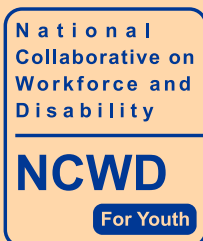


Use of Social Security Work Incentives

*to Promote Work-Based Learning
in Youth Employment and Training Programs*

Susan Cohen
Toni Jones
Jennifer Pirnie



Navigating the Road to Work

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The National Collaborative on Workforce and Disability for Youth (NCWD/Youth) is composed of partners with expertise in disability, education, employment, and workforce development issues. NCWD/Youth is housed at the Institute for Educational Leadership in Washington, DC. The Collaborative is charged with assisting state and local workforce development systems to integrate youth with disabilities into their service strategies.

Information on the Collaborative can be found at www.ncwd-youth.info.

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Executive Summary

This report examines AmeriCorps as a model that includes an income exemption that allows youth with disabilities who are Social Security beneficiaries to participate in work-based learning experiences and receive a living allowance or stipend without it impacting their benefits. An overview is initially provided about the importance of work-based learning experiences, including service learning, particularly for youth with disabilities and the current state of policy and practice regarding the use of the AmeriCorps income exclusion. Recommendations are then provided for increasing the scope and utilization of the existing AmeriCorps exemption and for the expansion of simi-

lar incentives to other youth employment and training programs serving transition-age youth with disabilities such as those funded under the Workforce Investment Act (WIA).

Federal support for volunteerism dates back to the 1930s, when President Franklin D. Roosevelt established the Civilian Conservation Corps during the Great Depression to engage displaced workers in service to meet public needs. Federally-supported civilian service was renewed in the 1960s with President John F. Kennedy's creation of the Peace Corps and President Lyndon B. Johnson's creation of Volunteers in Service to America (VISTA).



The National and Community Service Act of 1990 signed by President George H.W. Bush created a new independent federal agency to administer grants to schools to support service-learning in schools, higher education institutions, community-based organizations, and full-time service across the nation. In 1993, President Bill Clinton and Congress combined this agency with another federal volunteer entity to create the Corporation for National and Community Service (CNCS) with the responsibility to mobilize Americans into service through three programs: Senior Corps, AmeriCorps, and Learn and Serve America. National service laws were strengthened and appropriations for programs reauthorized through FY2014 by the Edward M. Kennedy Serve America Act, which passed with bipartisan support and was signed into law by President Barack Obama in 2009.

Federal support for volunteerism has also taken the form of legislation to encourage Social Security disability beneficiaries to participate in service programs. Under the Domestic Volunteer Service Act of 1973, beneficiaries of the Social Security Disability Insurance program (SSDI) and other selected Social Security programs are eligible to receive stipends and additional benefits for participation in specified volunteer programs without impact on their Social Security payments or eligibility status. The Small Business Act contains similar provisions. VISTA, which was renamed AmeriCorps VISTA following passage of the National and Community Service Trust Act of 1993, qualifies for this type of Social Security employment support or work incentive known as “income exclusion.”

In 2008, President George W. Bush signed into law the Heroes Earnings Assistance and Relief Act (the HEART Act) to amend the Internal Revenue Code of 1986 to provide benefits for military personnel. The HEART Act also made national service more accessible to people with disabilities by directing the Social Security Administration (SSA) to exclude the AmeriCorps stipend and other benefits for determination of eligibility and calculation of monthly payment amounts for beneficiaries of the Supplemental Security

Income program (SSI).

AmeriCorps

AmeriCorps is a national network of service programs that engage Americans to meet the nation’s needs in priority areas. In 2012, CNCS dedicated a significant level of funding to programs working in disaster services, economic opportunity, education, environmental stewardship, healthy futures, and veterans and military families.

Members serve at more than 3,000 not-for-profit organizations that receive grants from AmeriCorps through AmeriCorps State and National; AmeriCorps VISTA; and AmeriCorps NCCC (National Civilian Community Corps. Modeled on the Civilian Conservation Corps established by President Roosevelt, U.S. citizens, nationals, and lawful residents aged 17 and over are eligible to apply for and are expected to complete full- or part-time terms of service over one to two years. Applicants must also satisfy the eligibility requirements of the individual AmeriCorps grant recipient programs to which they may be assigned. AmeriCorps members receive a modest living allowance (\$10,000 – \$14,000 for 10 – 12 months of service) and assistance with college costs and student loans. Some programs also provide housing. Through national service, AmeriCorps members gain valuable experience and skills that can be leveraged for employment once their term of service is complete. Members also learn soft skills such as teamwork, communication, responsibility, and other career-readiness skills.

CNCS, which oversees AmeriCorps, has a long-standing commitment to disability inclusion. As of 2012 (the most recent year for which information is available), 35 states formed inclusion teams to ensure that national service programs involve the disability community. In addition, grants provided by CNCS allowed for the purchase of accommodations and auxiliary aid equipment as well as hiring of disability inclusion experts, coordinators, or contractors to assist with outreach, recruitment, reasonable accommodation, and retention. Disability grants to the State Service Commissions ceased in fiscal year 12. Qualified members

are informed of their right to reasonable accommodation for disabilities in the *AmeriCorps Handbook*.

Work-Based Experiences as a Pathway to Employment

The AmeriCorps model of providing a stipend or living allowance in exchange for a fixed term of service presents a promising pathway to employment, particularly for transition-age youth with disabilities. Community service is listed among the on-the-job training experiences identified as necessary to prepare youth for transition to adulthood by the National Collaborative on Workforce & Disability for Youth (NCWD/Youth) in the *Guideposts for Success*.

AmeriCorps service also offers other work-related experiences identified as important by the *Guideposts for Success*, including:

- Opportunities to engage in a range of work-based exploration activities;
- Opportunities to learn and practice their work skills; and,
- Opportunities to learn first-hand about specific occupational skills related to a career pathway.

In addition, the AmeriCorps model also offers other experiences that the *Guideposts for Success* indicate youth with disabilities need including the opportunity to:

- Understand the relationship between benefits planning and career choices;
- Learn to communicate their disability-related work support and accommodation needs; and,
- Learn to find, formally request, and secure appropriate supports and reasonable accommodations in education, training, and employment settings.

The income exclusions available to SSI beneficiaries who participate in AmeriCorps programs and SSDI beneficiaries in AmeriCorps VISTA add further appeal. With these employment supports, beneficiaries can gain work-based experiences and skills through participation in career readiness programs without risk

of penalty or loss of disability benefits. Expanding the availability of incentives such as this to other youth employment and training programs serving transition-age youth with disabilities such as those funded under WIA could help to facilitate their successful transitions to adult employment.

Use of Social Security Work Incentives in AmeriCorps' Volunteer Programs

The potential for Social Security work incentives available to AmeriCorps members to serve as a bridge to employment has not yet been fully realized due to structural “disincentives,” and a lack of awareness, understanding, and coordination between providers involved in implementation. Initially, some Social Security disability beneficiaries continue to be reluctant to participate in programs that provide a living allowance or stipend because of fear of losing or reducing their benefits. Concerns are particularly acute for SSDI beneficiaries, for whom the income exclusion is only available within AmeriCorps for AmeriCorps VISTA. Individuals may be eligible for concurrent disability benefits under both the SSI and SSDI programs. As shown in the table on the next page, unlike SSI payments, which fluctuate based on the beneficiary's countable income, SSDI is “all or nothing.” Monthly SSDI payments are based on a worker's lifetime average earnings covered by Social Security. If income exceeds the level of Substantial Gainful Activity (SGA) in a given month, SSDI benefits payments will cease.

In addition, although there is evidence that supports that work based learning experiences, like AmeriCorps, increase employment outcomes for youth with disabilities, some benefit advisors appear hesitant to recommend service learning programs to clients with disabilities because job training, career readiness, and professional development programs do not qualify as “gainful employment” by SSA standards.

According to those interviewed, the work incentives for programs that support work-based learning experiences are also not well known within SSA. This

may be due to the sheer volume of claims, and frequent policy updates that field representatives receive. In addition, SSA field offices must prioritize a number of needs, starting with food and housing. Nevertheless, it is notable that the work incentives available for AmeriCorps programs were recently added to SSA's *Red Book*, a summary guide for employment supports for persons with disabilities that is used extensively outside of the SSA system by educators, advocates, rehabilitation professionals, and counselors, as well as applicants and beneficiaries.

An additional hurdle to the use of service learning as a pathway to employment is the lack of awareness of the Social Security income exclusions available for AmeriCorps programs by Employment Networks [ENs] and other workforce development professionals. Funding for state vocational rehabilitation agencies is also predicated on work plans that strive for income greater than or equivalent to SGA.

The decentralized structure of AmeriCorps may also inhibit the exchange of information and coordination of procedures and practices. Awareness of the HEART Act and other relevant legislation throughout the AmeriCorps network varies greatly. Due to privacy considerations and civil rights protections, AmeriCorps program staff rely on members to “self-disclose” information about disabilities, required accommodations, or government benefits they may be receiving. State disability coordinators and program staff do, however, receive training regarding the potential impact of service benefits on SSI and SSDI. Members are referred to Work Incentive Planning and Assistance (WIPA) projects, through which Community Work Incentive Coordinators

(CWICs) provide guidance to SSA beneficiaries about how to report the living allowance to safeguard public assistance benefits that they may be receiving. Resources available for distribution when questions arise are limited, and “best practices” for obtaining guidance from State Service Commissions or AmeriCorps’ national office have not been widely distributed. The National Service Inclusion Project (NSIP), a training and technical assistance provider, is available for general information and referral resources.

To address these issues, CNCS is exploring strategies to increase involvement with WIPA projects, which receive grants from SSA to provide disability beneficiaries, including transition-age youth over the age of 18, with free access to work incentives planning and assistance. CNCS is working to connect WIPAs with disability coordinators at the state level.

AmeriCorps Model: A Possible Pathway to Employment for Youth with Disabilities in Other Youth Employment and Training Programs

WIA provides for the creation of youth employment programs for disadvantaged youth that include educational, employment, and life skills goals. A significant proportion (13.3%) of youth who participate in programs supported by WIA formula funds have identified as having a disability. Work-based learning experiences under WIA can include both paid and unpaid opportunities to work and practice career readiness skills. Programs such as YouthBuild, Job Corps, and Summer Youth Employment are critical components of preparing youth for the transition to



2. Colley, D. A., & Jamison, D. (1998). Post-school results for youth with disabilities: Key indicators and policy implications. *Career Development for Exceptional Individuals*, 21, 145-160.

adulthood.

Stakeholders concerned with improving the employment outcomes of youth recognize the importance of volunteer and work-based programs such as AmeriCorps as a way to offer career preparation experiences needed by youth to transition to adulthood successfully. If income exclusions similar to those available to AmeriCorps members were available in other youth employment and training programs such as those provided under WIA, program participation by youth beneficiaries would likely increase. In addition, the availability of such an exemption could potentially result in improved long term employment outcomes, given that having prior paid work experience as a youth is a strong indicator of adult employment success for this population.²

Expanding the income exclusion would obviously require legislative action. In the current fiscal environment, a paradigm shift of this magnitude would likely need to be attached to broader legislation—just as the SSI income exclusion was established by the HEART Act, which was aimed at veterans. To demonstrate the viability of the approach, a pilot demonstration would likely first be necessary.

