



LEAD CENTER

POLICY BRIEF

The ABLE Act and Employment: *Maximizing the Effectiveness of the Achieving a Better Life Experience (ABLE) Act as a Tool for Increasing Financial Stability and Employment Outcomes of People with Disabilities*

INTRODUCTION

This brief discusses how provisions of the Achieving a Better Life Experience (ABLE) Act (Public Law 113-295)¹ can be combined with federal benefit services and other federal programs and initiatives to further competitive integrated employment for people with disabilities. The brief contains a list of the provisions of the ABLE Act, their impact on the financial self-sufficiency and employment opportunities of persons with disabilities, and recommendations on how to best utilize the ABLE Act to maximize these outcomes in several systems in which people with disabilities participate, including Workforce Development, Vocational Rehabilitation, Medicaid, and Social Security. The policy brief concludes with a list of action steps so that each of these identified systems can partner with state ABLE programs to improve employment outcomes for ABLE eligible individuals.

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1 Achieving A Better Life Experience Act of 2014, Pub. L. No. 113-295 (2014)

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OVERVIEW OF THE ACHIEVING A BETTER LIFE EXPERIENCE (ABLE) ACT

The Achieving a Better Life Experience (ABLE) Act, which was signed into law on December 19, 2014, is designed to improve the financial stability of persons with disabilities by authorizing tax-advantaged savings accounts, known as ABLE accounts, for youth and adults with disabilities. These accounts are similar in construction to college savings accounts; both are included in Section 529 of the Internal Revenue Service Code.² Assets in ABLE accounts can be used to cover any “qualified disability expense.”³ Qualified disability expenses can include housing, transportation, support services, and any other expense reasonably related to disability.⁴ As described in detail in this brief, funds in an ABLE account, and distributions for qualified disability-related expenses, will not be taken into consideration when determining eligibility for federally-funded means-tested benefits, including Supplemental Security Income and Medicaid.

Financial insecurity and the inability to save money may act as a barrier to the goals of competitive integrated employment and community participation for people with disabilities. Individuals who rely on Medicaid Home and Community-Based Services (HCBS) to live and work in the community may lose access to these services if their “countable” assets exceed a certain limit. By excluding funds in an ABLE account from individuals’ countable assets, the ABLE Act allows persons with disabilities, who may be receiving benefits that are associated with certain types of means-testing, to save money for emergencies, pay for unexpected medical services not otherwise covered, save for long-term investments like education or retirement and, in general, enjoy economic security not previously afforded to them. The passage of the ABLE Act reflects our society’s commitment to equal opportunity for all, including people with disabilities.

IMPORTANT PROVISIONS OF THE ABLE ACT

CHARACTERISTICS OF ABLE ACCOUNTS

Tax Advantages

ABLE accounts are *tax-exempt* when the money in the account is used to pay for “qualified disability expenses (QDEs),” meaning anything related to the person’s disability.⁵ A person with a disability will not have to pay taxes on interest or capital gains on the money in the ABLE account as long as the money is used for QDEs. Since they do not incur these taxes on the saved funds, a person with a disability may get more utility out of the funds saved in ABLE accounts than on other money they receive.

2 National Disability Institute, *The ABLE Act*, ABLE National Resource Center (Oct. 5, 2016 3:00pm), <https://www.realeconomicimpact.org/public-policy/able-act.aspx>; See Internal Revenue Service, *529 Plans: Questions and Answers* (Oct. 5, 2016), <https://www.irs.gov/uac/529-plans-questions-and-answers>.

3 Pub L. 113-295 at §102(b)(1)(A) (Codified at 26 U.S.C. § 529A(e)(5)).

4 *Id.*

5 Pub. L. 113-295 §102(b)(1)(A) (Codified at 26 U.S.C. § 529A(e)(5)).

ABLE account funds are *tax-deferred* when the money is not used to pay for a qualified disability expense. That is, if a person with a disability makes a withdrawal from an ABLE account but does not use that money toward a qualified disability expense, the individual must then pay any applicable capital gains or other taxes on the withdrawn assets. Additional financial penalties are also associated with unqualified withdrawals.

