



Disability Reform Work Group

Strategic Plan

Developed by the Michigan Department of Human Services, Michigan Rehabilitation Services, Disability Determination Service, the Disability Network and Michigan Employers

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Executive Summary

There are 700,000 working age individuals in Michigan with disabilities and nearly all of them have abilities that can add value in the workplace. Unfortunately, too often these individuals face employment barriers and a culture that does not appreciate the skills they can bring to a job. Active participation in the workplace by more of those with disabilities is a win/win. It can increase self-worth while amplifying their individual and collective “voices” in the workplace. It can also reduce dependency on permanent disability benefits while providing a pool of much needed talent to employers.

Michigan Department of Human Services (MDHS), disability groups and the business community strongly believe that all individuals, including individuals with disabilities, are “**better off working**”.

Based on this belief, a work group of MDHS staff, disability advocates and employers developed this strategic plan to advance employment opportunities for individuals with disabilities. The goals of the strategic plan include:

- Coordinating government and private agency resources in cross-program settings to assist individuals with disabilities enter or return to the workforce.
- Improving the health and well-being of individuals with disabilities by promoting work participation.
- De-emphasizing disability as a de facto public assistance program by refocusing on the goal of returning to work.

Some of these goals can be reached with changes in state policy, processes and more educational outreach. Others require legislative changes at the federal or state level.

Solutions

Assisting individuals to enter the workforce – Employees with disabilities face obstacles that other employees do not. Helping employees get past their barriers through supportive techniques and accommodations is essential to successful employment. This report provides strategies to help individuals join the workforce by providing:

- Job referrals
- Team planning
- Skill assessment and training to meet the needs of employers

Collectively these steps will help change the culture to one that embraces “Employment First” principles. These supports can be implemented without legislative changes.

Making work pay - Individuals with disabilities face ineligibility for needed disability assistance and Medicaid benefits if they exceed a limited number of wages; this deters working. By

increasing the income and asset eligibility limits, individuals would have incentive to work more hours without losing essential benefits. This goal will require legislative changes.

Increasing the marketing of the federal programs that allow increased income and asset earning will educate individuals on how they can earn/save more by working without losing assistance. This goal can be reached through better outreach and does not require legislative changes.

Helping the business community to hire and retain workers – Employers who want to hire more individuals with disabilities need assistance navigating disability-related requirements. This strategic goal combines the use of navigators, employer resource networks and other vocational specialists to help employers locate, accommodate and retain employees. These employer navigation programs can be implemented at the state level through meaningful outreach and without legislative changes.

Assisting youth to overcome barriers and transition successfully into higher education or the workforce - In 2011-2012 there were 112,872 Michigan youth with disabilities, including 43,238 youth receiving Supplemental Security Income (SSI). With necessary supports young people with disabilities can participate more fully in education and employment. Cross agency employment teams, paid work experiences and communicating a strong message about how youth with disabilities can succeed, will encourage families to support their children's transitions in school or employment and discourage reliance on their children's SSI benefits as de facto public assistance. These measures can be implemented through program development and outreach and without the need for legislative changes.

Improving the quality and uniformity of Social Security Administration administrative law judges' decisions - In addition to helping employees and employers work together, we strive to make the administrative hearing process more balanced by allowing the government an opportunity to refute the claimant's evidence. Currently only the claimant can provide evidence to support his or her claim. By not having an opportunity to counter the claimants' evidence, many claimants may be found "disabled" in error. To bring the hearing process into balance, it is suggested that:

- The government have legal representation, or
- A hearing and review board be created to review disability awards, or
- Administrative Law Judges be added to the pre-effectuation reviews of the state disability determination allowances, and
- The record be closed at the administrative hearing to prevent delays caused by introducing new evidence on appeal.

These changes will need to be made on a federal level and may require legislative changes.

Offsetting Unemployment Benefits (UIA) if an individual is receiving unemployment benefits in addition to disability payments - To receive disability (SSDI) the individual must show that he or she cannot work. Conversely, to receive unemployment benefits, the individual must be able to work. These two types of assistance cannot be reconciled, and to allow both results in double dipping. Three ideas have been introduced at the federal level to reconcile this:

1. A dollar-for-dollar decrease in SSDI for UIA benefits.
2. When determining eligibility, do not count any month that an individual receives UIA as a month of disability. In determining continuation of benefits, any month that a claimant receives both UIA and SSDI will count as a month in which the claimant either engaged in substantial gainful activity or as part of the trial work period.
3. Withhold SSDI benefits for any month in which a disabled worker receives UIA benefits.

While all three proposals will reduce overpayments and abuse of the disability system, this work group most strongly supports the second option.

The work group is convinced that fully embracing the “better off working” philosophy by implementing these solutions will help improve the lives of individuals with disabilities, provide a strong pool of talent for Michigan employers and improve stewardship of tax dollars.

Introduction

On September 26, 2013, a group came together to identify possible reforms to the current disability system. They sought to promote opportunities for Michigan's 700,000 working age citizens with disabilities to actively participate in their communities and in the workforce and to reduce the dependency on permanent disability benefits. The "Better Off Working" Disability Reform Work Group (work group) involves the public and private sectors, including representatives of Michigan Department of Human Services (MDHS), Michigan Rehabilitation Service (MRS), Disability Determination Service (DDS), Disability Networks and employers¹. The work group spent the past eight months investigating various strategies including:

- Maximization/coordination of government and private agency resources in cross-program settings to assist individuals with disabilities return to the workforce.
- Improvement of the health and well-being of individuals with disabilities by promoting work participation.
- De-emphasis of disability as a de facto public assistance program by refocusing efforts on returning to work as many individuals with disabilities as possible.

Work group members firmly believe, regardless of disability, that all individuals are better off working.

The work group identified the following areas for reform:

- Encourage and assist individuals with disabilities to enter or return to the workforce.
- Develop incentives for individuals with disabilities to enter or reenter the workforce.
- Assist employers to hire and retain individuals with disabilities.
- Provide needed support systems for youth with disabilities to transition into the workforce.
- Improve the quality and uniformity of Social Security Administration (SSA) administrative law judges' decisions.
- Offset Social Security benefits if the individual is also receiving unemployment benefits.

I. Assist individuals with disabilities to enter or reenter the workforce

An individual with a disability who has the ability to enter or reenter the workforce may choose not to do so for several reasons, including:

- An overall culture that does not recognize the individual's abilities and skills.
- The lack of focused and coordinated training.
- A fear that employers do not want to recruit and hire an individual with a disability.