AmeriCorps does not currently track post-service outcomes or performance measures for its grant recipients, as is required under WIA and other youth-focused employment and training programs. Further, post-service employment is also not included as a performance outcome for AmeriCorps grant recipients. Case studies are available on the AmeriCorps and CNCS Web sites, however, documenting stories of service for AmeriCorps members with disabilities. Former AmeriCorps members interviewed by the study team all credit their AmeriCorps experience with helping to secure paid employment.

New research is underway, however, that will help fill this void. CNCS recently released a report titled “Volunteerism as a Pathway to Employment.” The report provides empirical evidence that establishes a connection between volunteering and employment and highlighted data showing that volunteerism improves employment outcomes for populations that experience

significant barriers in the job market, such as individuals who do not have a high school diploma. Further, CNCS and the Social Security Administration have recently entered a data sharing agreement that will facilitate easier tracking and data collection concerning service corps members who receive benefits. Additionally, the Kennedy Serve America Act directs the U.S. Government Accountability Office (GAO) to develop performance measures for each national service program and make an assessment every five years. The first assessment will occur in 2014. The legislation also includes an authorization for a 10-year longitudinal study on the benefits/impact of service-learning programs.

Recommendations

Collaboration among policy makers at the federal and state level is needed to strengthen and increase utilization of the income exemption currently available under AmeriCorps model and to develop a framework for the possible expansion of the use of such work incentives in other youth employment and training programs such as those funded under WIA. Below are five sets of recommendations for stakeholders interested in facilitating successful employment transitions for youth with disabilities who are Social Security benefit recipients.

Recommendations for federal policy makers

Build on the foundations established by the Domestic Volunteer Service Act of 1973, the HEART Act of 2008, and the Kennedy Serve America Act of 2009 by supporting a pilot demonstration project as a precursor to the possible enactment of legislation that would allow transition-age youth receiving Social Security benefits to take advantage of paid time-limited career development experiences in other federally funded employment and training programs without risking a loss of benefits as a pathway to employment. The reauthorizations of WIA, the Elementary and Secondary Education Act, etc., may provide an appropriate forums.

Consider expanding the existing work incentives available to Social Security SSI beneficiaries participating in AmeriCorps programs to all Social Security beneficiaries.

Recommendations for the Office of Disability Employment Policy and the Department of Labor

Consider working with the Veterans Administration and the Veterans Employment and Training Service to pursue legislation that would allow Social Security beneficiaries to participate in work-based learning experiences without fear of losing their benefits.

Recommendations for the Social Security Administration

Issue policy guidance which discusses the income exclusions for service learning currently available under AmeriCorps and promotes their use as an important strategy for moving beneficiaries from dependency to employment.

Consider expanding the income exclusion available under AmeriCorps to other federally funded employment and training programs to promote work-based learning because of the opportunities it provides for the development of work-related skills and the correlation that exists between paid work experience for youth with disabilities and successful adult employment outcomes.

Launch a far-reaching communications campaign to educate employees and beneficiaries in the SSA system about the work incentives available for Social Security disability beneficiaries who participate in service-learning, volunteer programs, and other work-based learning experiences. Elements of such a campaign could include the following:

- **Preparing an electronic postcard** that can be sent to SSDI and SSI beneficiaries promoting work-based learning experiences, including volunteerism, as a bridge to development of

career skills and work experiences; and

- **Customizing a campaign to increase awareness** among state Vocational Rehabilitation/ Rehabilitation Services Administrations, American Job Centers, and other workforce development stakeholders.
- **Providing training to SSA representatives** in field offices, as well as to AWICS, and WIPAs to establish best practices for advising Social Security disability beneficiaries about the opportunity to develop skills and work experience through participation in service and volunteer programs. “Specialists” in employment supports for volunteer and service programs should be identified in each SSA region where possible.

Recommendations for CNCS

Increase awareness among AmeriCorps’ grantees and State Service Commissions that the AmeriCorps living allowance is excluded from income calculations for SSI beneficiaries and SSDI beneficiaries participating in AmeriCorps VISTA. This could be addressed through the following:

- **Implement a communications campaign** targeted at CNCS departments, State Service Commissions, and national not-for-profit organizations to build awareness of Social Security work incentives to encourage people with disabilities to enroll in AmeriCorps
- **Develop a fact sheet** detailing how the AmeriCorps’ living allowance is treated for Social Security disability programs that can be downloaded by AmeriCorps programs and State Service Commissions from the AmeriCorps Web site; and
- **Prepare materials and training curriculum** to educate staff at State Service Commissions about Social Security disability benefits to encourage utilization of existing work incentives and minimize confusion and concern for beneficiaries. Materials could include templates that AmeriCorps grant recipients and participants can download from the Internet for use

for communication with SSA.

CNCS could also support greater utilization of the existing Social Security work incentives to promote volunteerism as a pathway to employment by:

- **Modification of the AmeriCorps application form and intake guides** used by grant recipients to collect data about participants who are receiving Social Security disability benefits (while maintaining compliance with the ADA and Section 504 of the Rehabilitation Act of 1973). This would help establish a baseline for performance measures to evaluate outcomes for AmeriCorps members with disabilities.
- **Ensuring that as the GAO moves forward in developing performance measures for each national service program**, these metrics include the use of Social Security work incentives and document post-service employment related outcomes.
- **Launching an external marketing campaign targeting transition-age youth with disabilities**, and their families/guardians, educators, advocates, and caseworkers to educate them about the opportunity service learning provides for youth benefit recipients to gain work experience, develop “soft skills,” and establish professional networks without putting their disability benefits at risk.

Recommendations for state policy makers

State Service Commissions should make information available online about the use of Social Security work incentives in AmeriCorps programs for the programs in their states that receive AmeriCorps grants.

If resources permit, state commissions could identify or cultivate a **person or team who would serve as specialists in Social Security disability benefits**.

If income exclusions similar to those currently available to AmeriCorps members were ultimately expand-

ed to other federally funded employment and training programs, **State Workforce Boards should promote their use as a tool to promote positive employment outcomes for youth** and young adult beneficiaries.

Recommendations for schools, educational systems and families

Schools and educational systems should **incorporate volunteerism, national/community service, internships, and other work-based experiences in the curriculum** for all students, including students with disabilities.

Guidance counselors, social workers, and others can **inform students with disabilities that participation in AmeriCorps offers the opportunity to gain work experience with no impact on SSI benefits** (or SSDI benefits for those who enroll in AmeriCorps VISTA). This could be done by:

- **Creating communications materials** to share with students, families, and other caring adults that raise awareness of the AmeriCorps program for youth receiving benefits.
- **Raising awareness of volunteerism and career exploration activities** among all students, including students with disabilities.
- **Incorporating participation in career readiness programs and work-based learning experiences** into Individualized Education Program (IEP) and Individualized Learning Plan (ILP) planning and outcomes.
- **Promoting enrollment in AmeriCorps** as a post-graduation outcome.

Families should also encourage youth participation in national/community service, technical training, and unpaid work experiences along with higher education and/or employment following graduation from high school or completion of an equivalency program.

Introduction

Historically, the employment rate for youth with disabilities has been far below the national average for youth of similar ages without disabilities. In addition to attitudinal barriers and low expectations of employers, fellow workers, and—in some instances family members—research shows that people with disabilities lack access to employment-related supports such as health care, assistive technology, and transportation. The lack of coordination between community-based organizations, special education, vocational rehabilitation, Social Security, and other systems serving youth adds a further barrier to employment.

The Office of Disability Employment Policy (ODEP), an agency within the U.S. Department of Labor (DOL), provides national leadership to increase employment opportunities for adults and youth with disabilities while striving to eliminate barriers to employment. Because of its interest in supporting the successful transition of youth with disabilities into the workplace, this study was conducted to examine the income exclusions available to Social Security beneficiaries participating in AmeriCorps programs as a policy-program model with potential to increase the participation of youth with disabilities through paid work-based experiences in other youth employment and training programs, such as those provided under WIA. Increased participation in work-based learning activities is desirable for youth with disabilities because research shows that such experiences are an important indicator of positive adult employment outcomes.

Within this background paper are summaries of findings from an extensive literature review, interviews with key stakeholders, and an examination of marketing and communication materials used by service providers. Information and guidance is provided for policy-makers, researchers, and program administrators. The paper includes an overview of the importance of work-based experiences in the transition to adult employment for youth with disabilities, study methods, and definitions for terms used.

Importance of Work-Based Experience in the Transition to Employment

Work experiences include both paid and unpaid opportunities to work and to practice career readiness skills. They are a critical component of preparing youth for the transition to adulthood. Community service is included among the on-the-job training experiences identified as necessary to prepare youth for the transition to adulthood by the National Collaborative on Workforce & Disability for Youth (NCWD/Youth) in the *Guideposts for Success*. Work experiences help prepare youth for the transition to adulthood by:

- Developing career readiness skills, including basic work skills (often referred to as “soft skills”), such as attendance, punctuality, teamwork, and conflict resolution;
- Providing knowledge of specific occupational skills;
- Offering opportunities to establish a work history and connections; and
- Providing a forum for exploring different occupations.

Work experiences are beneficial for all youth, including those with disabilities. According to the *Guideposts for Success*, in addition to learning about career options, “youth with disabilities need to do one or more of the following:”

- Understand the relationships between benefits planning and career choices;
- Learn to communicate their disability-related work support and accommodation needs; and
- Learn to find, formally request, and secure appropriate supports and reasonable accommodations in education, training, and employment settings.

Work experiences can take various forms such as internships, summer jobs, youth-run businesses/ entrepreneurship, service projects and volunteer work, and part-time jobs. Even short-term work experiences can be valuable as a way for young people to develop skills, contacts, and awareness about career options.

³ Research indicates that during high school, paid or unpaid work experiences for young teens with disabilities help them acquire jobs at higher wages after they graduate. ⁴

Study Methods

This paper's development required research across a number of systems:

- Department of Labor and the workforce development system for policies, programs, and resources associated with supporting positive transition outcomes of youth with disabilities;
- Social Security Administration for programs, policies, and procedures associated with disability programs and employment supports;
- Corporation for National and Community Service for the structure, operation, policies, and procedures associated with AmeriCorps and the network of programs it funds through competitive grants; and,
- Congressional legislation associated with national service and volunteerism.

Within each system, the study team examined relevant legislation, published studies, and other literature. In-depth interviews were also conducted with experts and selected representatives of each system. A total of 22 interviews occurred involving representatives from federal agencies, state agencies, local organizations, and individual program participants. Every effort was made to ensure the interviews represented a cross-section of states and geographic regions of the

country.

In addition, the study team conducted audits of marketing and communications materials used to promote AmeriCorps programs. This audit included review of Web sites maintained by State Service Commissions and the Web sites of individual grant-recipient programs.

Definitions

Below are definitions of terms used frequently throughout this background paper. Definitions and descriptions for programs typically known by their acronyms (e.g., Supplemental Security Income or SSI) are presented within the paper at the first mention of the program.

