

Work incentives planning and assistance: Assisting beneficiaries to obtain employment and reduce dependence on SSA benefits

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On May 19, 2009, Dr. John Kregel provided testimony to the Social Security Subcommittee of the Ways and Means Committee of the U.S. House of Representatives on ways to improve the Social Security Administration's employment and return to work programs. His testimony is provided below in its entirety.

1. Introduction

Mr. Chairman, thank you very much for this opportunity. I will focus my comments today on SSA's employment programs, particularly the Work Incentives Planning and Assistance (WIPA) program. The WIPA program is an integral part of SSA strategy to promote employment among SSA beneficiaries, reduce dependence on SSI and SSDI cash benefits, reduce the number of burdensome overpayments and other post entitlement problems experienced by beneficiaries engaged in employment, and decrease trust fund and general fund expenditures by reducing cash payments to beneficiaries. Authorized by Section 121 of the Ticket to Work and Work Incentive Improvement Act of 1999, 104 WIPA projects are providing services to SSA beneficiaries in all 50 states and territories. Collectively, the 104 projects employ over 400 Community Work Incentive Coordinators (CWICs), many of whom are themselves individuals with disabilities, and have served over 350,000 individuals since the program's inception in 2000.

The mission of the WIPA program is to provide timely and accurate information to beneficiaries on SSA's work incentives and other federal efforts to remove regulatory and programmatic barriers to employment for persons with disabilities. To achieve this purpose, the program uses a highly skilled and rigorously trained cadre of CWICs to provide individual counseling to beneficiaries seeking employment and intensive follow-up services to ensure that the beneficiaries are using the work incentives appropriately, that they have been connected to employment service programs in their community, and that they are communicating their work activities to the Social Security Administration. CWICs in local WIPA programs work with individual beneficiaries to explain the myriad of regulations, provisions, work incentives and special programs that complicate an individual's decision to enter or reenter the workforce.

The questions posed to benefits specialists by beneficiaries are basic and straightforward. What will happen to my benefit check if I return to work? I want to start my own business – is this possible if I receive SSA benefits? I am currently working and got a letter from SSA indicating that I have been overpaid and have to pay back money – can you help me? I want to start a new career – where should I begin? As simple and basic

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as these questions are, their answers are often complex and highly individualized. Even more frustrating to beneficiaries is the overwhelming amount of confusing and inconsistent information they often receive from SSA field offices, Employment Networks, Vocational Rehabilitation and other agencies involved in the employment process. This sea of misinformation makes employment seem a perilous and terrifying undertaking and lessens the resolve of many beneficiaries to pursue their career goals.

The WIPA program is designed to fill this information void by providing beneficiaries access to complete, individualized information from a trained professional in a confidential setting apart from SSA. SSA field office staffs, overwhelmed with processing current disability claims, are simply unable to provide this level of intensive services. Armed with an understanding of the impact of employment on their benefits, beneficiaries can confidently pursue employment options, maintain health care coverage, and obtain necessary employment supports and services. With the help of benefits planning and assistance, beneficiaries can take charge of their own careers without the constant worry that the application of an unknown rule or a mistake by a federal caseworker will jeopardize their ability to pay for their basic needs or treat their health conditions.

It's about trust. If beneficiaries are to accept personal responsibility for their careers and their economic self-sufficiency, they have to be able to trust the information they receive and the service providers that assist them. If beneficiaries are told that employment will affect their benefits in a certain manner, they have to be able to trust and act on that information. If individuals with diabetes, epilepsy or a psychiatric disability are told that they will still have access to health care coverage even though they no longer receive a cash benefit from SSA, they must be able to depend on this information, as erroneous information may literally put them in a potentially life-threatening situation. If an individual complies with all SSA regulations and reporting requirements and SSA fails to accurately apply the reported information to the individual's case, the resulting overpayment can have a catastrophic and disheartening effect on even the most courageous and patient beneficiary. Viewed from this perspective, the WIPA program is the most basic of all employment services. For example:

- Staff from the Center for Independent Living of Middle Tennessee report talking to many individuals who have received conflicting and often

inaccurate information from the Vocational Rehabilitation agency, SSA field offices, and Employment Networks. This confusion increases fear and causes concerns among beneficiaries bravely attempting to return to work.