¹ The work group continues to meet with other agencies that provide services to individuals with disabilities (e.g. Bureau for Services to Blind Persons, Advisory Council on Deaf and Hard of Hearing, Michigan Special Education) to ensure a focus on all individuals with disabilities and to identify whether services can be streamlined to avoid duplication and confusion.

- A fear that working will cause the individual to become ineligible for cash or medical assistance.

The work group seeks to change this culture by assisting Michigan to become an employment-first state, supporting individuals with disabilities in overcoming the very real barriers in learning work-related skills and helping employers navigate the disjointed and complicated vocational rehabilitation system.²

A. Employment First

Michigan's Bureau of Services to Blind People, (BSBP) has embraced the Employment First paradigm. With 1.9% of Michigan's population being blind, 20% of BSBP's staff are blind or have low vision.

“Employment First” is a cultural paradigm where employment policies support individuals with disabilities as a true part of the workforce. Although there is not a universal definition of “Employment First,” this strategy generally consists of statutory, regulatory, and operational procedures and processes that identify employment in integrated, community-based businesses as a priority for governmental funding.

Employment First initiatives highlight the need to raise expectations and implement better practices around employment for individuals with disabilities, holding them to the same standards, responsibilities and sets of expectations as any working-age person. This cultural paradigm shift requires helping employers prepare to better support and

accommodate individuals with disabilities into integrated work settings.

The Employment First mindset has not been fully embraced in Michigan, though a few pilots and summits have discussed moving this concept forward and the Michigan Mental Health and Wellness Commission is hoping to have legislation introduced or an executive order issued to assist in the adoption of this cultural paradigm.

The work group recommends that governmental agencies and private organizations work with both the executive and legislative branches of government to pass legislation and draft appropriate regulations that will foster an Employment First culture in Michigan.

B. Overcoming barriers by providing support

It is critical that individuals with disabilities receive assistance and supports to help them on their path of gaining employment and independence.

² Much of this section could be implemented at the state level (e.g., in the form of legislative, rule-making, or policy changes). The work group recommends, however, that the Secretaries Innovation Group (SIG) members also inform our federal colleagues about these ideas because other states may find utility in them.

i. A collaborative Disability Determination Service (DDS)/Michigan Rehabilitation Services (MRS)/BSBP referral process

Currently, SSA Program Operations Manual System (POMS) and the Ticket to Work program requirements prevent DDS from making direct referrals to vocational rehabilitation service agencies.³ **Michigan believes that the development of a cooperative referral process between DDS and the vocational rehabilitation service agencies is absolutely crucial in assisting individuals with disabilities with entry or reentry into the workforce, before they become reliant on assistance.**

SSA has clarified that “DDS records and information used in the adjudication of applications for SSDI and SSI disabled or blind benefits, or in the determination of continued eligibility for disability benefits under a CDR is confidential and cannot be disclosed without a written *Authorization for Release of Information* signed by the beneficiary or the beneficiary’s authorized representative”. It appears DDS can share information with vocational agencies if the beneficiary agrees in writing to the release of information.

To move forward, MDHS, MRS and BSBP will work cooperatively to create a set of criteria to identify candidates who will benefit from MRS services and are expected to have successful rehabilitation outcomes.⁴ The team will create a written Authorization for Release of Information form which can be voluntarily signed by applicants who wish to take advantage of MRS’s services.

DHS will continue to measure MRS’s and BSBP’s return on investment relating to its disability employment programs and the number of vocational rehabilitation clients who have received services and are now ready for employment.

Michigan understands that efforts are being made at the federal congressional level to rescind the prohibition against referrals. Because the work group believes the ability to make referrals is crucial to individual success in entering or re-entering the workforce, it supports these efforts and asks SIG members to support the efforts as well.

ii. Employment support team

Once a client is receiving services, the work group recommends creation of an employment support team to develop person-centered employment plans. As appropriate to address the individual’s skills level and barriers, this team could include individuals experienced in: (1) motivational interviewing; (2) vocational rehabilitation; (3) employer mentoring; (4) human services; (5) intermediate school district transition; (6) medical and mental health supports; (7) benefit specialists; (8) centers for independent living; and (9) certified interpreters.

³ DI 55001.550 – Repeal of Referral Authority for Rehabilitation Services in States Where Ticket to Work Program is implemented. <https://secure.ssa.gov/apps10/poms.nsf/lnx/0455001500>,

⁴ Notably both entities are currently housed in MDHS. In other words, neither are governmental islands or silos completely independent of the other.

Using person-centered planning, the team will determine the medical stability and employment objectives of the individual and will provide a fast track to independence by encouraging informed choices and removing disincentives to return to work.

iii. Motivational interviewing

Motivational interviewing is an evidence-based communication tool used in vocational rehabilitation programming and has resulted in successful outcomes for individuals with disabilities. Job candidates are trained on becoming motivated, reliable and dependable.

The Michigan Behavioral Health and Developmental Disabilities Administration provides training in the use and continued support of this tool. Motivational interviewing specialists work at MRS, local community mental health services, Pathways to Potential locations, and other locations across Michigan that prepare individuals with disabilities for work.

The work group recommends that motivational interviewing be expanded in Michigan to assist more job candidates with disabilities prepare to enter or reenter the workforce.

iv. Collaboration with other state of Michigan departments and agencies

MDHS/MRS in collaboration with Michigan Department of Education, Michigan Economic Development Corporation, Michigan Department of Community Health (MDCH), Michigan Department of Civil Rights, Bureau of Services for Blind Persons (BSBP), Michigan Department of Licensing and Regulatory Affairs, Advisory Council on Deaf and Hard of Hearing, among other state agencies will align disability-related programs with workforce and economic development programs by linking the State's workforce and economic development agendas.

To achieve the necessary collaboration, the work group recommends the formation of an ad hoc committee to identify and address the needs of individuals with disabilities and those agencies and respective services that can be leveraged for the purpose of putting qualifying individuals back to work.

v. Support individuals with disabilities who wish to become entrepreneurs

Many individuals with disabilities, particularly those in rural Michigan areas where jobs are scarce, create opportunities for themselves through entrepreneurship. According to the United States Census Bureau, the individuals with disabilities are almost twice as likely to become self-employed as the general population – 14.7 percent compared to 8 percent.