Disability: The Social Security Administration defines disability for adults as the inability to engage in any substantial gainful work activity (SGA) because of a medically-determinable physical or mental impairment that is expected to result in death or that has lasted or is expected to last for a continuous period of not less than 12 months.

- For children under 18, the Social Security Administration defines disability as a physical or mental condition(s) that very seriously limits the child's activities, and the condition(s) must have lasted or be expected to last at least one year or result in death.
- Youth aged 18 or older qualify for disability benefits if their impairment or combination of impairments meets the definition of disability for adults and the disability began before age 22.

The Workforce Investment Act (WIA) uses the Americans with Disabilities Act (ADA) definition of disability in its eligibility criteria for disabled youth. The ADA defines disability as a physical or mental

³. National Collaborative on Workforce and Disability, "Engaging Youth in Work Experiences," Practice Brief, Issue 2, September 2011.

⁴. D.A. Colley and D. Jamison, "Post-school results for youth with disabilities: Key indicators and policy implications," Career Development for Exceptional Individuals, 21, 145-160 (1998).

impairment that substantially limits one or more of the major life activities of such individual; a record of such an impairment; or being regarded as having such an impairment.

Service-learning: An approach to education that ties community service to classroom instruction and reflection.

Transition-age youth: Youth between the ages of 14 and 24, including those who are in school and those who are out of school.

Volunteerism: Performance of service-oriented and civic activities for or through an organization, includ-

ing activities that are unpaid and those that offer a stipend or living allowance.

Work-based experiences/work-based learning experiences: Work experiences that are part of a supervised program sponsored by an education or training organization that links knowledge gained at the worksite with a planned program of study.

Workforce development: Employment initiative services offered by agencies and government programs to create sustain and retain a viable workforce. Through workforce development, communities are able to create social and economic stability.



U.S. Department of Labor Youth Landscape

The Workforce Development System and Labor's Youth-Related Programs Under The Workforce Investment Act

The workforce development system is comprised of organizations at the national, state, and local levels that have direct responsibility for planning and allocating public and private resources, providing administrative oversight, and operating programs to assist individuals and employers in obtaining education, training, job placement, and job recruitment. These include:

- Federal agencies charged with providing specific education and/or training support and other labor market services, such as labor market information;
- State and local workforce investment boards; state and local career and technical education and adult education agencies; vocational rehabilitation agencies; state employment and unemployment services agencies; and state and local welfare agencies; and,
- Organizations that provide direct education, training, or employment services, including technical schools, colleges and universities, vocational rehabilitation centers, apprenticeship programs, community-based organizations, America's Job Centers (AJCs), welfare-to-work training programs, literacy programs, Job Corps Centers, unions, and labor management programs.⁵

The Workforce Investment Act (WIA), enacted in

1998, is the cornerstone of the publicly funded workforce development system. WIA provides workforce investment services and activities through local AJCs. The AJC delivery system provides a comprehensive range of services at a single location where adults, veterans, dislocated workers, and youth may receive skills assessment services, information on employment and training opportunities, unemployment services, job search and placement assistance, and up-to-date information on job vacancies. Governance responsibilities for the workforce investment system rest with state and local officials through workforce investment boards.

WIA Youth Services

WIA youth services are available for both in-school and out-of-school youth aged 14 to 21 and youth up to age 24 in programs that received additional funding through the American Recovery and Reinvestment Act of 2009 (ARRA). To be eligible, youth must be low-income⁶ and face one or more of the following barriers:

- Basic skills deficiency;
- School dropout;
- Homeless, a runaway, or a foster child;
- Pregnant teen or teen parent;
- Offender; or,
- Individual who requires additional assistance to complete an educational program or to secure and hold employment.

Even if the family of a youth with a disability does not meet the criteria for income eligibility, a disabled

⁵. "The Right Connections: Navigating the Workforce Development System," National Collaborative on Workforce and Disability Info Brief, Issue 13, February 2005.

⁶. To be considered "low income," an individual must meet one of the following criteria: i) receives public assistance; ii) family income is not above the poverty line, or is 70% of the lower living standard level; iii) is a member of a household that receives food stamps; iv) qualifies as a homeless individual; or v) is a foster child on behalf of whom state or local government payments are made. Source: "The Right Connections: Navigating the Workforce Development System," National Collaborative on Workforce and Disability Info Brief, Issue 13, February 2005.

youth may be considered a “family of one” if the youth’s own income meets the income criteria established in WIA; or meets the income eligibility criteria for cash payments under any federal, state, or local public assistance program.

In addition, up to 5% of the youth served in a local area can be exempted from the low-income requirement if they:

- Experience one or more of the barriers listed above;
- Are one or more grade levels below their age-appropriate grade level;
- Are individuals with disabilities, including learning disabilities; or,
- Face a serious barrier to employment, as identified by the local workforce investment board (WIB).

Programs are available to youth who are in school as well as those who are not. WIA currently requires that 30% of youth funds be used to address the needs of out-of-school youth.⁷ Once enrolled, youth may access any of the 10 program elements that WIA mandates be available in every local area. These include:

- Tutoring, study skills training, and instruction leading to completion of secondary school, including dropout prevention strategies;
- Alternative secondary school services;
- Summer employment opportunities that are directly linked to academic and occupational learning;
- Paid and unpaid work experiences including internships and job shadowing;
- Occupational skills training, as appropriate;
- Leadership development activities, including but not limited to community service and peer-centered activities, which encourage responsibility and other positive social behaviors during non-school hours;

- Supportive services;
- Adult mentoring during program participation;
- Follow-up for at least 12 months after program completion (required for all youth); and,
- Comprehensive guidance and counseling, including drug and alcohol abuse counseling and referral, as appropriate.

While youth can access WIA services in AJCs, more often they receive services in their communities through eligible youth service providers chosen by the local WIB. Local providers must serve younger youth (ages 14–18) and older youth (19–21) and youth who are in and out of school. Local providers must also meet core performance indicators for younger youth including a) attainment of basic skills and, as appropriate, work readiness or occupational skills; b) attainment of secondary school diplomas and their recognized equivalents; and c) placement and retention in postsecondary education, advanced training, military service, employment, or qualified apprenticeships. For older youth, core indicators include: a) entry into unsubsidized employment; b) retention in unsubsidized employment six months after entry into the employment; c) earnings received in unsubsidized employment six months after entry into the employment; and, d) attainment of a recognized credential relating to achievement of educational skills, which may include attainment of a secondary school diploma or its recognized equivalent, or occupational skills, by participants who enter unsubsidized employment or who enter postsecondary education, advanced training or unsubsidized employment

The number of youth exiting WIA programs in early 2012 has increased almost 7% as compared to 2007. Youth with disabilities account for roughly 11% of all exiters (although the incidence is likely higher when accounting for youth who do not disclose a disability or are undiagnosed). During the period, the

⁷ WIA’s definition of “out-of-school youth” includes youth who have dropped out of school as well as youth who have graduated from high school or hold a GED (General Educational Development) but are deficient in basic skills, unemployed, or underemployed. To be defined as “out-of-school,” youth must not be enrolled in school or any alternative education programs when they register for WIA services. However, youth may be placed in an education program (e.g., GED) as part of the service strategy after registration. Source: Ibid.

number of youth who are employed when exiting has declined from roughly 9% to less than 8%.⁸

“In 2011, 1,136,000 youth age 13 to 25 were receiving Supplemental Security Income (SSI) benefits totaling \$8.0 billion (Social Security Administration 2012a). In the same year, 213,000 people age 25 and under were receiving Social Security Disability Insurance (DI) benefits totaling \$1.5 billion.”⁹

While work experiences are beneficial to all youth, they are particularly valuable for youth with disabilities. Research shows that work experiences for youth with disabilities during high school (paid or unpaid) help them acquire jobs at higher wages after they graduate.¹⁰ Despite the potential benefits, WIA youth programs face a number of challenges in providing services to this population. Youth with disabilities and their families may be concerned about losing existing benefits. Due to disability-related disability civil rights laws such as the Rehabilitation Act’s provisions, and other guidelines, WIA program staff must also rely on youth to “self-disclose” information about their status that might impact their ability to participate or require specialized counseling. This includes the nature of their disability, accommodations or supports required, and other government benefits that they may be receiving such as Social Security, Supplemental Nutrition Assistance Program (SNAP), subsidized housing, Medicaid, and others.

Youth Summer Employment Programs

The American Recovery and Reinvestment Act of 2009 included funding for youth activities to serve as one part of the solution to address and reverse the steep decline in youth employment caused by the

“Great Recession.” Through the Recovery Act, states received an additional \$1.2 billion in WIA Youth funding for employment and training activities targeted to disadvantaged youth up to 24 years of age. Congress and the U.S. Department of Labor (DOL) encouraged states and local workforce investment areas charged with implementing youth activities to use the funds to create employment opportunities for these youth in the summer of 2009. Under the Summer Youth Employment Program (SYEP), youth were placed in paid summer employment experiences with local public, nonprofit, and private employers. Their wages were paid with Recovery Act funds.

Jasmine McConnell demonstrated how a summer job can lead to full-time employment. A Minneapolis high school graduate who had completed a year of training in carpentry at her local community and technical college, Jasmine was encouraged by her shop teacher and the “Under Construction” summer program to pursue a profession in the trade. Her supervisors at the Minneapolis Housing Authority were so impressed by her work that they asked the Building and Trades Council to take the unusual step of setting up an apprenticeship. Once Jasmine completes the apprenticeship, she will be a journeyman carpenter.¹¹

Job Corps

Administered by the Department of Labor and authorized under Title I-C of the Workforce Investment Act, Job Corps is the nation’s largest career technical training and education program for young people at least 16 years of age who qualify as low income. Job Corps is primarily a residential training program with a network of campuses at locations across the country. Individuals with disabilities over the age of 24 may be

8. WIA Standardized (WIASRD) data, retrieved from http://www.doleta.gov/performance/results/pdf/py_2011_wiasrd_data_book.pdf.

9. Fraker, Thomas. (2013). The Youth Transition Demonstration: Lifting Employment Barriers for Youth with Disabilities. Issue Brief, 13-01. http://www.mathematica-mpr.com/publications/PDFs/disability/YTD_Brief13-01.pdf.

10. Colley, D.A. & Jamison, D. (1998). Post-school results for youth with disabilities: Key indicators and policy implications. *Career Development for Exceptional Individuals*, 21, 145-160.

11. Retrieved from http://www.positivelyminnesota.com/Programs_Services/Youth_Services/Federal_Recovery_Act_Youth_Program_Information/Success_Stories/City_of_Minneapolis.pdf, March 27, 2012.

allowed to enter Job Corps on a discretionary basis. Job Corps offers hands-on training in more than 100 career technical areas as well as the opportunity to earn a high school diploma or a GED for youth who do not have either. Courses in independent living, employability skills, and social skills are offered to all Job Corps students in order to help them make the transition into the workplace. It utilizes a defined set of core competencies in the fundamental skills students need to secure and maintain employment; standardized systems for data collection, student benefits and accountability; and nationally established performance outcomes and goals. While they seek employment, Job Corps participants receive a living allowance based on stay duration (rate increases with duration of stay) and a transition allowance upon completion of the program (\$250 for a high school diploma or GED; \$750 for CTE; or \$1,200 for completing both).

