

So, Your PASS was Approved -- Now What? Tips for Helping Beneficiaries Manage a Plan to Achieve Self Support

Congratulations – your PASS was approved!!

Getting your Plan to Achieve Self-Support or PASS approved is a wonderful accomplishment, but it marks the beginning of your journey – not the end. The purpose of your PASS is to help you achieve your occupational goal which will lead to increased self-sufficiency through paid employment. From now until your PASS ends, there are lots of things you need to do to keep your PASS moving forward. This fact sheet offers some practical tips for managing your plan successfully over time.

TIP 1: Setting up your PASS checking account

If you have not already done so, now is the time to set up a separate checking account to deposit your PASS funds into. Unless you are using your PASS to start a small business, it is strongly recommended that you use a separate account instead of mingling your PASS funds in with your other money – even if the PASS specialist says this is OK!!! Here is why:

- It is simply easier to keep track of the PASS deposits and expenditures if you use a separate account. Your bank statement each month will provide you with a ready-made record of your transactions!
- Be sure your account is a checking account – NOT a savings account. You may need to use the cancelled checks as your receipts in some instances.
- A separate account helps you stay more organized and accountable. It will be less tempting for you to spend your PASS funds on other things if you keep them separate.
- Do NOT withdraw cash from your PASS account if at all avoidable. It is impossible for the PASS specialist to know how you used the funds when you use cash. Always pay for PASS expenses with checks or use your debit card. Don't get ATM withdrawals from your PASS account since these are cash transactions.

- Never use your PASS checking account to pay for any expenses except those specifically approved in your PASS – even if you plan to “pay the PASS account back later”. This is simply a bad practice and should never be done.

In some cases, it may be alright not to use a separate bank account for your PASS funds. When you use a PASS to start a small business, it is generally most convenient to just put your PASS funds in your business account. However, you still have to track what you spend your PASS money on!

Tip 2: Make sure you are clear on the amount to deposit and how funds may be spent

Be sure you have reviewed your approved plan carefully to see how much you are supposed to be depositing and on what schedule. Some PASS plans require a monthly deposit, while others may require no deposits after the initial one. If you have any questions about deposits – ask your assigned PASS Specialist now, before you get started! Also – make sure you have the most up to date list of approved expenditures. In some plans this is very broadly defined. Your plan may say something like “business operating expenses” without much (or any) detail. Some plans will have very specific items listed.

Never under any circumstances should you pay for something that is NOT on the list of approved expenses. If something comes up that you need, call your PASS Specialist to ask for approval BEFORE you write the check!

Tip 3: Talk to your PASS Specialist about the best way to communicate with him/her and what issues to communicate about

PASS Specialists differ in terms of how they want to communicate with beneficiaries so don't assume anything. Make sure you know whether your assigned Specialist prefers phone calls or email messages. Have you checked to find out how often your PASS Specialist expects to hear from you? It is a very good idea to make a list of the issues that your PASS Specialist has asked that you contact him/her about and keep that list on hand so you won't forget. The best plan is always to establish and maintain open channels of communication with your Specialist. Asking for forgiveness instead of permission when it comes to managing your PASS is definitely NOT a good idea!

Will anyone else be acting as your authorized representative on PASS issues? Do you have a Community Work Incentives Coordinator (CWIC), other Benefits Specialist, family member, accountant, business advisor, or anyone else who will need to speak with your PASS Specialist on occasion? Make sure the Specialist knows who is in your circle and that he/she has permission to speak with these authorized representatives. It is always helpful to give the PASS specialist the names and contact info for these people and to tell the people who are helping you who the PASS Specialist is.

Finally - make sure you are clear about what issues the PASS Specialist deals with as opposed to what you need to communicate to local SSA Field Office personnel about. It is not uncommon for beneficiaries to make incorrect assumptions about the internal workings of SSA that can cause problems later on down the road. Don't leave this to chance – ask your PASS Specialist about whom to send pay stubs to, how to report other changes like living arrangement, etc.

Tip 3: Set up your PASS record keeping system

Managing your PASS successfully means keeping accurate records for as long as your PASS is active. More than anything else, poor recordkeeping is the area that causes beneficiaries problems with their PASS plans!! You need to have a system for keeping and storing receipts for your PASS purchases, your banks statements, correspondence to and from SSA, your pay stubs, and any other pertinent information. This does not mean that you have to spend lots of money on expensive filing cabinets, computer equipment, or organizational systems. The main thing to remember is that all this information must be KEPT (not thrown away or lost) and it should be stored together in a place where you can easily retrieve it when needed. You need to plan for recordkeeping right away and stick with it over time.

For those of you who are using a PASS to start a small businesses, you absolutely MUST keep accurate and complete accounting records – this means keeping written records of your business income and expenses. If you don't know how to do this, get help from a qualified book keeper or accountant. The way you set up your accounting system depends on which type of benefits you receive and the nature of your business. Make sure your accountant has an understanding of how Social Security benefits are affected by how business income is tracked. Don't assume all accountants know this – they DON'T! Keeping your small business finances in order is more than just a Social Security issue – this is an IRS requirement as well!