MRS employs a dedicated small business consultant to assist promoting self-employment for persons with disabilities. Additionally, MRS partners with the U.S. Business Leadership Network and the Michigan Department of Civil Rights to assist in the disability-owned business certification process. MDHS and MRS will improve marketing of these services.

The work group recommends that a group of staff from MDHS, BSBP, DDS, MRS, and Plans to Achieve Self-Sufficiency (PASS) Specialists formulate self-employment models and a joint marketing campaign to help individuals with disabilities learn about and access these services.

BSBP also has programs that train blind individuals to become entrepreneurs. These programs will continue to grow to help blind individuals be successful in the workforce. The workgroup will review the programs to see if there are ways to make them most effective.

Business Assistance and Development Program

The Business Assistance and Development Program (BADP) is a new division within BSBP. Its mission and goal is to guide clients into areas of business assistance and development, with a training process focused on blind individuals learning business skills and developing knowledge of operating a business. The BADP will offer consulting services, development services, educational program, financial assistance and guidance for small and medium size businesses operated, managed or owned by entrepreneurs who are legally blind. The Division will provide customer related services with various stakeholders and associations to encourage the growth of legally blind entrepreneurs in the private sector. Services may include training modules for legally blind individuals operating in the food service industry. For example, the latest Blind Enterprise Program facility in Lansing is also a training center for BADP clients. BADP is currently developing a resource guide to assist consumers in identifying external resources for potential blind entrepreneurs.

C. Focus on skills assessment and training of workers to meet the needs of employers

The work group recognizes that even if an individual with disabilities wishes to enter or reenter the workforce, that person may need training in skill development, social skills and specific employment areas. The work group advocates for the incorporation of a “dual customer approach” into Michigan’s service delivery system that will work with both the individual and the employer to identify what training is needed and how to provide specific training or referrals for training.

i. Align and strengthen service delivery systems with the needs of employers

The work group recommends exploring the availability of employment-related services for employers as well as potential workers.

For example, community rehabilitation organizations employ a business service model that collaborates with employers to respond to their specific needs, such as recruitment, job coaching services and certifications, serving as an employer of record for externships and off-site training simulations.

The work group sees great value in extending this model to other Michigan employers. This extension can be accomplished without legislative changes.

ii. Local Expansion of the Michigan Career Technical Institute (MCTI)

The Michigan Career Technical Institute (MCTI) is a training facility operated by MRS and is located in west Michigan. The MCTI conducts vocational and technical training programs and provides the supportive services needed to prepare Michigan citizens with disabilities for competitive employment. The work group recommends that MDHS and MRS undertake a comprehensive assessment as to whether exporting MCTI's in-house expertise and programming across the state would result in more individuals being ready for employment, enhance local labor markets and increase the number of employers hiring individuals with disabilities.

D. The State of Michigan as a leader in employing individuals with disabilities

The State of Michigan should become a leader in assisting individuals with disabilities to find work. For example, MDHS and MRS are currently developing an internal, collaborative process for referring MRS work-ready recipients as applicants for open MDHS positions. Strategies may include:

- i. Designing a process to make MRS and BSBP staff aware of positions and internships that are listed on NEO-GOV. MRS/BSBP would then notify qualified individuals receiving rehabilitation and vocational services of vacancies and how to apply.
- ii. Reviewing and revising, as necessary, civil service exams relating to ensure full compliance with Americans with Disabilities Act (ADA).
- iii. Training state managers on disability etiquette, the various types of accommodations and best practices relating to the employment and retention of individuals with disabilities who are hired by the State.
- iv. Improving accommodations coordination within the Human Resources, including maintaining effective Coordinators who will respond to employee ADA requests, as well as sending referrals to the BSBP and MRS-Business Network Unit for vacancies and the need for accommodations.

II. Develop incentives for individuals with disabilities to enter or reenter the workforce

Current SSA regulations permit an individual with a disability receiving Social Security Disability Insurance (SSDI)⁵ to earn only a limited amount of income from employment –

⁵ Social Security Disability Insurance (SSDI) is a payroll-tax funded, federal government entitlement that is managed by the Social Security Administration (SSA) and is designed to partially replace income loss due to a determined disability. SSDI is

known as the Substantial Gainful Activity (SGA) amount. Once an individual exceeds this limit, (in 2014, \$1,800 for blind individuals and \$1,070 for those not deemed blind), that individual will lose SSDI benefits. Earning even one dollar over the SGA can make an individual entirely ineligible for assistance.⁶ Thus, an individual with a disability who relies on medical and cash assistance benefits may choose not to work for fear of losing benefits. The individual has little incentive to enter or return to the workforce.

The work group recommends certain reforms to address this issue:

A. Temporary disability award

Congress should permit an award of temporary disability benefits, such as an award for a set period of time, with the duration being related to various factors such as: the gravity of the disability, the likelihood of improvement, possible changes in the types of jobs available in the labor market⁷, and possible advances in assistive technology. Temporary awards recognize the possibility of physical recovery and scientific advances in assistive devices that mitigate functional loss and assist with entry or reentry into the workforce.

The availability of a temporary award encourages an individual with disabilities to seek training for new skills and types of employment that fit his or her medical circumstances. Allowing SSA and state agencies to award benefits that terminate at a definite time would dispel the notion that *all individual* beneficiaries are *permanently* unable to work and that disability awards continue indefinitely, despite the ability to enter or return to the workforce.

The “permanent disability” mindset is unequivocally detrimental to an individual’s self-esteem, self-sufficiency and mental and physical well-being and works against individuals having productive, fulfilling lives.

While this reform may increase the number of disability applications and administrative hearings seeking to extend benefits, the number of individuals who permanently live on disability assistance as their only source of income will decrease as individuals eventually return to work. Additionally, individuals whose temporary disability award expires may reapply and undergo a de novo eligibility determination.

The work group asks the Secretaries Innovation Group (SIG) members to: (1) underscore to Congress this recommendation as a workable method for limiting “lifetime” (i.e., permanent) awards; and (2) persuade Congress that temporary disability awards send a strong, yet fair,

an entitlement program, not a means-tested program; therefore the unearned income of individuals does not affect entitlement to SSDI. The loss of benefits due to earnings does not occur until after the beneficiaries have completed a nine-month trial work period, during which they can earn any amount without affecting their benefits.

⁶ Supplemental Security Income (SSI) is means-tested program that provides a stipend to eligible, low-income people who are either aged (65 or older), blind, or disabled. For SSI, the SGA amount is only counted for initial eligibility determination purposes, not for continued eligibility, unless the individual is eligible for and working under section 1619; then the individual must have earning at the SGA level. See page 12 for more information on section 1619.