Antonio Alford is a successful graduate of the Job Corps program. He completed the International Union of Painters and Allied Trades Painting Pre-Apprenticeship Program at the Shriver Job Corps Center in Massachusetts in 2002. Since then, he has traveled throughout the country working on industrial, commercial, and decorative painting projects. Alford is currently foreman of a crew of 20 workers who are restoring the outside of the rotunda beneath the Capitol dome. Reflecting on his Job Corps experience, Alford said, “the very good money and benefits I enjoy as a union painter would not have been possible without the Job Corps program.”

YouthBuild

In YouthBuild programs, low-income youth ages 16 to 24 work full-time for 6 to 24 months toward their GEDs or high school diplomas while learning job skills by building affordable housing in their communities. Emphasis is placed on leadership development, community service, and the creation of a

positive mini-community of adults and youth committed to each other’s success. At exit, youth are placed in college, jobs, or both. The Federal YouthBuild program is authorized under WIA; local community-based YouthBuild programs apply competitively for grants from the Department of Labor.

Tierrah Wells of Peoria, IL said going through the YouthBuild program and receiving her GED helped her land a full-time job as a customer service representative that pays better than the temporary jobs she had been finding.¹²

“YouthBuild made you feel like you had a job, you were looking forward to something new. It’s not just getting up and going to class,” Wells said. “YouthBuild prepared you for the real world.”

The workforce development initiatives funded by WIA demonstrate a shared emphasis on promotion of work readiness through work-based learning opportunities. Paid and unpaid opportunities qualify as work experiences because WIA-funded programs are evaluated based on outcomes that include educational achievement and skill attainment, as well as employment.

13. Social Security Administration, 2012 Red Book.

Employment Supports for Youth with Disabilities under the Social Security Disability Insurance and Supplemental Security Income Programs

Supporting the efforts of beneficiaries with disabilities who want to work is among the highest priorities of the Social Security Administration (SSA).¹³ SSA defines disability as “the inability to engage in any substantial work activity because of a medically-determinable physical or mental impairment(s) that is expected to result in death or that has lasted or is expected to last for a continuous period of not less than 12 months.”

SSA uses the term “substantial gainful activity (SGA)” — also referred to as “substantial work activity” — to describe a level of work activity and earnings. Work is “substantial” if it involves doing significant physical or mental activities or a combination of both. Work activity does not need to be performed on a full-time basis to be considered substantial; work activity performed on a part-time basis also may be considered substantial gainful activity. SSA defines “gainful” work activity as:¹⁴

- Work performed for pay or profit; or
- Work of a nature generally performed for pay or profit; or,
- Work intended for profit, whether or not a profit is realized.

SSA manages two programs that provide benefits based on disability or blindness: the Social Security Disability Insurance (SSDI) program and the Supplemental Security Income (SSI) program. Both cover youth with disabilities, but eligibility rules and determination of benefits payments are different, as shown in the table on the next page.

SSDI provides monthly benefits (from the disability trust fund) for youth aged 18 or older based on disability or blindness if the condition(s) meet the

definition of disability for adults, began before age 22, and are insured under Social Security due to contributions made to FICA based on payroll earnings for themselves, spouses, or parents.

SSI provides monthly payments (from general tax revenues) for individuals who meet SSA’s disability criteria and have limited income and resources. Youth aged 18 and under are eligible but must meet SSA’s definition of disability for children: the child must have a physical or mental condition(s) that very seriously limits his or her activities; and the condition(s) must have lasted, or be expected to last, at least one year or result in death.¹⁵

Both SSDI and SSI include employment support provisions (commonly referred to as work incentives). Congress intended these employment support provisions to provide beneficiaries with assistance to move from benefit dependency to independence.¹⁶ Work incentives that allow youth to maintain benefits while earning income identified by SSA include:

- Impairment-Related Work Expenses (IRWE);
- Plan to Achieve Self-Support (PASS);
- Student-Earned Income Exclusion (SEIE);
- Trial Work Period (TWP);
- Section 301 Continued Payment Protection (covers participation in Ticket to Work, approved vocational rehabilitation agencies, PASS, and individual education programs [IEPs] for individuals aged 18–21); and,
- SSI waivers for participants in Youth Transition Demonstration (YTD) projects.

Ticket to Work is a free and voluntary program for people with disabilities over the age of 18 who want to work and participate in planning their employ-

¹⁴. Social Security Administration, 2012 Red Book.

¹⁵. Social Security Online, Disability Programs, Child Disability Starter Kit—Fact Sheet.

¹⁶. Social Security Administration, 2012 Red Book.

Table 1: Comparison of Social Security Disability Programs

	Social Security Disability Insurance Program (SSDI)	Supplemental Security Income Program (SSI)
Source of payments	Disability trust fund	General tax revenues
Minimum initial qualification requirements	Must meet SSA's disability criteria.¹⁷ Must be "insured" due to contributions made to FICA based on the beneficiary's own payroll earnings or those of their spouse or parents.	Must meet SSA's disability criteria. Must have limited income and resources.
Determination of monthly payments	Monthly payment amounts are based on the worker's lifetime average earnings covered by Social Security. The amount may be reduced if the Workers' Compensation payments and/or public disability benefits are received. The monthly payment amount is adjusted each year to account for cost-of-living changes.	Determination of monthly payment amounts begins with the Federal Benefit Rate (FBR). The beneficiary's countable income (amount that remains after allowable deductions) is subtracted from the FBR, and then any state supplements are added. The FBR is adjusted each year to account for cost-of-living changes.
When benefits stop	If SSA determines that the "disability" ceased due to work at the Substantial Gainful Activity (SGA) level or medical improvement.	If SSA determines that the "disability" ceased due to medical improvement. Benefits may also cease when income or resource tests are not met (e.g., earnings are too high).
When benefits may continue	If SSA ceased disability due to work at the SGA level and then earnings fall below SGA within the extended period of eligibility, or SSA ceased disability due to medical improvement and the beneficiary is participating in a program of vocational rehabilitation or similar services.	If SSA ceased benefits due to medical improvement, benefits may continue if the beneficiary is participating in a program of vocational rehabilitation, employment services, or other support services.

¹⁷ SSA defines disability as the inability to engage in any substantial gainful activity (SGA) because of a medically-determinable physical or mental impairment(s) that is expected to result in death, or that has lasted or is expected to last for a continuous period of at least 12 months (SSA Red Book, 2013).

ment. SSDI and SSI beneficiaries receive a “Ticket” to obtain services from a State Vocational Rehabilitation (VR) agency or private organizations or government agencies that have agreed to work with SSA to provide employment services to beneficiaries with disabilities (known as Employment Networks).

Incentives Related to National Service and Volunteerism

In addition to the work incentives discussed above, work incentives for Social Security disability beneficiaries are available in selected volunteer programs administered by the Federal government. By excluding payments from specific programs when determining income or substantial gainful activity, beneficiaries can participate in national and community service without losing their benefits. Youth with disabilities over the age of 17 who join AmeriCorps are eligible for similar incentives.

Legislative Framework

Work incentives for Social Security disability beneficiaries for volunteer activities date back to the Domestic Volunteer Service Act of 1973. For programs explicitly mentioned in this legislation and the Small Business Act, SSA will not count payments received as earnings when determining whether disability beneficiaries are engaged in substantial gainful activity. Payments may include a minimal stipend; payments for supportive services such as housing, supplies, and equipment; and an expense allowance, or reimbursement of out-of-pocket expenses. Volunteer programs cited include:

- AmeriCorps VISTA (formerly Volunteers in Service to America (VISTA);
- University Year for ACTION;
- Special Volunteer Programs;
- Retired Senior Volunteer Program;
- Foster Grandparent Program;
- Older American Community Services Programs;
- Service Corps of Retired Executives

- (SCORE); and,
- Active Corps of Executives (ACE).

Passage of the National and Community Service Act of 1990 created a new independent federal agency, the Commission on National and Community Service. In 1993, the Commission was incorporated into the National and Community Service Trust Act of 1993. This legislation created the Corporation for National and Community Service (CNCS) with the responsibility to mobilize Americans into service through three programs: Senior Corps, AmeriCorps, and Learn and Serve America.

In 2008, President George W. Bush signed into law the Heroes Earnings Assistance and Relief Tax Act (the HEART Act) to amend the Internal Revenue Code of 1986 to provide benefits for military personnel. The HEART Act also made AmeriCorps more accessible to people with disabilities by directing SSA to exclude AmeriCorps benefits for purposes of SSI eligibility and when calculating monthly payment amounts. This exclusion went into effect for benefits payable after September 1, 2008.

With the passage of the HEART Act, the income exclusion work incentive is now available for SSI beneficiaries across all AmeriCorps programs. As shown in the table below, AmeriCorps VISTA remains the only AmeriCorps program that offers a Social Security work incentive for SSDI beneficiaries.

Table 2: Social Security Work Incentives Available for Americorps Programs

Americorps Program	Beneficiaries of	
	SSI	SSDI
NCCC	✓	
State and Local	✓	
VISTA	✓	✓

In 2009, the late Senator Ted Kennedy (D-MA) and Senator Orrin Hatch (R-UT) introduced Serve America Act legislation to reauthorize and strengthen

en the national service laws. Re-named the Edward M. Kennedy Serve America Act following passage by the Senate, the bill was signed into law by President Barack Obama on April 21, 2009. The Kennedy Serve America Act amends the National and Community Service Act and the Domestic Volunteer Service Act to revise their programs and reauthorizes appropriations through FY2014. The Kennedy Serve America Act also amends the general provisions of the National and Community Service Act to include disadvantaged youth within the National Civilian Community Corps. Disadvantaged youth are defined as youth who are economically disadvantaged and meet one or more of the following criteria:

- Out-of-school youth, including those who are unemployed;
- In or aging out of foster care;
- Have limited English proficiency;
- Homeless or who have run away from home;
- At-risk to leave secondary school without a diploma;
- Former juvenile offenders or at risk of delinquency; or,
- Individuals with disabilities.¹⁸

Other provisions of the Kennedy Serve America Act that apply to AmeriCorps and youth with disabilities include:

- Authorization of new Summer of Service programs under which students in grades 6–12 who complete 100 hours of community-based service learning summer projects become eligible for an educational award of up to \$500. Participants may earn a maximum of two summers of service educational awards;
- Authorization of new Youth Engagement Zone programs to provide competitive grants for partnerships between community-based agencies, states, and local educational agencies (LEAs) that serve high-need areas to engage students and out-of-school youth in ser-

vice-learning;

- Authorization of new Semester of Service programs that allow secondary school students, including a large number or percentage of disadvantaged students, to earn academic credit for a semester of coordinated school-based or community-based service-learning that totals at least 70 hours and addresses specific community challenges;
- Authorization of AmeriCorps programs that:
 - a) expand the number of mentors for disadvantaged and other youths; and b) provide life skills training, employment training, educational assistance, counseling, or a mentoring relationship with an adult volunteer to individuals who are mostly disadvantaged youth;
- Establishment of the requirement for the CNCS to place special emphasis on disadvantaged youth when selecting individuals to receive national service leadership training; and,
- Establishment of eligibility of 18–24 year olds to participate in the National Civilian Community Corps (NCCC; formerly the Civilian Community Corps Demonstration program) and the requirement that the NCCC Director take measures to increase the percentage of program participants who are disadvantaged youth to 50% of all participants by 2012.

