify here that the beneficiary has an open case with VR or has a ticket in assignment with an EN. Save all of that information for the section dedicated to employment services and supports.
- Including explanations of work incentives usage in this section would also be “too much information” or TMI. If the beneficiary had an approved PASS in the past or is currently eligible for the Student Earned Income Exclusion (SEIE), that discussion should go in other sections, not here.
- There's no need to verify benefits the individual does NOT receive. It isn't necessary to state that the beneficiary doesn't get SNAP, HUD housing subsidies, etc. The only exception to this would be when a beneficiary alleged that a benefit was received, when in fact, you verified that, it wasn't.

Current Employment Situation and Future Employment Plans and/or Earnings Goals

What to do:

- Keep discussion here focused on the person's current job and/or future employment and earnings goal if different from the current job. Be sure to include all of the relevant facts – employing company, job title, hours per week, hourly wage, estimated monthly gross earnings, and start date. **Remember – you MUST include a monthly earnings goal** in every BS&A in order to have something to analyze the benefits against.
- When you are illustrating anticipated monthly earnings, it's helpful to show any calculations you used in determining this figure. The BSADocs software does not

show calculations. If you want to provide this information, it needs to go in the “Specific to You” space.

- If the beneficiary is currently working and has been working for some time, the gross monthly wages you list in this section should be based on pay stubs or other actual wage data, rather than just a rough estimate. Remember, Social Security counts wages differently for SSI recipients than for Title II beneficiaries. For SSI recipients, wages count when they are received. In the Title II program, wages count in the month they were earned (with some exceptions). For Title II beneficiaries, Social Security will use a basic formula (rate of pay X # hours per week X 4.333) to determine monthly earnings.
- For Title II disability beneficiaries, it may be necessary to list past work since it may have some bearing on work incentives usage you discuss in subsequent sections of the report. Again, keep the content focused on employing company, job title, hours per week, estimated monthly gross earnings, and when the work occurred (start and end month/year). If the BPQY indicates that Social Security hasn’t fully developed the past work, list whatever information the beneficiary can provide or make a general statement that there appears to be undeveloped past work. You will have to revise the BS&A when all the past work is fully developed.

What to avoid:

- Nothing else should go in this section. Don’t include discussion of work incentives, employment services and supports, or anything else. Keep the content focused solely on current employment situation and/or future employment or earnings goal.

How Work will Affect Social Security Cash Benefits

What to do – Title II Beneficiaries:

- Beneficiaries who are working (or are planning to work) for the first time since entitlement who have projected earnings above the TWP guideline should receive specific information about TWP usage. If possible, project when the TWP is likely to end and be sure to illustrate your narrative using a TWP/EPE/EXR Tracking Chart.
- You should provide beneficiaries who have earnings goals just under SGA with some information about how it’s possible to earn more and still retain cash payments. Beneficiaries sometimes choose an earnings goal just under SGA because they are afraid of losing benefits and health insurance. You should include a brief discussion of the SGA determination process, and explain work incentives such as IRWE and subsidy. The only exception to this would be when the beneficiary has been very definite that he/she is not able or is unwilling to work above the stated earnings goal.
- Watch for earnings goals that would result in loss of benefits, but wouldn’t result in net wages that fully replace those benefits. CWICs have a duty to warn beneficiaries

when an earnings goal would result in less disposable income. This is critical discussion, not TMI. Be sure to include discussion about how a higher earnings goal might result in increased financial well-being.

- If the beneficiary appears to be working above SGA or has a goal to do so, be sure to ask probing questions to see if any work incentives might apply (IRWE or Subsidy/Special Conditions). If it looks like a work incentive might apply, provide specific information about the work incentive that is customized to the beneficiary. For example, if the beneficiary plans to use paratransit to and from work, explain that this expense may qualify as an IRWE. If possible, you should also provide an estimate of how much the IRWE or subsidy would be and explain how this would reduce the countable earned income.
- If past work is evident, you should provide specific information about TWP/EPE months used in the narrative and illustrate this information using a TWP/EPE/EXR Tracking Sheet.