Exclusion from Countable Assets

A key feature of ABLE accounts is that it is possible to save money in them that is not counted for the purposes of applying for and maintaining some federal benefits. Funds in the ABLE account will not count against the beneficiary when determining his/her eligibility (or continued eligibility) for federally-funded means-tested benefits. That being said, there is one exception that specifically applies to ABLE account owners who are also receiving Supplemental Security Income (SSI). For these individuals, only the first \$100,000 in an ABLE account will be disregarded. Once the funds in the ABLE account exceed the \$100,000 cap, the individual will forfeit their monthly cash benefit associated with SSI. The SSI cash benefit will resume once the account falls back below the \$100,000 threshold. It is important to understand that this \$100,000 cap only applies to the cash benefit related to SSI and has no negative effect on any other federally-funded means-tested benefit, including Medicaid.

Anyone can contribute into an individual's ABLE account, including the beneficiary themselves. As a result, the beneficiary could choose to deposit any portion of his/her paycheck into the ABLE account. The compensation contributed, as a result of employment, could be saved without having a detrimental effect on the person's eligibility for government benefits. It is important to note that the funds earned would still be counted as earned income, but not as a resource.⁶ ABLE accounts have a yearly contribution limit of \$14,000 per year.⁷

Example 1: Megumi makes \$15,000 a year, which is close to the federal minimum wage. She is enrolled in a Medicaid Buy-In program, allowing her to earn more than \$14,000 a year (SSI's income threshold for non-blind individuals is \$1,170 per month, or \$14,040 per year). Assuming she has less than \$2,000 in other countable assets (not including exempt assets like her house or car), Megumi could contribute \$6,000 per year to an ABLE account and her parents and relatives could contribute \$8,000 per year, making up a total of \$14,000. Megumi could thereby maintain eligibility for Medicaid while still maintaining a full-time job. Megumi's remaining income after her ABLE account contribution can be used to pay for other expenses.

Example 2: Jordan makes \$43,000 per year. He is enrolled in New York's Medicaid Buy-In Program, which has an income limit that is higher than \$43,000. Jordan inherits \$50,000 from a relative. Jordan would be able to open up an ABLE account and put \$14,000 of his inheritance into

6 The beneficiary still may lose eligibility if they exceed the *income* cap that exists in some federal benefits programs. However, many states have Medicaid Buy-In programs that allow people with disabilities to maintain eligibility for Medicaid while exceeding the income cap.

7 Pub. L. 113-295 (Codified at 26 U.S.C. §529A(b)(2)(B)).

his ABLE account, but this would still leave him with \$36,000, which is higher than the \$20,000 countable asset limit for the Medicaid Buy-In program. Jordan will become ineligible for the Buy-In program unless he either “spends down” an additional portion of his inheritance or explores other financial planning options, such as a special needs trust. In other words, contributing to his ABLE account enables Jordan to maintain resources that do not impact his eligibility for the Buy-In program.

Formation of ABLE Accounts/ABLE Act and the States

ABLE accounts must be opened through individual state-sponsored ABLE account programs. In order for a state to sponsor an ABLE program, it must enact state-level enabling legislation. Once the state has enacted enabling legislation, it may take some time before the program is ready to start accepting applicants. Most programs are not fully operational until at least a few months after ABLE legislation has been enacted.

There are no residency requirements in most state ABLE programs. This means that most state-sponsored ABLE programs are open to people living outside those states, as long as they are otherwise eligible for an ABLE account. However some states may limit eligibility for their ABLE account programs to state residents. Florida, for example, has only opened its ABLE program to state residents.

Example: Kim has a disability and lives in North Carolina. Kim’s disability occurred before age 26 and Kim receives SSI benefits. Kim wants to apply to Ohio’s ABLE account program, STABLE. Kim will be able to do so even though she lives in North Carolina.

As of the writing of this brief, there are 19 states currently running ABLE programs: Alabama, Alaska, Florida, Illinois, Iowa, Kansas, Kentucky, Nebraska, Nevada, North Carolina, Michigan, Minnesota, Ohio, Oregon, Pennsylvania, Rhode Island, Tennessee, Vermont, and Virginia. Florida’s and Kentucky’s ABLE programs are only open to residents in their states.