⁷ Today many jobs are sedentary and technical and require less physical labor.

message that not only *can* people with disabilities work, but that entering or returning to the workforce is an *expectation* in all but extreme cases.

B. Dispelling the fear of losing financial and medical supports

It is important that persons with disabilities are educated about the amount they can earn and options available to improve their financial status. For example, one of the major barriers that individuals with disabilities, who receive SSI, must overcome is the limit on earnings for cash or medical assistance eligibility. SSI asset limits are currently set at \$2,000 for an individual and \$3,000 for a couple. While some assets, such as a recipient's home, defined benefit plans⁸ and one car, do not count against the asset limit, the SSI test generally counts other assets, including defined-contribution retirement accounts such as 401(k) and IRA accounts. These limits effectively discourage SSI recipients from working and gaining valuable experience that would likely lead to full-time employment with benefits and saving for the future. Without the ability to build financial reserves, participants in the SSI program are relegated to a life of poverty.

The following programs allow persons, including youth, with disabilities to earn and save without fear of losing their medical benefits. Attachment A lists work incentives and the amounts individuals currently can earn/save.

The work group urges Congress to review these programs to identify which work and which do not and to consolidate programs where possible for a streamlined, easier to navigate system. The work group also recommends the development of a clear and concise educational awareness program to clearly educate individuals on what they can earn/save and their work limitations.⁹

In the meantime the work group suggests a greater emphasis on supporting these programs:

i. Ticket to Work Investment Act of 1999, PL 106-170 (SSI and SSDI recipients)

Under the Ticket to Work Act, states can create Medicaid buy-in programs. Michigan's Medicaid buy-in program "Freedom to Work" allows eligible individuals with disabilities¹⁰ to save up to \$75,000 in personal savings and assets and unlimited IRS-recognized retirement accounts. Regrettably, these programs are not being used! The Centers for Medicare and Medicaid Services (CMMS) have not marketed the benefits of Medicaid buy-ins. In Michigan,

⁸ Defined benefit plans are excluded as an SSI asset, but defined contributions plans are not. Most workers today are offered defined contribution plans. Thus workers on SSI are discouraged from working.

⁹ One place the education materials could be posted is the DB101 website currently funded by the Michigan Department of Human Services (MDHS).

¹⁰ To be eligible an individual must meet the following requirements: 1. Found disabled under the SSI or SSDI programs or would be found disabled except for earnings in excess of the SGA. 2. Between ages of 16 and 65. 3. Has net countable unearned income level of not more than 100% of the federal poverty level and earned income of not more than 250% of the federal poverty level, 4. Assets meet the Medicare part D extra help low income subsidy and Medicare savings program asset limit. 5. Employed on a regular and continuing basis.

the Freedom to Work Medicaid buy-in program is only helping about 8,000 individuals.¹¹ Many more people could benefit from the program (e.g., SSDI recipients whose eligibility for benefits end due to financial factors). Thus, the work group recommends that the MDHS, the MDCH's Medical Services Administration LARA/BSBP and other appropriate agencies launch a consumer education initiative to extol the benefits of the Freedom to Work Medicaid buy-in program and how to become eligible for the program.

ii. Increase use of the “1619(b) Rule” (SSI recipients)

Many individuals and families with youth receiving SSI mistakenly believe that even \$1 in income will cause Medicaid benefits to cease. This myth needs to be dispelled. Under the “1619(b) rule,” (Social Security Act at 42 USC 1382h), individuals on SSI may keep their Medicaid coverage when their income is too high to receive any SSI cash benefits *if* they meet the other eligibility requirements and need Medicaid to continue to work.

In 2014, under the “1619(b) rule,” an eligible person in Michigan could keep Medicaid benefits *while earning up to \$34,260 per year in wage income.*

The work group recommends SSA do more to market the 1619(b) program through its work incentive planning and assistance grants that are active in most states.

iii. Individual Development Accounts (SSI and SSDI Recipients)

Individual Development Accounts (IDA) allow individuals receiving SSI to place some of their earned income into accounts that are matched from \$1 to \$8 by an IDA organization. The savings must be used for only three reasons: (1) entrepreneurship, (2) purchase of a home, (3) training/education.

If the IDA program meets the Health and Human Services guidelines, the funds are excluded from the SSI asset limit. There are 24 IDA organizations in Michigan, which can be located at http://cfed.org/programs/idas/directory_search/.

The work group recommends better promotion of IDAs through a clear and concise educational awareness program and through promoting the DB101 website.

iv. Achieving a Better Life Experience Act of 2013 (ABLE), S. 313/H.R.647

Congress is currently considering the Achieving a Better Life Experience (ABLE) legislation, which would amend the Internal Revenue Code of 1986 to allow individuals with disabilities to establish tax-exempt accounts to pay for “qualified disability expenses”. “Qualified disability expenses” includes expenses for education, including higher education expenses, a primary residence, transportation, obtaining and maintaining employment, health and wellness and

¹¹ Michigan Senate Bill 564 of 2012 seeks to expand eligibility for this program and is currently looking at a small change to lower the premium amount before implementation.

other personal support expenses. If passed, ABLE accounts would be disregarded when determining eligibility for Medicaid and other means-tested federal programs.

The work group requests that the SIG members support this bill and promote it across governmental agencies and other organizations.

v. *Promote partnerships for the successful use of Plans to Achieve Self-Support (PASS) (SSI recipients)*

PASS is a program that allows SSI-eligible adults and youth to develop a plan to save income by diverting some of their income (earned, unearned or both) into a designated account. It assists eligible individuals and youth to achieve employment goals and milestones by funding job creation, job coaching, clothing, school costs, business plan development and training classes. PASS can also be used to reduce income to the level in which the individual is eligible for SSI and other means-tested programs. The dollars set aside are not counted as income or an asset by SSA and for other agencies or programs (food assistance, HUD housing, etc.). PASS plans develop employment goals and help individuals work their way off the SSI program.

At present, fewer than 60 PASS plans are active in Michigan, although thousands of individuals qualify. While PASS plans can be difficult for individuals to understand and are challenging to have approved, persons with a PASS plan are more likely to find employment and forego SSI. Additionally, if a person with a previously open case with MRS or BSBP stops receiving SSI for nine consecutive months, MRS/BSBP will capture a cost reimbursement from SSA of about \$8,500. If Michigan has 30 individuals who complete their PASS plans and remain employed for nine months, it would gain an additional \$250,000 for vocational rehabilitation.