- In eastern Pennsylvania, WIPA project staff members describe a number of consumers who have stopped working while on benefits because of substantial overpayment situations, many of which occur even though the beneficiaries have maintained meticulous earnings records and are accurately following SSA wage reporting procedures.
- In Kentucky, staff from the Center for Accessible Living report that beneficiaries have responded positively to the simple fact that accommodations such as sign language interpreters are provided by the WIPA project upon requests. Many beneficiaries have noted they have not been provided accommodations at the SSA office even when requested.
- In California, most beneficiaries contacting the Familia Unida WIPA project have language and cultural barriers that affect their communication with SSA. Most of these individuals are afraid to call the SSA office and are not clear about the information they have received.

This testimony contains four sections. The first section discusses the need for WIPA services and summarizes current program outcomes. The second section describes the job of the CWICs and illustrates their role in promoting employment among SSA beneficiaries. The third section summarizes some of the major accomplishments of the WIPA initiative. Finally, the fourth section recommends additional resources to maintain and enhance the program.

2. The need for WIPA services

The WIPA program is a large, SSA operated employment support program, which has provided assistance to over 300,000 SSA beneficiaries who are currently employed or interested in pursuing employment since its inception in 2000. The WIPA program is not focused on helping individuals remain on benefits, express complaints or concerns to SSA, or solve every beneficiary concern. It has a clear, concise mission – assist the over one million current beneficiaries who desire to work to obtain employment and pursue their careers, ultimately working their way off SSA cash payments.

The overwhelming need for the program is clearly documented in the results of the National Beneficiary Survey (NBS), conducted by Mathematica Policy Research under contract from SSA. The NBS is the most methodologically rigorous and precise estimate of the employment aspirations and activities of SSA beneficiaries currently available to policymakers. The most recent administration of the survey, in 2006, found that 44% of beneficiaries reported that their personal goals include getting a job, getting a better job, or moving up in a job and/or that they see themselves working for pay sometime in the next five years.

The survey discovered that not only are SSA beneficiaries setting employment goals for themselves, they are also taking direct, concrete actions to achieve these goals. Many beneficiaries had engaged in employment, vocational training, or job-seeking activities over the past year. In real terms, the NBS found two million SSA beneficiaries who are working or actively seeking work. These individuals should be the focus of SSA's employment and return to work efforts. In short, the NBS reaffirms what beneficiaries and advocates have repeatedly articulated to Congress over the recent past – that they desire lives of productivity over idleness, self-sufficiency over poverty, independence over dependence, and that they can achieve these goals if provided the right services and supports.

Estimating the Need for WIPA Services – The NBS results described above indicated that large numbers of beneficiaries are currently employed or pursuing employment. Even if the reported expectations tend to be overly optimistic, the findings imply that large numbers of beneficiaries (over four million) are interested in employment and they might benefit from employment services or policies designed to promote employment. Of those individuals, 52% had engaged in recent work activities (worked in previous year, working or actively seeking work at interview, participated in vocational training). Extrapolating these figures to individual states or localities, it can be conservatively estimated that *approximately 20% of all working age SSA beneficiaries could benefit from WIPA services, either immediately or in the near future.*

WIPA Participant Characteristics – WIPA projects serve a group of individuals who are seriously pursuing careers. Overwhelmingly, beneficiaries served are between the ages of 22 and 59. Youth were not significantly represented among WIPA participants, with less than 5% of beneficiaries reported to be under the age of 22. Males (49.8%) and females (50.2%) were equally represented among total participants. The pro-

gram serves individuals with a broad variety of both physical and mental disabilities throughout its five-year implementation. The most commonly indicated disabilities were mental and emotional disorders and system diseases, which jointly accounted for over half of WIPA participants.

Nearly 90% of all individuals who contact a WIPA project are either employed, actively seeking employment, or interested in obtaining employment in the near future. Less than 1% of individuals contacting WIPAs are in the process of terminating employment or reducing their work hours. The services and supports provided by WIPA programs to assist beneficiaries to achieve these goals will be illustrated later in this testimony.