Provisions of the Kennedy Serve America Act went into effect on October 1, 2009.

AmeriCorps

Launched in 1993 under the National and Community Service Trust Act, AmeriCorps is a network of service programs that engage Americans to meet the nation's needs in education, public safety, health, and the environment. AmeriCorps members serve at more than 3,000 not-for-profit organizations through three programs.

¹⁸. H.R.1388, The Edward M. Kennedy Serve America Act.

AmeriCorps State and National: The largest of the AmeriCorps programs, AmeriCorps State and National provides funds to local and national organizations and agencies committed to using national service to address critical community needs in education, public safety, health, and the environment. Each of these organizations and agencies uses its AmeriCorps funding to recruit, place, and supervise AmeriCorps members. State commissions distribute two-thirds of AmeriCorps funding to local programs that the state selects; CNCS distributes other funding directly to national programs that operate in more than state, such as Habitat for Humanity, the Boys & Girls Clubs of America, and the American Red Cross.

AmeriCorps VISTA: Incorporating the former VISTA program (Volunteers in Service to America created by President Lyndon Johnson in 1964), AmeriCorps VISTA provides full-time members to not-for-profit, faith-based, and other community organizations, and public agencies to create and expand programs that help bring low-income individuals and communities out of poverty.

AmeriCorps NCCC (National Civilian Community Corps): A full-time, team-based, residential program for men and women ages 18–24, modeled after the Civilian Conservation Corps of the 1930s and the U.S. military, the mission of AmeriCorps NCCC is to strengthen communities and develop leaders through direct team-based national and community service.

Members realize both intangible and tangible benefits from their service to AmeriCorps. Past participants point to the satisfaction of making a difference and serving the country. Members also benefit from development of teamwork, communication, responsibility, and other “soft skills”¹⁹ that can be applied to future employment, as well as the opportunity to

network with AmeriCorps alumni.

Monetary benefits available to AmeriCorps members include a modest living allowance and assistance with college costs and student loans. Some programs also provide housing. Living allowances vary based on the number of hours which members commit to serving and are distributed in equal increments on a monthly basis. The amount of the living allowance for an individual program is tied to the minimum wage in the state where the program operates but usually ranges from \$10,000–\$14,000 for 10–12 months of service.

Members who successfully complete a term of service receive a Segal AmeriCorps Education Award that can be used to pay educational expenses at qualified institutions of higher education, for educational training, or to repay qualified student loans. Members have up to seven years after their term of service has ended to claim the award.¹⁹ (The amount of the education award is currently \$5,550 for full-time service.)

Both the living allowance and the Segal AmeriCorps Education Award are taxable. After the calendar year of service, members receive a W-2 from the organization that they served (or CNCS, in the case of AmeriCorps VISTA and AmeriCorps NCCC members), indicating the amount of allowance earned. Members are responsible for federal income taxes owed.

Eligibility for AmeriCorps varies by program. All programs are open to U.S. citizens, nationals, or lawful permanent residents. AmeriCorps State and National accept members starting at age 17. AmeriCorps NCCC members must be between the ages of 18 and 24. AmeriCorps NCCC also requires relocation and full-time commitment. AmeriCorps VISTA has no minimum age, but most programs seek members with college degrees or at least three years of work experience. AmeriCorps VISTA members are expected to serve full-time for one year.²⁰

¹⁹. “Soft skills” include career readiness skills such as attendance, punctuality, teamwork, and conflict resolution.

²⁰. Benefits for AmeriCorps VISTA vary from other AmeriCorps programs. After successful completion of a term of service, members may receive either the Segal AmeriCorps Education Award or an end-of-service stipend. AmeriCorps VISTA members are also eligible for non-competitive federal jobs for one year after completion of a full year of service.

²¹. Retrieved from http://www.americorps.gov/about/programs/vista_fa_q.asp on March 22, 2012.

Youth with Disabilities and AmeriCorps

CNCS, which oversees AmeriCorps, has a long-standing commitment to disability inclusion and has invested more than \$80 million to engage and support people with disabilities in national service over the last two decades. As of 2010 (the most recent year for which information is available), 35 states formed inclusion teams to make certain that national service programs include the disability community.²²

Eligibility

All prospective participants must meet AmeriCorps' basic citizenship and age guidelines, as well as the eligibility requirements for the programs in which they plan to serve. As Jewel Bazilio-Bellegarde, former CNCS Senior Training Officer for Disability Inclusion, explained in an interview with the study team, it is the program-specific requirements that may limit the participation of youth with disabilities in AmeriCorps.²³ For example, a program may require a driver's license as one of the essential functions of the service position. High school diplomas are not required, and AmeriCorps accepts equivalency certificates. Members who do not have a high school diploma are expected to obtain a diploma (or its equivalent) before using an education award. AmeriCorps also accepts members "who have been determined through an independent assessment by the grantee to be incapable of obtaining a high school diploma or its equivalent."²⁴

Recruiting Youth with Disabilities for AmeriCorps Programs

AmeriCorps is highly decentralized. Prospective participants may apply for membership through the

My AmeriCorps portal on the AmeriCorps Web site at www.AmeriCorps.gov or the toll-free phone number, but recruiting and hiring are handled by the grant recipients.

State Service Commissions, which are commissioned by the state's governor, administer AmeriCorps grants at the state level and serve as leads on national service initiatives. State Service Commissions are responsible for recruitment, outreach, and reasonable accommodations. CNCS in the past provided disability inclusion grants to State Service Commissions and national not-for-profit organizations for outreach and support activities to increase the number of people with disabilities engaged in service for all national service participants. State Service Commissions may have used the funds provided by CNCS to hire a disability coordinator. Grants to the State Service Commissions ended in fiscal year 2012. The Washington Commission for National and Community Service, for example, used a portion of these funds to support the development and production of an AmeriCorps brochure targeted to people with disabilities.

The National Service Inclusion Project (NSIP), a CNCS training and technical assistance provider, has a range of resources to State Service Commissions to support capacity development. Services include onsite training, train-the-trainer programs, sharing of information through email discussion lists, individualized technical assistance, resources addressing service and disability issues, and online education and webinars. NSIP also assists state commissions to develop inclusion teams comprised of national service and disability organizations. NSIP facilitates strategic planning with these state teams to increase the number of and support for persons with disabilities, develop accommodation policies, mitigate barriers posed by benefits, and

22. "CNCS Convenes Leadership Gathering to Increase Disability Inclusion in National Service," CNCS, December 8, 2011.

23. Interview with Jewel Bazilio-Bellegarde, Former Senior Training Officer for Disability Inclusion, Corporation for National and Community Service, December 20, 2011.

24. AmeriCorps Definitions. Retrieved on May 30, 2012 from http://www.americorps.gov/help/2011_Provisions/!SSL!/WebHelp/iv_a_definitions.htm.

ensure program and site accessibility.

The study team canvassed the Internet for information on AmeriCorps programs in all 50 states. Web sites for 14 states specifically mentioned that people with disabilities are eligible to become members; the balance did not. Although the research is not conclusive, the team found only six states that prominently mentioned the HEART Act's benefits: Georgia, Iowa, Indiana, Kentucky, New York, and Utah. These Web sites are exceptional in that they effectively convey information about the income exclusion that is often either miscommunicated or not addressed.

In addition to online marketing, recruiting is publicized locally and to organizations that serve individuals with disabilities. Before the start of the program year (typically September 1), ads are placed in newspapers and information posted "everywhere to get the word out that AmeriCorps is recruiting for participants."²⁵ Information and orientation sessions are held prior to the start of the program year.

WIPA Work Incentives Planning and Assistance (WIPA) projects receive grants from SSA to provide beneficiaries with disabilities (including transition-aged youth over the age of 18) with free access to work incentives planning and assistance, currently have little connection or awareness of AmeriCorps. Dr. Sheila Fesko, Director of National Service to Employment Program (NextSTEP) at the Institute for Community Inclusion, explained, "An individual WIPA only comes across a small number of people per year who actually participate in a service program, so they may not feel the urgent need to become well-versed."²⁶ NSIP has been working with WIPAs for the last few years to connect them with disability coordinators at the state level.

Benefits Counseling for

AmeriCorps Members with Disabilities

If a prospective member satisfies the eligibility requirements, an in-person interview is scheduled with the local grant recipient program. The interview is conducted in the same manner as a standard job interview.

AmeriCorps program staff may use these interviews to discuss benefits and accommodations. Former members confirmed to the study team that specific benefits counseling is not provided to participants with disabilities, and AmeriCorps staff are not aware which members are receiving Social Security disability benefits. As with WIA programs, staff at AmeriCorps programs rely on participants to "self-disclose" their disabilities, to request accommodations, and to identify other government benefits they may be receiving due to disability civil rights laws and other guidelines. Youth with disabilities who disclose may then be put in contact with the disabilities coordinator at the State Service Commission for more information, including accommodations and disability benefits.

AmeriCorps program staff interviewed by the study team said they try to "back in" to determine whether prospective participants are collecting Social Security benefits or may need accommodations. Questions such as "How will the living allowance affect my benefits?" are used as an opening to discuss the SSI work incentive available through the HEART Act. Representatives of the Florida Agency for Persons with Disabilities (APD) said they could not counsel prospective members about what, if any, impact the AmeriCorps living allowance would have on their existing benefits if the members did not "self-disclose." As one APD staffer recalled, "We had people on SSDI who didn't join the program because of the impact on their benefits."²⁷ Training and technical assistance from NSIP are available to programs that receive

²⁵. Interview with David Clark, AmeriCorps Program Director – Green River Area Development District (GRADD), January 16, 2012.

²⁶. Interview with Sheila Fesko, PhD, Director of National Service to Employment Program, at the Institute for Community Inclusion, December 14, 2011.

²⁷. Interview with Melinda Coulter, LeeAnn Herman, and Nancy Hanisch Boutot of the Florida Agency for Persons with Disabilities (APD), January 25, 2012.

grants from CNCS. Director Paula Sotnik states, “We recommend that state commissions and AmeriCorps programs provide all potential and current members with information on disability-related issues, including access, accommodations, and impact on benefits. Even if individuals don’t disclose [the need], providing the same information to all participants helps create a welcoming atmosphere for everyone.” Local affiliates of national-direct AmeriCorps grantees such as the American Red Cross are encouraged to contact head-quarter staff for information needed for applicants with disabilities.

AmeriCorps Accommodation Policy

AmeriCorps participants have the right to reasonable accommodation for disabilities. As shown in the excerpt below from the AmeriCorps Handbook, “Programs must furnish reasonable accommodations for the known physical and mental limitations of qualified AmeriCorps members.”