ELIGIBILITY FOR ABLE ACCOUNTS

Eligible Individual

A person can be an “eligible individual” under the ABLE Act in two situations. First, an individual is eligible for an ABLE account if, as a result of a disability with an age of onset before age 26, he or she was found eligible for Supplemental Security Income (SSI) or Social Security Disability Income (SSDI).

Example 1: Rashad has Down syndrome and was previously found eligible for SSI last year. Rashad can become the beneficiary of an ABLE account.

Second, a person is eligible for an ABLE account if he or she files a disability certification with the Secretary of the Treasury explaining that he or she is blind or “has a medically determinable physical or mental impairment, which results in marked and severe functional limitations, and which can be expected to result in death or which has lasted or can be expected to last for a continuous period of not less than 12 months,” and that this blindness or other disability also had an age of onset before age 26.

Example 2: Maria has autism and is not eligible for SSI or SSDI because she exceeds their earned income thresholds. She files a disability certification with the Secretary of the Treasury, signed by her physician, saying that she has autism and acquired the disability before the age of 26. Maria can apply for an ABLE account.

Unlike SSI or SSDI eligibility, there is no requirement that a person applying for an ABLE account be unable to work. However, ABLE is particularly useful when a person is jointly eligible for both ABLE and federal benefits programs, as ABLE accounts enable account-holders to save money while retaining eligibility for those programs. The eligibility requirements for these benefits programs should be taken into account when setting up ABLE accounts. Potential ABLE beneficiaries may, for example, take advantage of state Medicaid Buy-In programs, which allow them to continue to qualify for Medicaid while working even if they are not eligible for SSI or SSDI.

WHAT IS A “QUALIFIED DISABILITY EXPENSE?”

A “qualified disability expense” (QDE) can include a wide range of types of expenses. If the money in an ABLE account is used to pay for a qualified disability expense, that money will be exempt from income taxes and interest and capital gains taxes. Expenses such as education, transportation, personal assistance and healthcare services, and housing all qualify as QDE.

Example: Phyllis has an ABLE account and needs transportation to and from work. She also needs to pay for work clothes. Each of these expenses would be a QDE and Phyllis would be able to use her ABLE account to pay for them both. These withdrawals from her ABLE account would be tax-exempt at the end of the year.

IMPACT OF ABLE ACCOUNTS ON ELIGIBILITY FOR FEDERAL PROGRAMS

ABLE account beneficiaries, who are also SSI beneficiaries, can save up to \$100,000 in their accounts without losing eligibility for any federal benefits program, such as Medicaid or a Medicaid Buy-In program. This initial \$100,000 would not count towards the asset limit in some federal benefits programs. When the account goes over \$100,000, any additional assets in the account will count towards the asset cap.

Example: Jacob gets SSI benefits, which have a \$2,000 limit on countable assets. Together, Jacob and his family can contribute up to \$14,000 per year to his ABLE account. If Jacob has, at most,

\$1,000 in his bank account monthly and no other countable assets of his own, his ABLE account balance can reach up to \$101,000 without impacting Jacob's eligibility for SSI.

CONTRIBUTIONS TO ABLE ACCOUNTS

Size Limits

An ABLE account can contain up to the size limit that the state has established for 529 college savings accounts. This amount is around \$300,000 in many states. Additionally, the beneficiary, their friends and families can collectively contribute only \$14,000 in total per year to the ABLE account. As a result, unless the yearly contribution limits are later changed by legislation, reaching the size limit could take decades of making regular maximum contributions for most individuals.

