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SERVICE FEE MEMORANDUM

Benefits Counseling

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 March 1, 2023

This Service Fee Memorandum is to describe the provisions for benefits counseling by the Office of Vocational Rehabilitation (OVR). **Benefits Counseling must be offered to all individuals who receive disability benefits from Social Security** (including Supplemental Security Income, Social Security Disability Insurance, etc.). Beneficiaries receiving Community Integration Supplementation (CIS), Kentucky's state supplement, are also appropriate referrals for benefits counseling. Counseling should be provided through the online tool (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.

Counselors are encouraged to share information about [Disability Benefits 101 \(DB101\)](#). 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 BS&A prior to the Individualized Plan for Employment; however, referrals can be made at any point the service is needed. Before authorizing to pay for a BS&A, referrals to a KWIC or WIPA program should be considered.

Contact information for all approved providers can be located on the Office of Vocational Rehabilitation Forms webpage under [Social Security and Ticket-To-Work Services](#). The title of the list is “Approved Benefits Counseling Providers.”

Office of Vocational Rehabilitation (OVR) Kentucky Work Incentive Counselors

Referrals to the OVR Kentucky Work Incentive Counselors (KWIC’s) should include an email to ovrkwic@ky.gov with the case number and a brief statement explaining the reason for the referral. The Benefits Planning Query (BPQY) should be uploaded to Case Management System (CMS) before the referral. The OVR KWIC’s are considered in-house, staff-provided services as they are contracted and there is no authorization for services.

Based on their availability, the KWIC may recommend a referral to a WIPA program, or an outside vendor qualified to provide the Benefits Analysis service.

Work Incentive Planning and Assistance (WIPA) Programs

There are two agencies which provide WIPA services for Kentucky. The Center for Accessible Living (CAL) serves roughly the Louisville area and western half of the state and Goodwill Industries of Kentucky (Lexington) serves the central and eastern areas of the state. Specific counties are listed on the “Approved Benefits Counseling Providers” list. There is no charge for this service, so no authorization is necessary. However, a release of information should be signed by the consumer and a referral sent to the corresponding WIPA Program for benefits counseling.

The WIPA 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 CWIC will introduce themselves and explain the WIPA program process. The WIPA program will help the consumer with the Benefits Planning process and will verify all benefits, state and federal, received. Both WIPA programs provide written, individualized Benefits Summary & Analyses. If they are unable to serve the consumer, for any reason the WIPA CWIC will inform the OVR Counselor.

Authorizations to Vendors

Federal guidelines indicate that the agency should use comparable benefits, such as the KWIC or WIPA 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 to best meet the needs of that consumer. Such examples could be accessibility, timeliness, etc.

The vendor should be certified as a Community Partner Work Incentive Counselor (CPWIC) through the WIPA National Training and Data Center at Virginia Commonwealth University or as a Work Incentive Practitioner (WIP-C) through Cornell University's online credentialing program. Documentation that the certification is up to date must be provided and will be monitored by the Office of Vocational Rehabilitation and maintained on the "Approved Benefits Counseling Providers" list. The list is located on the OVR Forms webpage under [Social Security and Ticket-To-Work Services](#).

Expectations: Within sixty (60) days of receiving the referral for a Benefits Analysis, the WIP-C or CPWIC 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. This should include at least two scenarios which illustrate different earning levels.
 - 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.
 - e. Strategic Plan for Work Incentives Management and Support.
3. Depending on the complexity of the situation, the Counselor may request the WIP-C or CPWIC 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 purchased 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 WIP-C or CPWIC:

1. Benefits Analysis:
 - Expenditure Code: 94A
 - Budget: Consumer Services Budget
 - Fee: \$450
 - Payable upon receipt of invoice and written benefits analysis report.

2. Work Incentive Follow-Up:

- Expenditure Code: 94B
- 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.