Purchases associated with accommodations and auxiliary aid equipment are covered by AmeriCorps grant funds (see Appendix). Other examples of approved uses of grant funds include:

- Partnering with disability organizations to develop action plans that result in increases in referrals, member applications, and member support strategies;
- Engaging disability inclusion experts to review and provide feedback on existing recruitment, outreach, and programmatic materials on inclusions and accessibility;
- Developing materials in alternative formats; and,
- Payment for a disability coordinator, disability inclusion expert consultant, or contractor (which may be a disability-related organization) to assist with outreach, recruitment, and training and technical assistance on disability inclusion issues, including reasonable accommodation, and retention.



Implementation of Social Security Work Incentives within AmeriCorps

History

The debate about how to treat the living allowance for the determination of Social Security disability payments and eligibility dates back to the launch of AmeriCorps in 1993. The DVSA of 1973 established Social Security work incentives for volunteerism for SSDI beneficiaries. Within AmeriCorps, the work incentive applied only to the VISTA program. No similar work incentive existed for SSI beneficiaries. The inconsistency came to the attention of Representative Jim McDermott (D-WA), a member of the House Ways and Means Committee, who sought technical assistance from the CNCS to include work incentives for SSI beneficiaries in the legislation that would become the HEART Act.

Previously, according to Bill Basl, Executive Director, Washington Commission on National and Community Service, individuals with disabilities were encouraged by AmeriCorps staff, local counselors, and others to participate in the AmeriCorps programs with a “wink and a nudge” and assured that there was little likelihood that their extra income would be noticed. In some SSA field offices, the determination was made to allow AmeriCorps members to retain the living allowance. Other field offices viewed the living allowance more narrowly. Where SSA determined that the living allowance should be counted as earned income, the penalties could be severe. As Basl observed, “It was really pathetic that a wheelchair-bound member who lived out in a rural area ended up being severely penalized for receiving benefits as well as his living allowance from AmeriCorps.”²⁸

Lanny Taulbee, Disabilities Coordinator, Kentucky Commission on Community Volunteerism,

described the case of a woman with a disability who was required to pay \$8,000 in 30 days when SSA determined that she had “earned too much income” from the AmeriCorps living allowance, putting her over the SGA earnings limit.²⁹ Taulbee recalls telling a former CNCS Chief Executive Officer that he needed to emphasize to Congress that people with disabilities would continue to be excluded from the workforce and the broader community if disability inclusion funds were eliminated.³⁰

SSA supported legislative efforts to establish consistent treatment of the living allowance and recognized that the income exclusion would make AmeriCorps more accessible to people with disabilities:

...We also support legislation that would exclude the AmeriCorps State and National and AmeriCorps National Civilian Community Corps program payments for purposes of determining SSI eligibility and benefit amounts. Stipends for AmeriCorps VISTA volunteers are currently excluded from income for SSI purposes under the 1973 authorization for this program, the Domestic Volunteer Service Act. However, authorizing legislation for the newer AmeriCorps programs, does not exclude stipends for SSI purposes. These payments are counted as earnings in the SSI program, and room and board provided under the new programs is counted as in-kind support and maintenance. The earnings received based on these newer AmeriCorps programs are also taxable, and earn Social Security (OASDI) quarters of coverage. All three AmeriCorps programs have similar missions, and volunteers in these programs that

²⁸. Interview with William C. Basl, former Executive Director, Washington Commission on National and Community Service, December 23, 2011.

²⁹. Interview with Lanny Taulbee, Disabilities Coordinator, Kentucky Commission on Community Volunteerism and Service, December 27, 2011. According to Taulbee, the beneficiary has been living in an assisted living facility with reduced benefits for more than 10 years due to the recapture of the overpayment.

³⁰. Ibid.

receive a living allowance can receive a separate educational award upon completion of public service. Thus, we currently have individuals performing similar volunteer work and participating in similar programs who are being treated differently. SSA supports the proposed legislation. Expanding the earning exclusions to participants in the other two programs would provide equity for our beneficiaries, administrative simplification, and presumably enable AmeriCorps to enroll more participants with disabilities.—*Statement of David A. Rust, Acting Deputy Commissioner for Disability and Income Security Programs, Social Security Administration. Testimony before the House Committee on Ways and Means, Subcommittees on Select Revenue Measures and Income Security and Family Support, October 17, 2007*³¹

Current Policy

Passage of the HEART Act in 2008 removed a significant barrier to participation in national service and community volunteerism for people with disabilities. By directing SSA to exclude AmeriCorps benefits for the purposes of SSI eligibility and when calculating monthly payment amounts, the HEART Act enables SSI beneficiaries to realize the professional development and leadership opportunities available through AmeriCorps without risk of penalty or loss of benefits. As former CNCS General Counsel Frank Trinity stated, “The HEART Act was about veterans and we helped make it into something more.” Previously, he said, “The SSI issue wasn’t getting any traction.”³²

Current SSA procedures for treatment of the AmeriCorps living allowance for SSDI and SSI beneficiaries are available in the Program Operations Manual System (POMS). For SSDI beneficiaries, minimal stipends, payment for supportive services (e.g., housing, supplies, and equipment), an expense allowance, and/or reimbursement of out-of-pocket expenses from AmeriCorps VISTA are not to be evaluated for

the purpose of determining SGA or TWP. Cash or in-kind payments provided by AmeriCorps State and National or AmeriCorps NCCC are excluded from income for SSI purposes even if they meet the definition of wages. Payments include but are not limited to living allowance payments; stipends; food and shelter; clothing allowance; educational awards; and payments in lieu of educational awards.

Implementation

As with participants in WIA-funded programs, AmeriCorps members can be involved in multiple social welfare systems such as Social Security, the Department of Agriculture’s Supplemental Nutrition Assistance Program (SNAP) program, the Department of Housing’s Section 8 Housing Assistance Programs, and others. Each system treats the AmeriCorps living allowance differently for the purposes of eligibility and benefits. Staff at AmeriCorps grant programs are not expected to counsel members about how the living allowance affects their benefits; members are encouraged to consult their own benefits counselors.

According to NextSTEP Director Dr. Sheila Fesko, “Some of the larger AmeriCorps granted programs are sophisticated and would know SSI benefits are not affected. But a small local program may not.” An AmeriCorps program director in Florida told the study team that they include an “income clarification letter” in the orientation packet that they distribute to members. The letter details how the AmeriCorps living allowance should be treated for food stamp eligibility. The program does not have a comparable letter for Social Security disability benefits. The Florida Agency for Persons with Disabilities relied on experience with other grants to guide the operations of its AmeriCorps program, as it was unable to obtain guidance about how members should report income for tax purposes or Social Security disability benefits.

Only AmeriCorps VISTA provides guidance to members regarding interaction of the living allowance with public assistance benefits. Information is pro-

³¹. Social Security Testimony before Congress, retrieved from http://www.ssa.gov/legislation/testimony_101707.html.

³². Interview with Frank Trinity, former General Counsel for the Corporation for National and Community Service, January 18, 2012.

vided for Social Security disability programs, as well as the Department of Agriculture's Food Stamp and Women, Infants, and Children (WIC) programs. A former participant told the study team that this disclosure was "the main reason" that she chose the AmeriCorps VISTA program. The study team reviewed the NCCC Member Handbook and the *Getting Started Handbook* used for AmeriCorps State and National and found no similar references.

SSA expects beneficiaries to report changes in work activity that could affect benefits. Yet senior SSA staff interviewed by the study team were not aware of the HEART Act and the income exclusion available to AmeriCorps participants. The work incentives available for volunteer programs are not included in Social Security's *Red Book*, the summary guide for employment supports for persons with disabilities used by educators, advocates, rehabilitation professionals and counselors, as well as applicants and beneficiaries.

At the local level, "new rules are being promulgated in the POMS every week so field representatives are bombarded and can't keep up," Lucy Axton Miller, Technical Assistance Liaison at Virginia Commonwealth University (the WIPA National Training Center) told the study team.³³

NSIP Director Sotnik advises current and prospective AmeriCorps members who are receiving Social Security disability benefits to "go to SSA with their POMS in their hand."³⁴ A former AmeriCorps member and SSDI beneficiary, who describes herself as a "self-advocate," said she went even further and brought her VR specialist to meet her AmeriCorps supervisor to ensure that the accommodations and support she needed would be available.

The AmeriCorps term of service for full-time members ranges from 10 months to 12 months. Part-time options are also available. Programs typically run from September 1 to August 30 and participants eligible for the living allowance are paid on a weekly or bi-weekly basis. For SSI beneficiaries, there is no change in benefits after completing their term of ser-

vice because of the income exclusion established by the HEART Act. However, SSI beneficiaries must report receipt of the AmeriCorps stipend to SSA. Employment counselors stress the importance of reporting wages to SSA, noting that failure to report is often a factor in discontinuation of benefits. Counselors interviewed by the study team recommend that SSI beneficiaries participating in AmeriCorps programs inform SSA about the HEART Act in their monthly report to ensure the living allowance is excluded from countable income for the purposes of determining their SSI payment.

The situation is more complicated for SSDI beneficiaries. With no income exclusion for participation in programs other than AmeriCorps VISTA, the AmeriCorps living allowance counts toward the Trial Work Period and Substantial Gainful Activity, which are calculated on a monthly basis. Specialists in SSA policies interviewed by the study team confirmed that beneficiaries may be contacted years later for repayment if SSA determines they were not eligible for SSDI payments in a given month or months.

Outcomes for AmeriCorps Members with Disabilities after Completion of Service

Procedures and practices at the end of service vary by AmeriCorps program. Most programs offer seminars and workshops to help with professional and "life skills" such as budgeting. Networking opportunities are also provided. As an AmeriCorps program director explained, "We do help them plan for life after AmeriCorps."³⁵ The *Getting Started Handbook* includes a section entitled "Life After AmeriCorps."

AmeriCorps replaced its "What's Next: Life After AmeriCorps" handbook with an online tutorial entitled "What's Next: Life After Your Service Year" to help members plan for transitions after their service term. The tutorial provides information about attend-

³³. Interview with Lucy Axton Miller, Technical Assistance Liaison, Virginia Commonwealth University, January 13, 2012.

³⁴. Interview with Paula Sotnik, Director, National Service Inclusion Project (NSIP), January 5, 2012.

³⁵. Interview with Ruth Spencer, AmeriCorps Program Director, Girl Scouts of Gateway Council, January 13, 2012.

ing school, establishing a career, and continuing in service. The tutorial also provides tools to help members plan their transition, assess skills and accomplishments, and identify resources and strategies to take the next steps.

Grant recipients are expected to measure their performance against AmeriCorps' national performance priorities. For 2012, these include disaster services, education, capacity building, economic opportunity, environmental stewardship, healthy futures, and veterans and military families. AmeriCorps does not conduct post-service measurement for its members. If post-service outcomes were evaluated, the assessment would likely be conducted at the grant recipient program level. As an AmeriCorps program director in Kentucky told the study team, "We are up to our eyeballs with current participants so we don't have much time for tracking alumni."³⁶

While no quantitative data is currently available to evaluate outcomes for transition-age members with disabilities, stories of service for AmeriCorps members with disabilities are presented on the AmeriCorps Web site at www.AmeriCorps.gov and the CNCS Web site at www.NationalService.gov. The study team conducted interviews with three former AmeriCorps members who identified themselves as persons with disabilities. All three credit their AmeriCorps experience with helping to secure paid employment.