The work group recommends that the PASS program be better marketed in Michigan and PASS information be incorporated into SSA work incentive outreach programs. Further, MRS staff should be trained to promote PASS plans (specifically those with individualized employment goals).¹² Finally, the work group urges SSA to assign more staff to the PASS program, since only two staff members currently review plans in Michigan.

vi. *Modernize the Vocational Regulation Charts and Dictionary of Occupational Titles*

The Vocational Regulation Charts, otherwise known as the social security grids, need updating to reflect the present-day workplace and changes in age- and medical-related factors. While this endeavor will be demanding, the current grids and the Dictionary of Occupational Titles reflect an antiquated labor market geared to a manual labor workforce, rather than the modern labor landscape, which includes a more sedentary and technological job market that increasingly does not require physical labor. A pressing need remains to align the current grids with the current labor market.

¹² It would also be useful to add a PASS calculator to the current www.mi.db101.org website, if cost is not prohibitive.

Moreover, 42 USC 416(l)(1)(C) thru (E) defines the retirement age as 66 – 67 for individuals who will reach age 62 after December 31, 2004. This is an indication that individuals are expected to work longer. The social security grids should likewise be increased. For example, under the current grids, a person is considered of “advanced age” at 55 years old. Advances in modern medicine and the growth of the sedentary and technological job market justifies increasing the “advanced age” classification to at least 60 years old.

The work group was advised that SSA has an interagency agreement with the Bureau of Labor Statistics (BLS) to test the feasibility of using the National Compensation Survey platform to collect updated occupational information similar to what adjudicators currently use. In FY 2013, the BLS collected information about the physical, skill and mental/cognitive requirements of occupations and environmental factors to which workers are exposed. While the system has not yet been fully tested, it is expected that this effort will be valuable to revising the current Dictionary of Occupational Titles. The work group strongly urges SIG members to present these recommendations to the appropriate congressional leaders.

C. Increased earnings limit (SSDI Recipients)

The work group also recommends that SSDI beneficiaries be permitted to earn greater income than the SGA amount. Doing so will directly encourage the beneficiaries to enter or return to the workforce. This can be accomplished by allowing beneficiaries to take a \$1 reduction in disability benefits for every \$2 earned above a specific amount determined by Congress, such as the established SGA amount.¹³ This 2-to-1 methodology is currently used for SSI and old age security benefits.

While adoption of this reform would initially require an outlay of taxpayer dollars, it would also encourage rehabilitation, retraining and the ultimate entry or reentry into the workforce, where the individual will then begin to earn wages and not rely on assistance. It will also gradually reduce the dependence on disability assistance. The initial negative fiscal impact will be less than it appears because fewer than 1 percent of beneficiaries receiving disability benefits actually return to work.

The work group seeks SIG members’ assistance in moving this reform to members of the U.S. House Ways and Means Committee for their consideration.

III. Assist the business community (employers) in hiring and retaining Individuals with disabilities

The business community wants Michigan to assist employers by providing the expertise and the resources necessary to navigate the complex vocational rehabilitation and social security

¹³ SSA is piloting a similar idea in greater Southeast Michigan; the SSA Benefits Offset National Demonstration pilot was implemented in 2009. It will be evaluated by SSA in 2016. This pilot will show whether more persons with disabilities join and continue in the workforce because of increased income limits.

systems so they can recruit, hire and retain qualified employees with disabilities and remove barriers to employment. Currently, nearly 60,000 jobs have not been filled in Michigan, and more than 700,000 working-age Michigan citizens with disabilities are unemployed. An effective partnership among employers, the state's vocational rehabilitation programs and the network of associated community organizations is not new. Yet employers are increasingly recognizing the value and rewards of diversifying their workforce to include individuals with disabilities. Others are responding to federal contract requirements to hire disabled individuals. For these reasons, the work group acknowledges a pressing critical need to expand existing partnerships and develop a formalized Michigan network and infrastructure to support employers and qualified jobseekers with disabilities.

A. The use of employment navigators

Employers state they need help navigating the current system to hire more qualified workers with disabilities. Questions they commonly ask include:

- How do we find qualified workers with disabilities?
- Do they have the skills and training that we need?
- What are the business needs?
- What will it cost?

Employers lacking knowledge about providing accommodations or partnering with rehabilitation organizations may need help to find, hire and retain qualified employees with disabilities and provide them with the necessary accommodations.

The work group recommends the use of employment navigators to assist employers to negotiate the disability system and work requirements. It is anticipated that navigators could assist Michigan businesses in hiring significant number of jobseekers with disabilities in a one-year period. To that end, it is necessary to advertise the navigation services and create navigation tools, resource guides and service provider directories. Here are some examples of these tools and resources:

i. MRS and the MRS-Business Network Unit

The MRS and the MRS-Business Network Unit employ business service representatives and occupational therapists with expertise in:

- Helping businesses identify their needs and develop their employment profiles.
- Providing technical assistance and training to employers to increase employment opportunities for individuals with disabilities and facilitate retention and promotional opportunities.
- Providing customized employment and job readiness services to individuals with disabilities seeking employment.

Referrals to the MRS-Business Network Unit should be made for assistance with:

- Job retention on cases involving reasonable accommodations and accessibility issues under the ADA.
- Return to work evaluations or site evaluations for MDHS employees who were on medical leave and are returning to work.
- One-on-one occupational therapist or rehabilitation specialist case consultation.
- Assistive technology and accessibility training or consultation in partnership with Centers for Independent Living.

ii. Point-of-contact networks

The work group recommends that MRS develop a formal, single point-of-contact model in local communities where employers can be connected in their geographic area. This contact will act as a liaison between businesses and governmental agencies.

The work group hopes to develop a pilot project for rehabilitation employment specialists to assist employers “on-site” to recruit, prescreen, coach, and mentor potential employees with disabilities. Points of contact can work with multiple businesses at the same time, an approach known as sector strategies.

Employer Resource Networks

The SOURCE is a collaborative effort involving private industry, government agencies and not-for-profits that leverages resources for communities and employees to create sustainable employment utilizing employee supports, including on-site MDHS caseworkers, to solve various employment and home-related problems and to manage family cases. The SOURCE also offers its members classes in finances, computer training, English as a second language, home ownership and maintenance.

iii. Employer resource networks (ERNs)

Employer resource networks (ERNs) are partnerships of companies in a geographic area that aggregate their needs around employee training and assistance, with a vision of continuous improvement. ERNs leverage resources that each business could not access alone. They can hire retention specialists to work with employees (including employees with disabilities) at their place of employment or at a convenient nearby site before or after work. Joining an ERN may also help small businesses determine how to pay for accommodations.