What to avoid – Title II Beneficiaries:

- Beneficiaries with very low earnings goals (under TWP or over TWP but under SGA) do not need lengthy explanations of provisions that would result in suspended benefits, such as EXR. These beneficiaries would also not need a lengthy explanation of how SGA determinations are made with detailed discussion of the four tools Social Security uses to make SGA determinations (UWA, IRWE, Subsidy/Special Conditions, Income Averaging). A brief discussion (a few sentences) of SGA is sufficient.
- Don't provide detailed explanations of TWP and/or EPE for beneficiaries who have already used up these work incentives. Offer a very brief summary (a sentence or two) and indicate that the work incentive is no longer available. Focus your discussion on how the earnings goal will affect benefits moving forward. If the earnings goal represents possible SGA, be sure to discuss how SGA determinations are made with detailed explanations of the 4 tools used to make these determinations. Be sure to include discussion of EXR if benefit termination is possible in the near future (i.e., within the coming 18 months).
- Don't go into detail about how to report earnings in this section. That information goes elsewhere.

What to do – SSI Recipients:

- Be clear and specific in your narrative about how the current earnings or future earnings goal will affect the SSI cash payment and include SSI calculation sheets to illustrate your point. It isn't TMI to explain the SSI calculations briefly. Don't just refer the reader to the calculations sheets without providing any narrative explanation.

- Always emphasize the total financial outcome of work plus the reduced or eliminated SSI cash payment. Beneficiaries tend to focus on the fact that the SSI check will be reduced without understanding that the earnings more than compensate for that reduction. Clearly indicate how much disposable income is available after working as compared to being on SSI benefits alone.
- Show SSI recipients with low earnings goals how earning MORE always results in a better financial outcome – even if the countable earned income causes the SSI payment to stop. Focus your discussion on the positive financial benefits of working and earning more and the protections that 1619(b) provides for moving in and out of cash payment status. If the beneficiary has an earnings goal that would be over the BEP, show that in your calculation sheets, but focus your discussion on the positive aspects of earning more.
- Always check before assuming that no work incentives apply – particularly IRWE. If it's possible that the beneficiary will incur IRWEs, provide a summary explanation with examples of expenses that might qualify and encourage the beneficiary to contact you when a job offer is made so you can explore further. Remember, many SSI recipients could benefit financially from applying IRWEs if they have expenses that would qualify.
- Any beneficiary who could qualify for the Student Earned Income Exclusion (SEIE) should receive a detailed explanation of this powerful work incentive.
- Any SSI recipient who is statutorily blind should receive a detailed explanation of Blind Work Expenses. You should include an SSI calculation sheet illustrating how any incentive you discuss would affect the SSI cash payment.

What to avoid – SSI Recipients:

- Do not provide detailed discussions of the break-even point or provide calculations showing how much in earnings would cause cash payments to be reduced to zero. This practice leads SSI recipients to worry that loss of cash benefits is a problem and may lead to wage suppression.
- Remember that EXR only applies to individuals who have fully terminated from benefits due to employment. In the SSI program, 1619(b) provisions protect the overwhelming majority of beneficiaries from terminating so discussion of EXR is seldom necessary.
- Don't provide lengthy explanations of SSI work incentives (IRWE, BWE, SEIE) if they clearly would not apply to the beneficiary.
- Don't discuss PASS with a beneficiary who is not clearly a good candidate for this complex work incentive. If the beneficiary specifically asks questions about PASS, or mentioned needing items or services to achieve an employment goal, provide a brief explanation and indicate why the person is or is not a good candidate for using a PASS.

- If the beneficiary has non-employment related reductions in the SSI cash payment, it's fine to reference that briefly here, but don't include lengthy explanations of the issue or possible solutions. That information goes in the "Benefits Issues" section of the BS&A. This section should only contain information related to employment.

NOTE: There are some unique considerations for **concurrent beneficiaries that are covered in the resource document** on the VCU NTDC website (<https://vcu-ntdc.org/resources/viewContent.cfm?contentID=76>).

How Work Affects Health Insurance

What to do:

- If the beneficiary is still in the Medicare Qualifying Period (MQP), you should indicate that and verify for the person when Medicare coverage will begin. If the person is going to be working over SGA in that period and could possibly lose cash payments due to work, you should explain that the MQP will simply continue with no change. If Medicare enrollment will be soon (in the coming 6 months), be sure to explain a bit about how enrollment works. If the beneficiary seems unsure about enrolling in Parts B or D, offer brief summary information about the consequences of not enrolling initially if this coverage is needed later on.
- If the beneficiary is enrolled in a Medicare Savings Program (MSP) and/or Part D low-income subsidy (LIS) and the employment goal would affect eligibility for these programs, be sure to discuss this fully and illustrate your discussion using MSP/LIS calculation sheets as needed. If the employment goal would NOT result in a change in these programs, simply state that but don't get into a lengthy explanation or include MSP/LIS calculation sheets.
- If it's likely that Social Security would determine that the beneficiary is engaging in SGA be sure to explain the EPMC. If it appears that the beneficiary would not qualify for MSP or LIS at that point, be sure to go over how the individual will pay Part B and/or D premiums are paid. Check to see if employer sponsored health insurance is (or potentially will be) an option. If so, provide counseling on this option.
- If the beneficiary has used up all of the work incentives (TWP, EPE and cessation/grace period) and is likely to engage in SGA again, describe how long the EPMC will last. If possible, you should identify when the EPMC is likely to end. Be sure to provide explanations of additional alternatives such as Premium HI for the Working Disabled, employer sponsored health insurance, Medicaid buy-in or other options available in your area.
- If an SSI recipient has an employment goal that would NOT cause the loss of cash payments, explain that Medicaid will continue unchanged and provide a brief description of 1619(b). If the employment goal would cause the loss of cash payments, provide a detailed explanation of 1619(b) including all eligibility criteria.

- If an SSI recipient's earnings goal is likely to exceed the threshold amount for 1619(b), be sure to indicate that and explain how an individualized threshold may be established, if needed. Explore additional alternatives including Medicaid buy-in and employer sponsored coverage as needed.
- Beneficiaries who are enrolled in Medicaid waiver services must receive clear and specific information about how the employment goal will potentially affect waiver eligibility and cost sharing, if that is applicable in your state. If cost sharing will apply, include a worksheet or calculation sheet illustrating that. If the employment goal would not affect waiver eligibility or cost sharing, simply state that with a very brief discussion.
- If the beneficiary is employed and employer sponsored health insurance is an option, be sure to discuss that. If there are any anticipated interactions between various forms of health insurance (Medicare and TRICARE or employer-sponsored coverage, for example) describe those interactions and offer advice as needed.
- Be sure to check to make sure the beneficiary's health care needs are being met with the current insurance, or anticipated insurance after employment begins. If not, offer information on other options (if any).

What to avoid:

- If the beneficiary's employment goal would not cause the suspension or termination of Title II cash payments, don't provide a detailed explanation of the EPMC or ways to extend Medicare coverage after the EPMC expires (Premium HI for the Working Disabled and QDWI). A brief mention (one or two sentences) of the EPMC is sufficient. The same is true if it's going to be longer than a couple of years before the EPE would end and termination could occur. You can always address this issue in more detail later.
- Don't discuss any healthcare options for which the beneficiary is unlikely to qualify or which are not likely to be available.

How Work Affects Other Benefits

What to do:

- Provide a discussion of how the earnings goal would affect benefits the individual currently receives. If the work goal would not affect the other benefits in any way, state that clearly. If the work goal would affect other benefits, you must be specific about how. Indicate if the benefit will be reduced or if the goal will cause ineligibility. If possible, provide an estimate of how much the benefit in question will be reduced.
- Be sure to include information about any work incentives available under other federal/state or local programs.

- If you see potential eligibility for additional benefits the individual needs, you may provide referral information in this section, but be careful not to make referrals for benefits the person would not be likely to qualify for or which aren't available.

What to avoid:

- Don't get into lengthy explanations about how to report earnings to other agencies in this section. That discussion should appear ONCE in the BS&A if it is relevant and that would go in the section entitled "Other Topics" or "Other Important Items".

Employment Supports and Other Services that Could Help the Beneficiary Reach his/her Earnings Goal

What to do:

- This section should include a list of any employment services or supports the beneficiary participates in or receives. This could include having an open case with the state VR agency, getting supported employment or job placement services from a community rehabilitation provider, or participating in a career education program. You should ask what type of service or support the agency is providing if it isn't clear.
- You should ask beneficiaries about employment barriers they face or unmet need for employment services or supports. Provide specific information about, and referrals to services that will meet identified needs. Don't provide information about services the beneficiary would not be eligible for or doesn't indicate a need for. Customize information you provide in this section to fit with what each person needs. If the beneficiary is clear that all needs are being met, just state that and encourage him/her to contact you if the situation changes.

What to avoid:

- You should not provide detailed discussions of the Ticket to Work program to all beneficiaries. Not all beneficiaries will benefit from Ticket assignment and even those with a Ticket assigned or in use with the state VR agency may not benefit from a detailed discussion of the Ticket program. Reserve detailed discussion primarily for people who would benefit most from the medical CDR protections and who plan to work at a level that would preclude cash benefits. Individuals who are already working at a level that would not cause loss of cash payments with no plans to work more are not good Ticket candidates and would not benefit from detailed information about this work incentive. For individuals who have their Ticket in use with the state VR agency, be sure to explain timely progress reviews and what to expect when those reviews are done.