GENERAL IMPACT OF ABLE ACCOUNTS ON WORKING ADULTS WITH DISABILITIES

ABLE accounts create several economic options for people with disabilities that were previously unavailable:⁸

First, people with disabilities will now have savings that they can use for emergencies or other sudden expenses, often referred to as “rainy-day funds.” A July 2014 survey conducted by National Disability Institute (NDI), a nonprofit whose main focus is the impact of disability on financial stability, found that people with disabilities were 30 percent less likely than people without disabilities to have enough saved funds to cover their expenses for three months. More than half of all persons with disabilities were also certain that, in the event of an emergency, they could not come up with \$2,000 to pay an unexpected expense.⁹

Lack of savings for sudden expenses can make it harder to keep a job. For example, if a person lacks rainy-day savings and uses a car to commute to work, that person might not be able to fix the car in the event of a sudden breakdown and thus might lose their job. In the event of a sudden health care emergency, a person without rainy-day funds may run into difficulty either if they lose wages due to lost work time or if their out-of-pocket health care expenses are unexpectedly high. This sudden financial crisis may interfere with the person's ability to pay for transportation to work or other work-related expenses, leading to job loss. Asset caps for SSI programs and Medicaid Buy-In programs are often very low, making it impossible to save for unexpected expenses. Since the ABLE Act enables people to accumulate savings beyond those asset limits, it may help people with disabilities retain employment by allowing them to save for these expenses.

8 Examples include Vocational Rehabilitation, to be discussed later.

9 Nicole Conroy, Elizabeth Jennings, Katherine McDonald, Michael Morris, *Financial Capability of Adults with Disabilities: Findings from the FINRA Investor Education Foundation 2012 National Financial Capability Study*, National Disability Institute (2014), http://www.realeconomicimpact.org/data/files/reports/ndi_financial_capability_report_july_2014.pdf

Second, people with disabilities may be able to use this money to save for retirement, housing, college, or long-term health care expenses. Many working people with disabilities either lack the savings required to invest in these areas or invest less in them than people without disabilities. Disability-related expenses under ABLE may include college tuition, housing, medical care, or long-term care.¹⁰

Third, people with disabilities can use ABLE accounts to ensure greater financial stability.

People with disabilities are much more likely to receive most of their income from federal benefits programs and to be dependent on only a single source of income.¹¹ While ABLE accounts could not plausibly be used as another full-time source of income, their existence may act as a buffer in case benefits are interrupted, or as an additional source of funds for disability-related monthly expenses not covered by their benefits.

Finally, people with disabilities may be able to use ABLE accounts for out-of-pocket medical expenses. People with disabilities often have a greater number of medical expenses (and a greater number of unpaid medical bills) than people without disabilities.¹² A person's health and ability to function in a workplace environment are deeply interrelated. ABLE account savings could be used to cover copays or other extra expenditures not covered by the person's health insurance plan. Consistent access to medical care may help a person avoid absences from work, health-related financial emergencies, and other health-related barriers to employment.

THE ABLE ACT AND VOCATIONAL REHABILITATION

INTRODUCTION

Vocational Rehabilitation services ("VR Services") are authorized under the Rehabilitation Act of 1973.¹³ Under the Rehabilitation Act, each state creates a vocational rehabilitation agency which delivers VR services to people with disabilities, for the purposes of gaining and maintaining employment.¹⁴ VR services can consist of any number of different services that help prepare people with disabilities for future gainful employment.¹⁵ VR is the primary source of public funding for supported employment services and job training services for people with disabilities.¹⁶ They are also one of the only sources of public funding that focuses solely on employment services.

10 Pub. L. 113-295 (Codified at 26 U.S.C. § 529A(e)(5)) (Lists "education" among examples of disability-related expenses).

11 Financial Capability of Adults with Disabilities at 24.

12 Financial Capability of Adults with Disabilities at 22.

13 Rehabilitation Act of 1973, 29 U.S.C. § 720 (2016).

14 Rehabilitation Act of 1973, Publ. L. No. 93-112 § 2 (1973) (original text without subsequent amendments), retrieved from: https://www.eeoc.gov/eeoc/history/35th/thelaw/rehab_act-1973.html.

15 29 U.S.C. § 723.

16 Anne Roux, Jessica Rast, K.A. Anderson, and Paul Shattuck, A.J. Drexel Autism Institute, *National Autism Indicators Report: Vocational Rehabilitation* 8, Life Course Outcomes Research Program (2016).

The Rehabilitation Act has been amended and reauthorized multiple times, most recently by the Workforce Innovation and Opportunity Act (WIOA) in 2014.¹⁷ WIOA ensures that VR services are focused on competitive integrated employment as a preferred outcome for people with disabilities and expands the number of people who receive VR services, particularly with respect to transition-aged youth.