ERNs use process improvement models and root cause analysis to drive continuous workforce improvement and to address employee retention issues, linking skill development and advancement pathways with existing community resources offered by partners (including local technical colleges and workforce development systems).

Michigan currently has four ERNs. Expanding ERNs will help more employers hire and retain staff and ensure that more employees overcome barriers to remain employed.

iv. Employment Networks through Ticket to Work

Through the Ticket to Work program an individual, partnership (public or private) or consortium of organizations can apply to become an employment network and provide employment services, vocational rehabilitation services or other services and supports to individuals with disabilities. The individual with a ticket to work enters an agreement with an employment network to receive services. Employment networks select the specific services they want to provide and in which geographical area they are willing to work. The employment network is paid based on outcomes when the individual achieves certain employment-related milestones. Michigan has 47 employment networks.¹⁴

These employment network programs should be promoted to increase the number of employers who have joined an employment network and to increase the number of individuals with disabilities using them.

v. Creation of resource website for employers seeking to diversify their workforce.

MRS will update its website to make information on helping employers seeking to diversify their workforce more prevalent. Links to the Disability Network, the SSA and other helpful resources will be provided and updated. Additionally, Michigan Works! Agencies will be contacted to see if they can also provide information on their websites.

vi. Talent Acquisition Portal

The Talent Acquisition Portal provides online access to a national pool of qualified candidates with disabilities. This system is owned by all 80 vocational rehabilitation agencies in response to the new 503 rules for federal contractors and subcontractors that took effect March 24, 2014. MRS will promote the talent acquisition portal on its website and in its outreach with businesses.¹⁵

IV. Develop and provide needed support systems to youth with disabilities to transition into the workforce

In 2011-2012, there were 112,872 Michigan youth¹⁶ with disabilities,¹⁷ including 43,238 youth receiving SSI.¹⁸ Many of the youth with disabilities could succeed in vocational pursuits, but lack

¹⁴

http://www.choosework.net/enreport/jsp/ensearchResult.jsp?state=MI&zipcode=&submit_value=0&state_name=&zipcode_name=&pagenumber=1

¹⁵ <https://tapability.org/>

¹⁶ "Youth with disabilities" for this report are youth in high school, age 16 and older, unless otherwise noted.

¹⁷ 2009-2011, Census Report – Civilian Non-Institutionalized Population.

¹⁸ Social Security Administration (SSA) Master Benefit Record and Supplemental Security Record, December 2012.

the necessary support to complete their education and transition into the workplace.¹⁹ These youth often do not obtain gainful employment for many reasons, including:

- The SSA benefits system is complicated and difficult to understand, in particular the impact of working while receiving Social Security benefits.
- Use by families of a child's SSI disability benefits as de facto welfare benefits. Families relying on their children's benefits for living expenses have no incentive for their children to become employed, if they might lose financial and medical benefits.
- Families are afraid their loved one will be harmed while at work.

Maximizing the ability of youth with disabilities to participate fully in education and gainful employment is an achievable goal. MRS and BSBP already work with all Michigan high schools to assist youth and their families in transitioning to full inclusion in the community including the workplace. The vocation rehabilitation agencies and the Michigan Department of Special Education will be consulted to assist in the implementation of these recommendations. Additional recommendations include:

A. Increase family engagement and support for a child's education and employment opportunities

A crucial factor for the success of a youth with disabilities is family support. Family engagement in the youth's school and transition to work may help the child gain confidence to move forward on a successful work path.

The work group learned that some families do not encourage their disabled child(ren) to work toward self-sufficiency because they fear the child will lose Medicaid or disability assistance or may be harmed while at work. Families should be educated on why and how they should give their children opportunities to learn skills necessary to work and to be mentored by their peers.

Educating families starts with developing materials and public service messages about the disability system, including their children's potential and the benefits of work on building their children's self-esteem.

B. Team approach – cross-agency employment planning team

The work group's goal of moving a youth into self-sufficiency may require planning by a team that includes the youth and their parents/caregivers to ensure necessary supports are in place.

The work group envisions a cross-agency employment planning team consisting of the student, parents/caregivers, education staff, human services staff, employers, vocational rehabilitation agencies including MRS and BSBP, Centers for Independent Living, certified interpreters and other essential supportive individuals. This team would develop an employment plan to identify the student's interests, aptitudes, abilities, priorities, and employment goals. The team would also assist

¹⁹ The number of youth with disabilities who are working has not been tracked. Determining how to collect this data is essential to move forward.

the family in understanding the youth's ability to earn income by explaining the different available programs. The team's plan may include a referral to MRS or to a variety of learn-to-work programs such as PASS or a work transition program (described below). The team would also help families understand savings programs such as Ticket to Work, Student Earned Income Exclusion, 1619(b) plans and Individual Development Accounts.

The work group will collaborate with the Michigan Department of Special Education to learn what planning, programs and services they provide to students, in order to maximize services and avoid duplication²⁰. Additional discussion and research will be conducted to develop a viable plan to achieve this goal.

i. Juvenile justice youth re-entry program

Juvenile justice youth with disabilities who have been in a juvenile justice facility may be released with few or no resources or family ties. The work group recommends that this population have the benefit of a cross-agency employment planning team similar to what is described above to begin planning either prior to sentencing or six months before the youth's release.²¹ MDHS can fund this initiative through existing child welfare and juvenile justice programs.

C. Paid work experience or work transition program during high school.

Studies demonstrate that students with disabilities who worked for one full year during high school were five times more likely to be engaged in post-school employment and education.²² Similarly, students who participated in a school/work transition program during the last two years of high school were also more likely to be employed post-school.²³ Accordingly, the work group recommends that youth with disabilities have at least one paid work experience or participate in a work transition program for youth with disabilities while in high school.

To accomplish this goal, employers must be recruited to provide business opportunities or paid internships for youth with disabilities. Businesses may choose to offer internships for youth with disabilities after observing the successes of other businesses with their interns. Incentives for

²⁰ For example, Michigan Department of Special Education operates the Michigan Transition Outcomes Project, which facilitates the development of effective systems that support students to achieve positive postsecondary outcomes. These systems contain measurable student focused planning, student development activities, and continuous family and community involvement to ensure all students are prepared for postsecondary education, employment, and independent living.