"If it wasn't for AmeriCorps supporting me in my goal to become an Indiana Certified Recovery Specialist (CRS), I would not have achieved that important milestone. When my year of service was over, it was because of being a CRS and my skills and knowledge from national service that I was able to apply for and be successful in winning a \$50,000 Consumer Operated Grant from the

Indiana Division of Mental Health and Addiction to fund the Rockport Engagement Center."—Jennifer B., SSDI beneficiary who served in AmeriCorps from 2009–10 and subsequently secured a grant to establish a behavioral health center in her community³⁷

"I was an AmeriCorps [member] par excellence and my AmeriCorps experience definitely helped me get the job."—Oyo F., AmeriCorps alumnus, who secured a position as an instructional assistant in special education in the school district where she had been serving³⁸

"I definitely feel that my work experience with AmeriCorps was the reason that I got the job so quickly. Besides gaining valuable experience, I liked working in an environment that appreciated that I was volunteering."—Andraéa L., SSI beneficiary who participated in AmeriCorps VISTA from 2006–07 and secured employment with a national not-for-profit³⁹

Stakeholders in numerous systems recognize that volunteer and service programs such as AmeriCorps offer the career preparation experiences that youth need to transition to adulthood successfully. Lucy Axton Miller, Technical Assistance Liaison at the WIPA National Training Center, describes AmeriCorps as "a really good bridging activity."⁴⁰ APD's Provider Training and Client Legal Rights Champion Melinda Coulter concurs, "Volunteerism absolutely provides a pathway to employment."⁴¹ Patty Oser, Vice President of Community Services for an authorized SSA Employment Network, goes further, stating, "Volunteerism is a very good path to employment – just like education."⁴²

A 2011 national evaluation of youth corps pro-

³⁶. Interview with David Clark, AmeriCorps Program Director – Green River Area Development District (GRADD), January 16, 2012.

³⁷. Interview with Jennifer Byerly, Rockport (IN) Engagement Center, January 5, 2012.

³⁸. Interview with Oyo Fummilayo, January 6, 2012.

³⁹. Interview with Andraéa LaVant, Inclusion Specialist, Girl Scout Council of the Nation's Capital, December 8, 2011.

⁴⁰. Interview with Lucy Axton Miller, Technical Assistance Liaison, Virginia Commonwealth University, January 13, 2012.

⁴¹. Interview with Melinda Coulter, LeeAnn Herman, and Nancy Hanisch Boutot of the Florida Agency for Persons with Disabilities (APD), January 25, 2012.

grams operated by local community-based organizations and local and state government agencies found no statistically significant impact on employment or enrollment in school. However, the study authors see promise in the finding that enrollment in youth corps boosted the income and average hourly wage of members, at least temporarily, after assignment.⁴³ NSIP Director Paula Sotnik confirmed that “NextSTEP will produce documentation in the next two years to prove that AmeriCorps is a pathway to employment.”⁴⁴

CNCS launched the Engaging Veterans with Disabilities Initiative in 2010 to enhance the capacity of national service programs to successfully recruit, engage, and support veterans with disabilities as active service members in structured volunteer experiences. The CNCS initiative conducted interviews and discussion groups with veterans about their experiences as members of AmeriCorps to identify best practices for recruiting veterans for CNCS programs supporting veterans in service. The findings and related report identified themes to enhance recruitment, including:

- “Appeal to what will interest a vet with disabilities—present physical and non-physical jobs for them to do and how these positions will re-empower and re-engage them in their lives”;
- “List the stipend and benefits, including the educational benefits and its value. Discuss the relationship to the GI Bill and do this up-front”;
- “Desire to transition (personally and professionally)”: Veterans repeatedly mentioned the appeal of finding a venue to transition from military life to civilian life. For some, this transition included a transition into new employment options; others seemed to be searching for transition in their personal lives”; and,
- “Search for new opportunities and sense of accomplishment”: The opportunity to have a purpose, goal, or mission resonated with the veterans who participated in the study. A veteran who is disabled said that volunteering

would “open up the opportunities, but it also opens up opportunities to the right people. Like right now I’m disabled, so there’s a lot of things I can’t really do. [But] once you have a purpose to get out of bed, get off the couch and what not, it’s a whole different story.”⁴⁵

The study concluded that clearly defining how AmeriCorps service would interact with other benefits that veterans receive—either positive or negatively—was of utmost importance to veterans.

Service as a Pathway to Employment

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⁴². Interview with Patty Oser, Vice President of Community Services, Southern Indiana Resource Solutions (SIRS), January 18, 2012.

⁴³. Price, C., Williams, J., Simpson, L., Jastrzab, J., Markovitz, C., “National Evaluation of Youth Corps: Findings at Follow-up,” Abt Associates Inc., June 2011..

of national service programs to successfully recruit, engage, and support veterans with disabilities as active service members in structured volunteer experiences. The CNCS initiative conducted interviews and discussion groups with veterans about their experiences as members of AmeriCorps to identify best practices for recruiting veterans for CNCS programs supporting veterans in service. The findings and related report identified themes to enhance recruitment, including:

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Hurdles to Using Social Security Work Incentives to Promote Volunteerism as a Pathway to Employment

In practice, information about the treatment of AmeriCorps benefits for the purposes of Social Security disability benefits is not communicated clearly or consistently. Executives interviewed by the study team at AmeriCorps’ national office said though they were aware of the HEART Act, they believed that staff within CNCS may not be similarly aware of this legislation. Staff at AmeriCorps grant programs are encouraged to direct questions related to public assistance benefits to State Service Commissions. Moreover, in an effort to utilize interviewing and selections techniques that are inclusive, staff refrain from discussing information about disabilities, accommodations required, or government benefits unless the issues are raised by the member or potential member.

The work incentives available for AmeriCorps programs are also not well known within SSA. A staff director in SSA’s Office of Legislation and Congressional Affairs (OLCA) told the study team that he was not familiar with the HEART Act legislation or its benefit to AmeriCorps programs. A change to the POMS such as the HEART Act would be included in the alerts that SSA sends to field offices via the SSA Intranet, which are issued frequently and contain numerous references.

In addition, SSA field officers must prioritize a number of needs. A former senior manager in the Office of Employment Support Programs, described the situation eloquently:

“In all honesty, it is very difficult for a field person to keep up with all the relevant rules. 99% are overwhelmed and too busy processing claims that give people the necessities they need like food, housing, and clothing.”⁴⁶

44. Interview with Paula Sotnik, Director, National Service Inclusion Project (NSIP), January 5, 2012.

45. Engaging Veterans with Disabilities in National and Community Service Initiative, “Comprehensive Report,” Corporation for National and Community Service, November 2011.

46. Interview with Marie Strahan, Former Special Advisor to Associate Commissioner Bob Williams, Office of Employment Support Programs (OSEP), Social Security Administration, December 6, 2011.

Community Work Incentive Counselors (CWICs) working under contract to WIPAs have not been reliable resources for information about work incentives for volunteer and service programs. CWICs do not have access to the internal SSA database and also have difficulty staying up to date. Changes to the POMS are posted weekly on the SSA Web site. CWICs monitor these listings and communicate updates to their networks.

Despite the income exclusions available to SSI beneficiaries for participation in AmeriCorps programs and exclusions available to SSDI beneficiaries for AmeriCorps VISTA and other volunteer programs, the requirements of Ticket to Work and other SSA employment supports effectively limit the use of these work incentives. A Vice President at an SSA-authorized EN with over 30 years experience in the field said, “our EN group would probably tell a client that we could not support their decision to volunteer for AmeriCorps” because volunteer service, by SSA standards, does not qualify as gainful employment.⁴⁷ SSA’s decentralized structure also hampers consistent use of the income exclusion. Determinations are made at the regional level and income disregarded in one of SSA’s 10 regions might be counted in another.

“According to WIPA Technical Assistance Liaison Lucy Axton Miller, SSA is encouraging CWICs to reach out to transition-age youth and their families to explain that the youth can work and receive benefits. Yet schools, she explains, which are “the primary attachment for transition age youth,” are not well informed about Social Security programs because they are considered “adult benefits.” Miller added, “Schools do not refer kids to WIPA programs.”⁴⁸

Disincentives” exist in other systems as well. State VR agencies emphasize “case closures” that result in paid employment. Factors used by VR to determine whether participation in a program constitutes a

successful closure include assessment of the “position” as appropriate for the individual, the rate of pay, and whether that particular state accepts the “position” as his/her employment outcome.

Finally, Social Security disability beneficiaries themselves may be reluctant to participate in compensated programs to avoid losing or reducing their benefits. As the CNCS Engaging Veterans with Disabilities in National and Community Service Initiative reported, “It is clear that it is highly unlikely that a Veteran would choose to serve in AmeriCorps if to do so would negatively impact the benefits that a veteran is presently receiving.”⁴⁹ An AmeriCorps alumna echoed these concerns in an interview with the study team, “It’s difficult to juggle working and training to avoid having your benefits cut off. It’s very scary.”

Concerns are particularly acute for SSDI beneficiaries, for whom the income exclusion is only available for AmeriCorps VISTA. Whether the AmeriCorps living allowance would disrupt the Veterans Administration (VA) disability insurance or SSDI was a source of confusion for veterans. According to the Initiative’s comprehensive report, serious concerns arose when the issue of SSDI benefits was involved. As one veteran noted, “It’s not so much the VA. It’s the SSDI.”⁵⁰ Unlike SSI, which is means-tested and payments fluctuate based on the recipient’s countable income, SSDI is “all or nothing,” and monthly payments are based on the worker’s lifetime average earnings covered by Social Security. In the words of Kentucky Disabilities Coordinator Lanny Taulbee, “The SSDI system is somewhat of a disincentive to work because recipients will try to keep their income below SGA level.”⁵¹ Individuals may be eligible for concurrent disability benefits under both the SSI and SSDI programs, each with distinct and sometimes conflicting regulations.

⁴⁷. Interview with Patty Oser, Vice President of Community Services, Southern Indiana Resource Solutions (SIRS), January 18, 2012.

⁴⁸. Interview with Lucy Axton Miller, Technical Assistance Liaison, Virginia Commonwealth University, January 13, 2012.

⁴⁹. Engaging Veterans with Disabilities in National and Community Service Initiative, “Comprehensive Report,” Corporation for National and Community Service, November 2011.

⁵⁰. Ibid.

⁵¹. Interview with Lanny Taulbee, Disabilities Coordinator, Kentucky Commission on Community Volunteerism and Service, December 27, 2011.

Exploring the Potential for Use of Social Security Income Exclusions to Beneficiaries Participating in Other Youth-Focused Employment and Training Programs Such as WIA Programs

The expansion of Social Security income exclusions similar to those currently available under the HEART Act to other youth-focused employment and training programs serving transition-age youth such as WIA Youth Programs has the potential to increase participation by and improve employment outcomes for youth disability beneficiaries. Research has shown that younger beneficiaries are more likely to work and ultimately forgo receiving benefits when exposed to work-based opportunities.

Accomplishing this, however, would obviously require legislative action. Sources interviewed by the study team viewed this paradigm shift as unlikely, unless it could be attached to a larger coalition or broader legislation, as the SSI income exclusion was in the HEART Act.