Tip 4: Know your PASS milestones and when they are to supposed to be met

Every PASS contains a list of milestones with dates by which these milestones are supposed to be achieved. Your PASS Specialist will be using these milestones to measure your progress toward achieving your occupational goal. For that reason, you need to know what your milestones are and should be keeping a close eye on when each milestone is supposed to be met. Keeping a chart with each milestone listed and the deadline is a really good way to keep you focused on what has to be accomplished by when.

If you see that a milestone will not be achieved on time, it is a good idea to discuss it with your PASS Specialist in advance. This way, you can work together to figure out another way to meet this objective and agree on another deadline. Again, it is best to deal with things like this in an up-front, proactive manner instead of waiting for the PASS Specialist to conduct a progress review and notice that you are behind on your milestones. Your PASS Specialist will be much more willing to work with you if he/she feels you are being honest and forthright about things.

Tip 5: Understand and follow the rules for making changes to your PASS

Your PASS is sort of like a contract that you have with SSA. This means it can't be changed unless SSA agrees to the changes. If there are changes you want to make to your plan – any changes at all, no matter how minor they might seem – you should ALWAYS discuss them with your PASS Specialist in advance. It is best to request these changes in writing. If the changes you requested are approved, your plan will be “amended” to include those changes and you will get confirmation of these changes in writing.

PASS Specialists are experts in managing PASS plans. They deal with scores of plans every year and have lots of experience with handling things you may need to achieve your occupational goal or overcoming problems you may be encountering. When seeking changes to your PASS, don't be surprised if your original request is not approved, or is not all approved at once. If you are asking for major changes, the PASS Specialist may make some of the changes “conditional”. That means that you will need to achieve certain milestones before other changes are permitted.

Tip 6: Make sure you understand the rules for suspending or terminating your PASS

In a perfect world, everything would go exactly as planned and achieving your occupational goal would happen like clockwork. Unfortunately, we do not live in a perfect world. There are always unforeseen circumstances and problems that arise to challenge us. There may come a time when you need to stop your PASS temporarily and there are even instances in which a PASS needs to be ended permanently. SSA has different procedures for suspensions and terminations of PASS plans.

A PASS may be suspended for all sorts of reasons. For instance, if you became seriously ill or had a family emergency which meant you would not be able to meet certain PASS milestones on time you might want to request that your PASS be temporarily suspended. Unfortunately, suspensions do not always occur at the request of the beneficiary. Your PASS could also be suspended if you failed to comply with requests for information or were not cooperating with the PASS Specialist. A PASS may be suspended for up to 12 consecutive months. Generally, if the PASS has not been resumed within that 12 month

period, it will be terminated. You may be allowed to resume a PASS that was suspended for more than 12 months as long as you were not terminated from the SSI program – but this is up to the discretion of the PASS Specialist.

Your PASS terminates when you reach the end date previously agreed upon with your PASS Specialist, or if earlier, when your eligibility for SSI benefits terminates, or when 12 consecutive months have elapsed from the date of the PASS suspension decision without the plan being resumed. Keep in mind that if your PASS is terminated because you misused your PASS funds, SSA may require you to pay back some or all of the PASS funds!

Tip 7: Know what to do if you disagree with a decision your PASS Specialist makes

There may be a time when your PASS Specialist makes a decision regarding your PASS that you disagree with. The first step in handling this situation is to ask the PASS Specialist to explain why the decision was made. This is known as requesting a conference. The federal rules governing PASS plans are pretty complex and there are limitations that PASS specialists must adhere to. If you can have the rules explained to you, it often helps you understand why decisions about your PASS were made the way they were. You may even ask to see a copy of the regulation that the PASS Specialist used to make the decision about your case. Social Security's Program Operations Manual System or POMS contains all of the procedures governing the PASS program. This is public information and is available online at <http://policy.ssa.gov/poms.nsf/aboutpoms> if you want to look the procedures up yourself.

If you still disagree with the decision after your conference, you need to request something called a "reconsideration". You must make this request in writing either by fax or through the mail to your assigned PASS Specialist. This way you have a record of the request. During a reconsideration, your case is reviewed by another PASS Specialist to see if the initial determination was correct. You will be notified in writing of the result of this reconsideration.

Tip 8 - Understand that ultimately YOU are responsible for managing your PASS

Your Plan to Achieve Self-Support is exactly that – it is YOUR plan. While somebody else like a CWIC Benefits Specialist, VR counselor, job coach or case manager may have helped you develop or write your PASS, it is still YOUR responsibility to manage it over time. The PASS Specialist will primarily communicate with you and/or your representative payee about PASS matters and expects you to be knowledgeable about the progress being made. In other words, there really is no way to delegate this job to someone else – you are the one who needs to be responsible since you are the one SSA holds accountable. You are the one who will benefit if the plan goes well and you are

also the one who will suffer if you fail to manage PASS funds properly. It is in your best interest to stay involved and active in the process.

Does this mean that you are not allowed to get help with your PASS when you have questions or when problems arise? Absolutely not. You may get help from your PASS Specialist, your local WIPA project BPAO Benefits Specialist, your business advisor or anyone else. The point that you need to understand, is that your cash benefits are affected by the PASS for better or for worse. PASS is a truly empowering self-directed work incentive, but with that empowerment comes responsibility. Using a PASS is a great way to develop the skills necessary to live a more independent and self-sufficient life.