²¹ Recently, Governor Snyder issued Executive Order 2014-7 which expands the scope of the Mental Health Diversion Council to include juvenile issues. MDHS will have a representative on this Council. This will help address mental health barriers for juvenile justice youth who are returning to the community.

²² Bullis, M, Davis, C., Bull, B., and Johnson B., *Transition achievement among young adults with deafness: What variables relate to success?* (Rehabilitation Counseling Bulletin, 39, pp 130-150, 1995).

²³ Benz, M., Yovanoff, P., and Doren, B., *School-to-work components that predict post-school success for students with and without disabilities.* (Exceptional Children, 63(2), pp 155-165, 1997).

participating businesses might include: wage reimbursement, wrap-around business supports and ancillary support services.²⁴

The work group fully supports increasing the number of students who have internship or work experiences during high school. The implementation team will reach out to local chambers of commerce and the business community to identify businesses that will be willing to start an internship program for local students with disabilities.

D. Collaboration among vocational rehabilitation agencies, colleges and universities to target career services to students with disabilities

MRS is currently partnering with Michigan State University to develop a match/funding agreement to place a vocational rehabilitation counselor on campus who will provide wrap-around services to eligible students with disabilities. Western Michigan University and Eastern Michigan University have also expressed strong interest in this model. The work group recommends that MRS expand these agreements with other Michigan colleges and universities and develop metrics to determine the success of this program. BSBP also has an excellent working relationship with colleges and universities. Additionally, the Workforce Recruitment Program should be better utilized and promoted. The Workforce Recruitment Program for College Students with Disabilities (WRP) is a recruitment and referral program that connects federal and private sector employers nationwide with highly motivated college students and recent graduates with disabilities who are eager to prove their abilities in the workplace through summer or permanent jobs.

The U.S. Department of Labor's Office of Disability Employment Policy (ODEP) and the U.S. Department of Defense's Office of Diversity Management & Equal Opportunity (ODMEO) manage the program, which continues to be successful with the participation of many other federal agencies and sub-agencies. Since the program's expansion in 1995, over 6,000 students and recent graduates nationwide have received temporary and permanent employment opportunities through the Workforce Recruitment Program.

i. Student Earned Income Exclusion

Through the Student Earned Income Exclusion, students with disabilities under age 22 may earn \$1,750 per month or up to \$7,060 per year while regularly attending school, college or training for employment without reducing their SSI check. After the maximum is reached, the SSI cash benefit is reduced \$1 for every \$2 earned.

This program is underutilized. MDHS, MRS, BSBP and SSA will work with schools and colleges to better advertise this program to students with disabilities and their families.

E. Communicating a strong message about how youth with disabilities can succeed.

Youth are often bombarded with negative messages and suffer teasing in school. Youth with disabilities often receive these negative messages, which may affect their courage and self-esteem.

²⁴ Some businesses may be precluded from offering work experiences because of union contracts.

Youth need positive messages and supports that will help them focus on their strengths and learn how they can benefit themselves and the community.

i. Peer-to-peer mentoring

The purpose of peer-to-peer mentoring programs is to provide increased opportunities for students with disabilities to access the general education curriculum and interact with general education students. Peer-mediated approaches have long been used to improve the learning outcomes and social interactions of students with and without disabilities.²⁵ Fortunately, Michigan has comprehensive, well-formulated peer-to-peer support models, such as the LINKS Peer-to-Peer program, which has been promoted and supported by educators, parents and students for many years and Project Unify²⁶ in which students across Michigan use sports and education programs to change school culture while nurturing respect, dignity, advocacy and friendships between those with and without intellectual disabilities. Additionally, peer support is a core service for the Centers for Independent Living.

The work group recommends focused continuation of Peer-to-Peer programs.

ii. Reducing stigma

The Michigan Mental Health and Wellness Commission 2013 Report recommends that the State Legislature take action to reduce stigma against individuals with mental health issues and those with developmental disabilities by partnering with advocacy organizations and community mental health service programs to implement stigma reduction campaigns that will be promoted in various traditional and social media outlets across the state. These stigma campaigns should have a focus on personal stories and peer-to-peer support with an outreach toward their respective communities.²⁷ The work group recommends support for legislative action and that MDHS partner with traditional and social media outlets to provide messages that decrease stigma by highlighting personal success stories and opportunities for individuals with disabilities.

F. Promote partnerships for the successful use of Plans to Achieve Self-Support (PASS)

Finally, as explained above, PASS is a little-used program in Michigan that allows SSI-eligible adults and youth to set aside income by diverting some of their SSI payments into a designated account. Youth should be encouraged to develop PASS plans to help them to achieve their employment goals and milestones.

V. Improve the quality and uniformity of administrative law judge decisions

The current federal administrative hearing process for determining disability is one-sided and lacks adequate administrative review.

²⁵ Carter, E.W. and Kennedy, C.H., *Promoting Access to the General Curriculum Using Peer Support Strategies* (Research and Practice for Persons with Severe Disabilities, Vol 31, No 4, pp 284-292, 2006).

²⁶ Project Unify is supported by Governor Snyder and has 50 projects in Michigan that served 2,078 students and 43,450 students were exposed to the positive messages during the 2012 and 2013 school year.

²⁷ Mental Health and Wellness Commission Report released January 21, 2014.

A. Legal representation of the government in the administrative hearing process

The work group believes that advocates, preferably attorneys, should represent the government's interest in all disability hearings before the administrative law judges. Disability hearings have become increasingly one-sided, (i.e., where individuals seeking a disability determination are often represented by an attorney, while the government is not). Many individuals are found permanently disabled only because they had legal representation and there was no opportunity to challenge their claims.

The integrity of disability awards would be improved by allowing both the claimant and the government to fully present facts that prove/disprove disability. Reducing inappropriate awards would also provide savings to taxpayers.

As another alternative, the work group strongly urges the creation of a hearing and review board to review disability awards during the appeal period for legal and factual soundness.²⁸ This review process would apply to all awards to ensure they are sufficiently grounded in law or fact. If the award is not sound, the government could appeal the decision.

By implementing a hearings and review board, the quality of analysis and decision-making by administrative law judges would improve.

The work group requests the SIG members support this recommendation and contact appropriate congressional leaders for their consideration.