Evidence from a pilot demonstration showing that the long-term benefits of such work incentives exceed costs would be central to gaining support for any legislation. As Trinity explained, when pursuing the SSI income exclusion, the agency made the case that if a certain percentage of AmeriCorps members “stayed on for paid employment after their year of service, the government would ultimately save money because anyone receiving benefits would no longer need them.” In the HEART Act Cost Estimate, the Congressional Budget Office determined that the incremental cost of excluding the AmeriCorps living allowance from calculation of SSI eligibility and benefit amounts was just \$9 million.⁵³

Several of the barriers to eligibility for Amer-

iCorps programs faced by youth with disabilities, however, are also present for WIA programs. The decentralized structure of AmeriCorps and its grant programs inhibits the exchange of information and establishment of best practices for benefits counseling, outreach, and program improvement. WIA youth programs also vary greatly at the local level, however the adherence to standardized performance measures enables WIA youth programs to track progress in a more systemized way.

Job Corps, the nation’s largest career technical training and education program for young people at least 16 years of age who qualify as low income, also utilizes a defined set of core competences in the fundamental skills students need to secure and maintain employment; standardized systems for data collection, student benefits and accountability; and nationally established performance outcomes and goals.

While AmeriCorps programs are required to complete exit forms for their participants, follow up with alumni participants occurs on a grantee by grantee basis. AmeriCorps differs from WIA programs in that it does not currently track post-service outcomes for its corps members. This gap may be filled in the coming years as the Kennedy Serve America Act directs the Government Accountability Office (GAO) to develop performance measures for each national service program and to make an assessment every five years. The legislation also includes authorization for a 10-year longitudinal study on the benefits/impact of service-learning programs.⁵⁴

⁵². Ben-Shalom, Y., Stapelton, D., Phelps, D., & Bardos, M. “Longitudinal Statistics for New Supplemental Security Income Beneficiaries.” Mathematica Center for Studying Disability Policy. Retrieved from http://mathematica-mpr.com/publications/pdfs/disability/SSI_Cohort_fnlrrpt.pdf

⁵³. Congressional Budget Office Cost Estimate, H.R. 6801 Heroes Earnings Assistance and Relief Tax Act of 2008, May 29, 2008. Retrieved on May 18, 2012 from <http://www.cbo.gov/sites/default/files/cbofiles/ftpdocs/93xx/doc9328/hr6081.pdf>.

⁵⁴. “Overview of the Edward M. Kennedy Serve America Act of 2009”, Corporation for National and Community Service, retrieved from http://www.nationalservice.gov/pdf/09_0421_serveact_summary.pdf

Existing studies, such as the National Evaluation of Youth Corps, indicate that the combination of community service, workforce development, and education has lasting benefits. The Comprehensive Report of the CNCS Engaging Veterans with Disabilities in National and Community Service Initiative also finds that a period of national service affords veterans the opportunity to explore career paths while considering their next step in life. CNCS recently released a report titled “Volunteerism as a Pathway to Employment.” The report provides empirical evidence that establishes

a connection between volunteering and employment and highlighted data showing that volunteerism improves employment outcomes for populations that experience significant barriers in the job market, such as individuals who do not have a high school diploma. Further, CNCS and the Social Security Administration have recently entered a data sharing agreement that will facilitate easier tracking and data collection concerning service corps members who receive benefits.



Conclusion and Recommendations

The possible expansion of Social Security income exclusions similar to those currently available under the HEART Act to other youth focused employment and training programs serving transition-aged youth such as WIA has the potential to increase participation by and improve employment outcomes for youth beneficiaries' disability beneficiaries. Research indicates that paid or unpaid work experiences for young teens with disabilities help them acquire jobs at higher wages after they graduate.

In addition, community service is listed among the on-the-job training experiences identified as necessary to prepare youth for transition to adulthood by the National Collaborative on Workforce & Disability for Youth (NCWD/Youth) in the *Guideposts for Success*. AmeriCorps service, like other work based learning experiences also offers other work-related experiences the *Guideposts for Success* identify as important including:

- Opportunities to engage in a range of work-based exploration activities;
- Opportunities to learn and practice their work skills; and,
- Opportunities to learn first-hand about specific occupational skills related to a career pathway.

In addition, the AmeriCorps model also offers other experiences that the *Guideposts for Success* say youth with disabilities need including the opportunity to:

- Understand the relationship between benefits planning and career choices;
- Learn to communicate disability-related work support and accommodation needs; and,
- Learn to find, formally request, and secure appropriate supports and reasonable accommodations in education, training, and employment settings.

Recommendations

Collaboration among policy makers at the federal and state level is needed to strengthen and increase utilization of the income exemption currently available under AmeriCorps model and to develop a framework for the possible expansion of the use of such work incentives in other youth employment and training programs such as those funded under WIA. Below are five sets of recommendations for stakeholders interested in facilitating successful employment transitions for youth with disabilities who are Social Security benefit recipients.

Recommendations for federal policy makers

Build on the foundations established by the Domestic Volunteer Service Act of 1973, the HEART Act of 2008, and the Kennedy Serve America Act of 2009 by supporting a pilot demonstration project as a precursor to the possible enactment of legislation that would allow transition-age youth receiving Social Security benefits to take advantage of paid time-limited career development experiences in other federally funded employment and training programs without risking a loss of benefits as a pathway to employment. The reauthorizations of WIA, the Elementary and Secondary Education Act, etc., may provide an appropriate forums.

Consider expanding the existing work incentives

available to Social Security SSI beneficiaries participating in AmeriCorps programs to all Social Security beneficiaries.

Recommendations for the Office of Disability Employment Policy and the Department of Labor

Consider working with the Veterans Administration and the Veterans Employment and Training Service to pursue legislation that would allow Social Security

beneficiaries to participate in work-based learning experiences without fear of losing their benefits.

Recommendations for the Social Security Administration

Issue policy guidance which discusses the income exclusions for service learning currently available under AmeriCorps and promotes their use as an important strategy for moving beneficiaries from dependency to employment.

Consider expanding the income exclusion available under AmeriCorps to other federally funded employment and training programs to promote work-based learning because of the opportunities it provides for the development of work-related skills and the correlation that exists between paid work experience for youth with disabilities and successful adult employment outcomes.

Launch a far-reaching communications campaign to educate employees and beneficiaries in the SSA system about the work incentives available for Social Security disability beneficiaries who participate in service-learning, volunteer programs, and other work-based learning experiences. Elements of such a campaign could include the following:

- **Preparing an electronic postcard** that can be sent to SSDI and SSI beneficiaries promoting work-based learning experiences, including volunteerism, as a bridge to development of career skills and work experiences; and
- **Customizing a campaign to increase awareness** among state Vocational Rehabilitation/ Rehabilitation Services Administrations, American Job Centers, and other workforce development stakeholders.
- **Providing training to SSA representatives** in field offices, as well as to AWICS, and WIPAs to establish best practices for advising Social Security disability beneficiaries about the opportunity to develop skills and work experience through participation in service and volunteer

programs. “Specialists” in employment supports for volunteer and service programs should be identified in each SSA region where possible.

Recommendations for CNCS

Increase awareness among AmeriCorps’ grantees and State Service Commissions that the AmeriCorps living allowance is excluded from income calculations for SSI beneficiaries and SSDI beneficiaries participating in AmeriCorps VISTA. This could be addressed through the following:

- **Implement a communications campaign** targeted at CNCS departments, State Service Commissions, and national not-for-profit organizations to build awareness of Social Security work incentives to encourage people with disabilities to enroll in AmeriCorps
- **Develop a fact sheet** detailing how the AmeriCorps’ living allowance is treated for Social Security disability programs that can be downloaded by AmeriCorps programs and State Service Commissions from the AmeriCorps Web site; and
- **Prepare materials and training curriculum** to educate staff at State Service Commissions about Social Security disability benefits to encourage utilization of existing work incentives and minimize confusion and concern for beneficiaries. Materials could include templates that AmeriCorps grant recipients and participants can download from the Internet for use for communication with SSA.

CNCS could also support greater utilization of the existing Social Security work incentives to promote volunteerism as a pathway to employment by:

- **Modification of the AmeriCorps application form and intake guides** used by grant recipients to collect data about participants who are receiving Social Security disability benefits (while maintaining compliance with the ADA and Section 504 of the Rehabilitation Act of 1973). This would help establish a baseline for

performance measures to evaluate outcomes for AmeriCorps members with disabilities.

- Ensuring that as the GAO moves forward in developing performance measures for each national service program, these metrics include the use of Social Security work incentives and document post-service employment related outcomes.
- Launching an external marketing campaign targeting transition-age youth with disabilities, and their families/guardians, educators, advocates, and caseworkers to educate them about the opportunity service learning provides for youth benefit recipients to gain work experience, develop “soft skills,” and establish professional networks without putting their disability benefits at risk.

Recommendations for state policy makers

State Service Commissions should make information available online about the use of Social Security work incentives in AmeriCorps programs for the programs in their states that receive AmeriCorps grants.

If resources permit, state commissions could identify or cultivate a **person or team who would serve as specialists in Social Security disability benefits.**

If income exclusions similar to those currently available to AmeriCorps members were ultimately expanded to other federally funded employment and training programs, **State Workforce Boards should promote their use as a tool to promote positive employment outcomes for youth** and young adult beneficiaries.

Recommendations for schools, educational systems and families

Schools and educational systems should **incorporate volunteerism, national/community service, internships, and other work-based experiences in the curriculum** for all students, including students with disabilities.

Guidance counselors, social workers, and others can **inform students with disabilities that participation in AmeriCorps offers the opportunity to gain work experience with no impact on SSI benefits** (or SSDI benefits for those who enroll in AmeriCorps VISTA). This could be done by:

- **Creating communications materials** to share with students, families, and other caring adults that raise awareness of the AmeriCorps program for youth receiving benefits.
- **Raising awareness of volunteerism and career exploration activities** among all students, including students with disabilities.
- **Incorporating participation in career readiness programs and work-based learning experiences** into Individualized Education Program (IEP) and Individualized Learning Plan (ILP) planning and outcomes.
- **Promoting enrollment in AmeriCorps** as a post-graduation outcome.

Families should also encourage youth participation in national/community service, technical training, and unpaid work experiences along with higher education and/or employment following graduation from high school or completion of an equivalency program.

Stakeholders, including Social Security disability beneficiaries themselves, recognize the positive outcomes of participation in these programs. As one AmeriCorps alumna said, “At the end of the program, a disabled person can feel that they are giving services instead of just receiving them.” Former Washington Commission on National and Community Service Executive Director Bill Basl advocates that “what people with disabilities really need is to feel useful, self-sufficient, and to be able to contribute.”



National Collaborative on Workforce & Disability/Youth

c/o Institute for Educational Leadership
4301 Connecticut Avenue, NW, Suite 100

Washington, DC 20008

1-877-871-0744 (toll free)

1-877871-0665 (TTY toll free)

contact@ncwd-youth.info

Twitter: [ncwdyouth_iel](https://twitter.com/ncwdyouth_iel)

www.ncwd-youth.info