2.1. The role of CWICs in the WIPA program

The foundation of the WIPA program is the national cadre of highly skilled and rigorously trained Community Work Incentive Coordinators (CWICs). CWICs complete a demanding preparation and certification program and participate in an intensive program of ongoing technical assistance and training. These dedicated professionals are using their knowledge, skill, and personal experience to assist other persons with disabilities to navigate the maze of SSA work incentives and regulations to obtain employment and maximize their economic self-sufficiency. CWICs are not peer counselors or trained volunteers. They are a group of highly trained professionals dealing with extremely technical information in a way that makes sense to beneficiaries and allows them to pursue their career goals.

All WIPA project personnel (CWICs) providing direct services to beneficiaries are required to successfully complete a highly challenging training and certification process. The CWIC Initial Certification process consists of four components. The amounts of time CWICs devote to these components are summarized below.

Component 1 – First, CWICs participate in a 32-hour Face-to-Face Training Class. The training class addresses each of the 20 training competencies found in the National Training Curriculum (NTC). Sixteen Initial Training classes have been conducted over the past 16 months.

Component 2 – CWICs engage in extensive self-study activities to prepare for and complete the required CWIC certification assessments. Self-study activities include review of the National Training Curriculum, review of other resource documents, and study calls

moderated by the NTC trainers. Data reported by CWICs completing the certification process revealed that on average they spent approximately 30 hours completing the self-study and activities.

Component 3 – CWICs are required to complete six competency-based assessments that address each of the major training modules of the National Training Curriculum. Assessments are conducted entirely online using the Blackboard Learning System and consist of objective test items, essay responses, and case studies. CWICs reported spending approximately 20 hours completing the six assessments. Approximately 30% of all initially certified CWICs receive additional support from NTC staff during the early stages of service delivery. Based on a recommendation from NTC or OESP staff, a CWIC may be required to submit a prescribed number of individual beneficiary reports to VCU technical experts prior to sharing the reports with beneficiaries. This ensures that the information provided by initially trained CWICs is complete and accurate.

Component 4 – Finally, CWICs completing the certification process are enrolled in the NTC Supplemental Training and Technical Assistance Activities. These activities include face-to-face and online training, and individual, state, and regional technical assistance. The NTC estimates that CWICs receive approximately 60 hours of technical assistance in the first year post certification and participate in an additional 25 hours of supplemental training events.

Number of CWICs Certified – Between December 2007 and May 2009, a total of 572 individuals have been formerly certified as Community Work Incentive Coordinators (CWICs). Approximately 50 of these individuals are professionals working in SSA demonstration projects or other local partners. To date, 87% of individuals attempting to become certified as CWICs have successfully completed the process. At the present time, between approximately 450 individuals are providing services across the 104 projects.

The Typical CWIC – The “typical” CWIC has a college degree, is employed by a public agency (VR, University, etc.) and has been employed as a CWIC for over three years. One-third of the time, he or she will be a person with a disability, including many individuals who have previously received SSA benefits and have worked their way off the SSA roles.

The “typical” CWIC participates in 160 hours of training and technical assistance activities during his or her first year of employment. After the first year, the CWIC receives 85 hours of training and technical assistance each year.

The “typical” CWIC serves multiple counties or large sections of metropolitan areas. In some instances, such as in North Dakota, a single CWIC may serve virtually an entire state. Typically, from 30,000–50,000 SSA beneficiaries will reside in an individual CWIC’s catchment area. Many of the beneficiaries in the catchment area are gravely ill or possess significant health related disabilities that preclude their ability to work at the present time. However, as discussed above, as many as 20% of these individuals are estimated to be at a point in their careers where they could benefit from WIPA services.

Based on these data, the “typical” CWIC will serve a catchment area that contains 12,000–20,000 beneficiaries who are currently employed or who will be seeking employment in the near or intermediate future. *Of those, approximately 5,000 had engaged in recent work activities (worked in previous year; currently working or actively seeking employment).* These beneficiaries are the target population for WIPA projects – beneficiaries who are employed or actively seeking employment whose ongoing employment, health care, and benefit status may be jeopardized without complete and accurate information on the effects of employment on their SSA benefits.

The “typical” CWIC maintains a wait list for services. Most CWICs are overwhelmed by the number of beneficiaries seeking their services. Wait periods are generally from 15 to 20 days, with many projects now reporting that wait time for services has reached 30 days from initial contact. These long waits are very unfortunate, since the best time to encourage a beneficiary to seek employment is immediately when he or she has indicated a desire to seek employment or when employment is imminent.