Other Topics Based on Benefits Issues Identified or Questions posed by the Beneficiary

What to do:

- For SSI recipients, if the SSI check is being reduced for any reason other than earned income, provide an explanation of that here. This would include deemed income, unearned income, in-kind support and maintenance, overpayment recovery, etc. If there are options for increasing the cash payment by resolving the problem, provide clear and specific explanations of those options and offer advice about how to proceed.
- If the beneficiary informs you of a pending life change that could affect benefits, be sure to address it here and provide specific information about what to expect. This could include a change in residence, change in marital status, changes in resources, etc.
- If you see benefits changes that are likely to occur in the near future (12-18 months), be sure to identify those and explain them briefly. Provide any specific instruction to the beneficiary that they may need to manage the impending change. This would also include discussion of changes that could affect eligibility for additional Social Security benefits including retirement, death or retirement of a parent, or generating sufficient work credits to establish eligibility for SSDI. Remember not to project out too far – focus on events that are likely to occur in the coming 12 to 18 months.
- If the beneficiary posed any questions related to benefits that were unrelated to working, address those questions in this section.
- This section is a great place to include information about other benefits, services, or programs the individual could take advantage of. This might include ABLE accounts, the Earned Income Tax Credit, referrals for additional assistance, or similar information.

What to avoid:

- Don't include duplicate information about work incentives or discussion of how work will affect benefits that you have addressed elsewhere in the BS&A. This section is reserved for benefits issues or other assorted topics that are unrelated to employment.
- Don't discuss potential issues or problems that are unlikely to occur or which have a very low probability of occurring unless the beneficiary asks a specific question.
- Don't provide detailed discussion of possible issues or problems which might occur in the distant future – more than 12-18 months out. Save that discussion for a later date.

Important Things for the Beneficiary to Remember

What to do:

- Many people who are not yet employed, have little if anything that needs to be addressed in this section. If there is nothing to address, simply state that.
- For an employed beneficiary or someone with a job offer pending, it's important to explain HOW to correctly report earned income – that is not considered TMI. Beneficiaries often are unclear about how to communicate with Social Security and other agencies that administer benefit programs. Include all agencies that the beneficiary needs to contact with contact information and offer specific instructions about reporting. A useful handout that provided **reporting tips to beneficiaries** is available on the NTDC website (<https://vcu-ntdc.org/resources/viewContent.cfm?contentID=45>).
- Keep in mind that SSI recipients are required to report lots of different things in addition to earned income. This is a good place to offer reminders and instructions about what the beneficiary needs to report and how to report.

What to avoid:

- Do not provide lengthy explanations of how to report wages when the beneficiary is in the early stages of preparation for employment or job search. You should provide the Reporting Tips handout from the manual and reiterate that Social Security requires beneficiaries to report all earned income. Instruct the beneficiary to re-contact you when a job offer is pending or when circumstances change.

Including Attachments with the BS&A Report

You should include companion documents to support your analysis, as appropriate. SSI Calculation Sheets and TWP/EPE/EXR Tracking Charts are an essential part of the BS&A. For example, you should create an SSI Calculation Sheet for each possible scenario in a BS&A for an SSI-only or concurrent beneficiary. In addition to the narrative that explains how income is treated in the SSI program, include a separate calculation sheet to illustrate each of the following:

- How unearned income reduces the SSI payment.
- How earned income affects the SSI payment, including the earned income exclusion.
- How each additional deduction applies to the SSI formula (SEIE, IRWE, BWE, and PASS).
- How in-kind support and maintenance (ISM) reduces the SSI payment.

When you develop the BS&A, refer to Module 3 for calculation examples. You can find a blank copy of the **SSI Calculation Sheet** on the VCU-NTDC website (<https://vcu->

ntdc.org/resources/viewContent.cfm?contentID=2). The beneficiary may want to see a comparison of different wage amounts before deciding on a level of work. Lay out the calculations side by side to provide a visual aide for the beneficiary.

For Title II beneficiaries, you should analyze the person's status with regard to the Trial Work Period, the Extended Period of Eligibility, Expedited Reinstatement, and continuation of Medicare coverage. The **TWP/EPE Tracking Chart** shows progression of these work incentives phases, so the beneficiary will know when to expect changes in his or her benefits. You can find the tracking chart on the VCU NTDC website (<https://vcu-ntdc.org/resources/viewContent.cfm?contentID=30>).