A third alternative is to add Administrative Law Judges to Section 221 of the Social Security Act, which requires SSA perform pre-effectuation reviews of 50 percent of the state disability determination allowances:

In carrying out the provisions of paragraph (2) with respect to the review of determinations made by state agencies and **administrative law judges** pursuant to this section that individuals are under disability...

B. Closing the record at the administrative hearing

In disability determination cases on appeal, administrative law judges often allow claimants to provide new records demonstrating disability. This practice significantly increases the number of cases that return on remand, causes substantial delays and allows claimants another "bite of the apple," when, in most instances, the same information could have been submitted, but was not. It is recommended that the SSA instruct its administrative law judges to close the record unless the claimant can demonstrate good cause why the information could not have been presented at the time of the administrative hearing.

The work group requests that the SIG members support this recommendation and approach appropriate congressional leaders for their consideration.

²⁸ This process could either review all awards to determine which should be appealed or a sample of awards to determine whether certain judges are consistently making awards not based on fact/policy.

VI. Unemployment compensation and social security disability benefits

Finally, the work group recommends that SSA offset SSDI if the recipient collected state unemployment compensation benefits and SSDI benefits for the same time period. To receive unemployment compensation benefits, a claimant must represent that he is *able and available* for work.²⁹ To receive SSDI benefits, a claimant must assert that he is *unable* to work. The claimant should not be permitted to receive both unemployment compensation and disability benefits for the same time period. This is the epitome of double dipping. There are currently three suggestions before Congress to address this issue.

1. The President's FY2015 budget would provide for a dollar-for-dollar decrease for any month in which a disabled-worker beneficiary receives unemployment insurance payments. The dollar-for-dollar decrease is anticipated to reduce SSDI payments \$2.57 billion and a decrease in unemployment insurance payments of \$0.88 billion between 2015 and 2024.³⁰
2. Under H.R. 1502 any month that an individual receives UIA will not count as a month of disability. In determining continuation of benefits, any month that a claimant receives both UIA and SSDI will count as a month in which the claimant either engaged in substantial gainful activity or as part of the trial work period. This proposal is estimated to reduce SSDI by \$8.0 billion and unemployment insurance payments of \$2.3 billion for 2014 through 2023.³¹
3. S. 1099 would withhold SSDI benefits for any month in which a disabled worker beneficiary receives unemployment insurance payments. It is estimated to reduce SSDI payments by \$2.9 billion and unemployment insurance payments by \$2.0 billion between 2014 and 2023.³²

The work group supports all three of these proposals but most strongly supports H.R. 1502 as it provides greater savings for Social Security. The work group requests that the SIG members support this recommendation and approach the appropriate congressional leaders for their consideration.

VII. Summation

"Better Off Working" is a mantra worth pursuing. Public and private entities must work to reform the current disability system, thereby reducing the need or desire for permanent dependency on disability benefits. Maximizing existing resources, improving the health and well-being of individuals with disabilities through work promotion, changing the "permanent

²⁹ MCL 421.28(1)(c). Middle Class Tax Relief and Job Creation Act of 2012. Title II, Section 2101(a)(12)

³⁰ Estimate provided by Social Security Office of the Chief Actuary in a letter to the Hon. Sylvia Mathews Burwell on March 4, 2014.

³¹ Estimate provided by Social Security Office of the Chief Actuary in a letter to the Hon. Sam Johnson on January 7, 2014.

³² Estimate provided by Social Security Office of the Chief Actuary in a letter to the Hon. Tom Coburn in a letter dated January 7, 2014.

disability” mindset, and de-emphasizing disability benefits as a de facto public assistance program are all noble and achievable goals.

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Advisory Council on Deaf and Hard of Hearing – reviewed and provided comments
Michigan Department of Education – reviewed and provided comments

List of Abbreviations

ABLE	Achieving A Better Life Experience
BLS	Bureau of Labor Statistics
BSBP	Bureau of Services for Blind Persons
CMMS	Centers for Medicare and Medicaid
DDS	Disability Determination Services
ERN	Employment Resource Network
IDA	Individual Development Accounts
MCTI	Michigan Career Technical Institute
MDCH	Michigan Department of Community Health
MDHS	Michigan Department of Human Services
MRS	Michigan Rehabilitation Services
NEO-GOV	State of Michigan Employment Application and Web site
PASS	Plans to Achieve Self-Sufficiency
POMS	SSA Programs Operations Manual Systems
SGA	Substantial Gainful Activity
SIG	Secretaries Innovation Group
SSDI	Social Security Disability Insurance
SSI	Supplemental Security Insurance
UIA	Unemployment Insurance Agency

Attachment A

WORK INCENTIVES TARGETED TO THOSE ALREADY RECEIVING
DISABILITY BENEFITS – CURRENT LAW.

Work incentive	SSDI	SSI	Both SSDI and SSI
Continued eligibility during transitional attempts to work	Trial Work Period: Full benefits regardless of how high earnings might be for up to 9 months over a rolling 60 month period.	Benefits not subject to termination after a trial work period under certain conditions (Section 1619(b))	Unsuccessful work attempt under 6 months does not count for SGA under certain circumstances.
	Extended Work Period: Continued eligibility after the 9 month trial period for an additional 36 months with paid benefits for every month earnings do not exceed SGA.		Special conditions in which earnings representing only the discounted value of work are used in calculating SGA.
Earned income exclusion		Excludes 50% of earned income in benefit determination.	
Income and resource exemptions relating to work		Diverting income (earned and unearned) into a designated account to fund job creation, job coaching, clothing, school costs, business plan development and training classes. (PASS)	
Special services to help obtain employment			Ticket to Work
Continuation of cash benefits after medical improvement			Applies if VR or similar services will increase likelihood of case closure due to employment (Section 301)
Expedited reinstatement		Can restart cash payment or Medicaid within 12 months without a new application for reason other than earned income.	Applies if case closed within past 5 years for earnings; provides up to 6 months of temporary benefits while medical review for the reinstatement is underway.
Extended medical benefits	Continued Medicare coverage for 93 months after the end of 9 months trial work period. Also Medicare coverage with buy-in after premium free period ends; states have certain premium	Medicaid continues after a return to work even if over income cutoff but under state threshold of \$34,260 in Michigan in 2014 (Section 1619(b)). Also cash benefits continue for up to 2 months if working	

	subsidies for low income beneficiaries.	under section 1619 while in a Medicaid or public medical facility for up to 2 months.	
Student earned income exclusion (SEIE)		Excludes \$1750 of earned income per month up to \$7060 if in school.	
Work incentive seminars			Free internet based information about back to work benefits.