Illustrations of the Accomplishments of Individual WIPA Projects – All over the country, WIPA project staff members are providing services and supports to beneficiaries who are attempting to enter the workforce for the first time, reenter employment after a long period of disengagement, improve the financial situation of themselves and their families, pursue employment training or education that will lead to meaningful and rewarding employment, and eliminate their dependence on SSA cash benefits. Examples of services provided by WIPA projects are provided below.

2.1.1. Center for independent living of middle tennessee

The Center for Independent Living of Middle Tennessee (CIL-MT) Work Incentives Planning and

Assistance (WIPA) Program serves 44 counties in western and central Tennessee. This area includes Nashville and Memphis – two of the most populous areas in the state. The project covers a WIPA service area that contains more than 150,000 WIPA eligible adults with disabilities receiving SSI and/or SSDI (nearly three fourths of the of the state's disability beneficiaries).

Five full-time CWICs provide WIPA services across the 44 counties. Three of the five CWICs have been with the project since the inception of the program eight years ago. Based on data from the National Beneficiary Survey, the National BPAO database, and the perceptions of the project, there are an estimated 60,000 individuals in the counties served by the project who are interested in obtaining employment, including 25,000 who have engaged in employment or actively sought employment during the past 12 months.

The CIL-MT is a highly productive program staffed by outstanding CWICs. The project has provided intensive WIPA services to 1,224 beneficiaries since the inception of the WIPA contract in 2006. Two of literally hundreds of success stories documenting the delivery of quality services by the project are provided below.

In Shelby County, CWIC Hope Johnson worked with Shawn, a 39-year old woman who is visually-impaired who came to the WIPA program in 2007 after being referred by her VR Counselor. Shawn was a concurrent beneficiary. The CWIC assessed her situation and found that she was a good candidate for a PASS, a very powerful, although complex, SSA work incentive. Her goal was to be a Massage Therapist. She needed assistive technology and training before she was ready for school. She began Orientation and Mobility training, plus Braille and computer classes.

After completing her training at Clovernook Center for the Blind and Visually Impaired, her VR Counselor agreed to pay for tuition, books, some supplies, some assistive technology, and transportation for her to attend school. However, VR was not able to pay for the Braille Writer that she would need. In addition, there were many other school-related expenses, such as a school application fee, massage supplies, massage table, uniforms, required background check, licensure exam, and CPR certification.

Ms. Johnson helped Shawn write her PASS and gather all of the needed documentation regarding expenses and steps to reach her goal. The PASS was approved in February 2008 and Shawn received the funds necessary to start Massage Therapy classes the very same month. Shawn has now completed her classes, passed her licensure exam, and started working

as a Massage Therapist in Memphis. She uses her own Braille Writer to keep up with appointments. Shawn utilized community resources, such as VR and Clovernook, to get her schooling and equipment. The PASS was a great SSA work incentive for Shawn to use in order to receive all of the items, supports and equipment she needed in order to be successfully employed.

In Tipton County, Ms. Johnson worked with Cindy, a 27-year old, visually-impaired woman from Millington, TN who contacted the WIPA program in 2007 after receiving confusing information in the mail from Social Security. Her father had recently retired, making her eligible for Childhood Disability Benefits (a special type of SSDI benefit for adults disabled as children). The SSA letter stated that her SSI check would be stopping and SSDI would start. Ms. Johnson explained the ramifications of "switching" from one disability program to another. Since she was currently working full-time, she had many questions about the work rules under the SSDI program, Medicare, and TennCare coverage.

Cindy and her CWIC gathered earnings information and disability-related work expenses to report to SSA. They tracked her Trial Work Period and the CWIC assisted her with the SSA work review. Because Cindy had so many work and disability-related expenses, her SSDI check continued past the Trial Work Period even though her gross earnings exceeded the Blind SGA (earnings) level. That was only due to the CWIC's help in documenting Impairment-Related Work Expenses (IRWE). Otherwise, Cindy's SSDI check would have stopped. The CWIC has continued to assist Cindy with questions regarding her health insurance and properly reporting earnings information to SSA. She has received two raises in the past couple of years and has contacted the WIPA program as needed.

2.1.2. Easter Seals of North Texas

The WIPA program of Easter Seals of North Texas serves individuals receiving Social Security Disability and/or Supplemental Security Income benefits in 19 counties in the North Texas area. Each beneficiary they meet receives an individualized Benefits Summary which summarizes the work incentives discussed and an action list. This action list acts as a catalyst for taking those needed steps to enter employment. It is the goal of the WIPA project to not only educate beneficiaries but to guide them to take the steps necessary to obtain and maintain employment.

Over the past three years, the project's five CWICs have provided intensive, long-term work incentives support to 1,302 beneficiaries. Of these 1,302 con-

sumers, 184 are employed, with 52 working at or above the current SGA level of \$980 a month. Sustaining this level of income will mean that approximately 3.5% of the individuals provided more intensive WIPA services will eventually become self-sufficient. This success rate is more than three times the national benchmark rate of 1% of all SSA disability beneficiaries.

The project employs four full-time CWICs, with one serving as both a CWIC and the Project Director, and one part-time CWIC. The project serves a 19-county area in North Texas, some parts of which are rural. Out of the five staff members, three of them have significant disabilities. Two of them were once on the Social Security benefit roles but have now worked to the point where they are not. One staff member was a client under the BPAO program and now is employed as a full-time CWIC covering three counties. The project director, Ms. Cindy Herzog stated recently,

Over the history of both BPAO and WIPA, we have been able to see thousands of beneficiaries and many have entered into employment. We have seen clients who have never worked before, enter into employment for the first time, breaking that cycle of dependence on benefits. The program as a whole has been a great success and we look forward to increasing the numbers of beneficiaries who leave the roles completely, one case at a time. This is a challenging but fulfilling line of work. We have the opportunity and privilege to present and create positive change for individuals living with disabilities.

3. The need for expanded WIPA services

The WIPA projects provide encouragement and direct assistance to SSA beneficiaries seeking to obtain employment for the first time or improve their employment situation. The SSA rules and regulations regarding beneficiaries are complex and often overwhelming for beneficiaries. WIPA projects can directly support beneficiaries who otherwise may be unnecessarily apprehensive of pursuing their career goals due to fears that employment may lead to a loss of health care and other benefits. Every day, CWICs are assisting beneficiaries to take the first step toward employment.

Unfortunately, the national WIPA initiative lacks sufficient capacity to adequately meet current and future demand. The number of beneficiaries requesting services has continually overwhelmed a large number of local programs. The problem is particularly acute for

WIPA programs in rural areas where extensive travel requirements reduce potential service time.

The WIPA capacity problem is exacerbated by the fact the program has been flat-funded since its inception in 2000, without any inflation increase over the past seven years. In addition, when SSA wisely increased the minimum amount of funding for WIPA projects from \$50,000 to \$100,000 in 2005, the funding level of a number of WIPA projects, particularly in SSA Region IV, actually declined.

WIPA projects struggle to find the resources to provide long-term follow-up services to beneficiaries. In most projects, CWICs are doing an outstanding job of providing initial advisement services to beneficiaries. However, the demands on their time make it difficult for them to provide proactive follow-up services to beneficiaries weeks or months after their initial contact with the beneficiary. Lack of ongoing follow-up services reduces the ability of CWICs to assist beneficiaries to access and benefit from needed employment services, decrease the number of individuals experiencing an overpayment, and assist the beneficiaries in career advancement activities.

Youth are currently not significantly represented in the population served by the WIPA program. Less than six percent of beneficiaries receiving services from the prior BPAO program were under the age of 22. The challenges faced by transition-aged beneficiaries are unique, and specific work incentives have been developed to assist them in their employment efforts. Future BPAO outreach activities should focus on contacting and serving adolescents and young adults.

The WIPA projects assist many other entities to provide employment services and supports. Across the country, WIPAs are coordinating their efforts with Workforce Development Centers, Vocational Rehabilitation agencies, mental health centers, community rehabilitation programs, secondary schools and institutions of higher education, Veterans service centers, and employment service organizations. These partnerships, which have expanded dramatically over the past several years, enable the WIPA projects to more effectively assist beneficiaries to pursue their employment goals.

Many state Vocational Rehabilitation agencies refer most if not all SSA beneficiaries applying for services to WIPA projects prior to initiating services. The WIPA program has contributed significantly to the ability of Vocational Rehabilitation to better meet the needs of beneficiaries. Similarly, many Employment Networks and mental health centers request the services of WIPAs

prior to delivering services. The WIPA program is critical to efforts to promote employment outcomes and economic self-sufficiency among beneficiaries.

An example of the assistance provided to other employment programs is the SSA/Vocational Rehabilitation reimbursement program, in which SSA reimburses individual state Vocational Rehabilitation agencies for serving SSA beneficiaries who meet specific employment goals, that returned over \$124 million to state VR agencies in FY 08. When serving SSA beneficiaries, many VR agencies require the beneficiary to seek the services of a WIPA prior to initiating employment services. As a result, WIPA projects play a critical role in the successful employment outcomes of literally thousands of these beneficiaries, even though the WIPA projects receive absolutely none of the reimbursement funds generated in part by their services.

The WIPA program is vital to SSA's efforts to reduce and eliminate the chronic problem of overpayments. The vast number of overpayments currently facing beneficiaries in every state creates a second "disability backlog" for them and SSA. The overpayment backlog has many causes and very few solutions. Among the causes are the unnecessarily complex SSA rules that do not even measure earnings across the SSI and SSDI programs in a consistent way, and a lack of automation in wage reporting systems that makes it very difficult for beneficiaries to comply with wage reporting rules. Even SSA's attempts at further automating the system have significant limitations. For example, the recently initiated telephone reporting system has significant potential, but currently cannot be used by beneficiaries who are taking advantage of the work incentive provisions that SSA has encouraged them to use.

At the core of the problem is the lack of resources currently devoted to addressing this issue. Responsibility for processes that could eliminate or ameliorate the overpayment problem is currently spread across teleservice centers, program service centers, and field offices. WIPA projects can work with beneficiaries to accurately report their earnings and minimize the impact of overpayments on their personal and family finances. This is a function that cannot be performed by SSA field offices but is vital to any realistic SSA employment initiative.

Today, literally hundreds of SSA beneficiaries are in overpayment status. Frustratingly, SSA continues to devote extensive resources to an intractable administrative problem that continually gets worse and worse. The fear and reality of overpayments actually causes many beneficiaries to reduce and curtail their employ-

ment efforts. Many others experience extreme financial hardship as they and their families are forced to repay monies they erroneously received, even though they complied with every reporting deadline in a timely and accurate manner. Continuing and expanding the WIPA program will greatly assist in a reduction of the overpayment backlog and lessen the impact of overpayments in beneficiaries and their families.

Over time, the WIPA program can literally "pay for itself." The WIPA program should be judged on two outcomes. The first is increased beneficiary use of specific SSA work incentives. The second is increased employment participation and reduced receipt of disability benefits by program participants. When a CWIC works with a beneficiary to overcome their fears of employment and increased earnings on their benefits, he or she is not only contributing to the employment success of the beneficiary, but also the employment service program (VR, DOL, EN, etc.) that assists the beneficiary. When a state VR agency or EN requires some or all referrals to receive WIPA services prior to initiating a support plan, and then receives SSA reimbursement for specific beneficiary employment outcomes, the "credit" for these outcomes should fall not only to the employment agency, but also to the WIPA program. Over time, the implementation of a more sophisticated program to evaluate the outcomes of WIPA activities can clearly document the cost-effectiveness of the program.

An example from the state of Kentucky illustrates the extent to which WIPA projects are working to create significant savings for Congress and SSA. In Louisville, the Center for Accessible Living, Inc. provides services to 70 counties, including Jefferson and Fayette – the two most populous counties in the state of Kentucky. Four CWICs serve this large project area that includes 175,000 WIPA eligible SSA beneficiaries, an average of 42,000 per individual CWIC.

The lone CWIC serving Jefferson County (Louisville) responded to over 600 referrals for WIPA services over the past two years. Referrals could be much higher and additional resources are needed to address current demand. However, with only one staff member serving a county with over 35,000 beneficiaries, very little outreach activity actually occurs. Over the past two years, this single CWIC has assisted 14 beneficiaries to work their way off SSA cash benefits, saving Social Security over \$130,000 per year. These savings will increase exponentially over time as additional beneficiaries no longer receive cash benefits.

4. The need for additional WIPA resources

The current WIPA program has been highly successful. It has increased the employment participation and self-sufficiency of hundreds of thousands of individuals and has assisted other employment service agencies to more effectively meet the needs of beneficiaries. However, the program simply doesn't have the resources necessary to respond to the current and future demand for services. With additional resources, the program can serve a larger number of beneficiaries, reduce the number of beneficiaries negatively impacted by the overpayment backlog, and continue to generate additional program savings.

The WIPA program is currently staffed by approximately 450 CWICs nationwide. The number of CWIC positions should be significantly expanded. Based on all currently available data and the results of a current program capacity workgroup, it is recommended that funding be provided to support an additional 1,600–1,800 CWICs. This increase could be easily absorbed into the existing service delivery network and would have the following benefits:

- *Additional WIPA resources would allow the program to expand the number of beneficiaries supported in their employment efforts and reduce the current wait time for services (1,000 CWICs).* Wait lists for WIPA services in many Congressional districts are reaching 30 days. This flies in the face of a key principle of employment services – that individuals should receive assistance at precisely the point at which they have made a serious commitment to obtain or return to employment. An additional 1,000 CWICs would significantly improve the current lack of program capacity. Since current evidence indicates that WIPA services can increase the rate of beneficiaries working their way off benefits to three times over the national average, this type of increase would ultimately result in savings to both the trust fund and the general fund.
- *Additional WIPA resources would allow programs to provide more intensive long-term services to beneficiaries, improving employment retention and reducing beneficiary dependence on SSA cash benefits (200 CWICs).* The WIPA program has been very successful in assisting beneficiaries to obtain meaningful employment. However, the current lack of capacity prevents many projects from providing the proactive long term follow-up

services necessary to help beneficiaries maintain employment, advance in their careers, and leave the benefit rolls.

- *Additional WIPA resources would allow WIPA projects to increase their efforts to reduce overpayments to beneficiaries by ensuring that individuals report their earnings accurately and plan for the possibility of overpayments during employment (200 CWICs).* The overpayment problem is particularly frustrating to beneficiaries and their families. The current SSA system designed to receive reports of beneficiary earnings and make accurate payments to working beneficiaries simply doesn't work. The current system isn't designed to pay beneficiaries the proper amount. It is designed to pay them too much and then demand that they pay it back, even though the individual is trying to work, reduce or eliminate the need for disability benefits, and has complied with all program rules for timely reporting. Overpayments are built into our system, they are demoralizing to working beneficiaries, and frequently result in the individual disengaging from the workforce. With funding for an additional 200 CWICs, the WIPA program can significantly ameliorate the impact of overpayments on individuals and their families and help to ensure that the problem doesn't lead to individuals abandoning employment altogether.
- *Additional WIPA resources would allow the program to conduct more directed outreach efforts to currently underserved populations, such as transition-age youth and veterans (200–400 CWICs).* There are subgroups of the beneficiary population that are not adequately served by the WIPA program at the present time. Foremost among these are transition age youth leaving secondary special education programs and veterans who receive Disability Compensation or Disability Pension benefits under VA as well as Social Security benefits. An additional 200–400 CWIC positions would enable the WIPA program to meet this serious unmet need.

5. Summary

The national WIPA initiative is an important employment support program that has helped hundreds of thousands of SSA beneficiaries to overcome their concerns regarding the effect of employment on their benefits status and health care coverage and pursue

meaningful employment and/or return to work after a lengthy absence. Other major employment service providers (i.e. state Vocational Rehabilitation agencies, One-Stop Centers, mental health agencies, community rehabilitation programs, etc.) all acknowledge the key role WIPA projects play in supporting and enhancing their services to SSA beneficiaries. As the program has become established over time, WIPA projects have been able to help thousands of individuals to relinquish their dependence on SSA cash benefits and pursue meaningful careers.

At the same time, the WIPA projects across the country continue to face an overwhelming demand for their services. Additional resources would enable

the projects to meet the immediate needs of beneficiaries who are making the initial decision to pursue employment, acquiring the supports and accessing the work incentives that are necessary to enable them to sustain employment for a lengthy period of time, or dealing with the demoralizing effects of an SSA overpayment on their career goals and their family finances. Additional resources would enable the program to: (1) serve hundreds of thousands of additional beneficiaries nationwide who are right now actively engaged in pursuing employment; (2) reduce the negative effects of overpayments on beneficiaries and their families; and (3) target services to transition age youth, veterans, and other currently underserved groups.