A person is eligible for VR if they have a disability with a significant physical or mental impairment that creates barriers in gaining or maintaining employment.¹⁸ The disability need only be severe enough to make it difficult to attain employment, rather than severe enough to make the person eligible for SSI or SSDI.¹⁹

ABLE ACT AND VOCATIONAL REHABILITATION RECOMMENDATIONS

The following recommendations discuss how ABLE accounts may be used in conjunction with VR services to maximize employment outcomes for people with disabilities. These recommendations also discuss policies that state VR programs could adopt with regard to ABLE accounts, in order to support ABLE account owners and avoid conflicting with the ABLE Act's provisions.

Recommendation 1: VR agencies should not take a person's ABLE account funds into account when determining the person's financial need for the purpose of program eligibility.

4 CFR § 361.54(b) allows VR agencies to consider the beneficiary's level of financial need when determining how much of the cost of services it will pay. Several services are not subject to this financial needs test, including diagnostic services, counseling, guidance and job referral services, job placement services, and any auxiliary aids and services.²⁰ People on federal needs-based benefits programs, such as SSI or SSDI, are also exempt from financial needs testing and are not required to provide any financial contribution as a condition of receiving services.²¹

Section 103 of the ABLE Act states that "for the purpose of determining eligibility to receive, or the amount of, any assistance or benefit authorized by such provision to be provided to or for the benefit of such individual... any amount...in the ABLE account..., any contributions to the ABLE account of such individual..., and any distribution for qualified disability expenses... shall be disregarded ..."²² Vocational Rehabilitation services are authorized by the federal Rehabilitation Act of 1973 and use a combination of federal and state funds, despite being generally provided by individual states. Therefore, ABLE account funds should be ignored when determining the beneficiary's level of contribution to VR services.

17 Workforce Innovation and Opportunity Act, Pub. L. 113-128 (2014).

18 29 U.S.C. § 722(a)(1).

19 29 U.S.C. § 705(20)(A).

20 34 CFR 361.54(b)(3).

21 34 CFR 361.54(b)(3)(ii).

22 Publ. L. 113-295 at § 103 (Codified at 26 U.S.C. §529A).

Example: Abed is unemployed and just out of high school. Abed wants to use VR services to get a job in the community. Abed has \$80,000 in savings in his ABLE account and no other significant assets. VR counselors should disregard Abed’s ABLE account and determine that he will not contribute anything to the cost of services. Abed is able to use VR services to pay for the support he needs at his job and thus successfully gains employment.

Recommendation 2: State VR programs should consider providing assistance in linking people to assistance with setting up ABLE accounts as one of the services they offer to VR participants.

ABLE accounts may be difficult to set up for some people with disabilities. Choosing an ABLE program to enroll in involves weighing a number of different financial considerations. The National Disability Institute webinar, “[Becoming ABLE Ready: Choosing the Right Program for You](#),” outlines several considerations a potential beneficiary must take into account, including proof of disability documentation, whether the account has maintenance fees, investment concerns, and sometimes state residency.²³

Since ABLE accounts can increase the financial stability and employability of an ABLE account owner, VR program counselors should consider providing information to beneficiaries who want to set up ABLE accounts that links them to people who can assist them in setting up an account. Providing assistance with the financial decision-making process involved in ABLE enrollment may also improve the beneficiary’s financial literacy and general financial independence. Because ABLE accounts can help people with disabilities build savings while maintaining benefits, assistance setting up ABLE accounts may also form an important component of benefits planning.

Example: Tauna wants to apply for an ABLE account so that she can build up savings that will help her maintain her job and achieve relative financial stability. Tauna is having some trouble understanding how to set up an ABLE account and evaluating different ABLE account options. Tauna’s VR Counselor referred her to a benefits counselor and other people who were trained in how ABLE accounts work, who assist Tauna with setting up an ABLE account. Tauna obtains an ABLE account and decides to use it to pay for needed services not covered by VR.

Recommendation 3: VR funds and other funds placed in a person’s ABLE account can both be used to cover employment services, ensuring that a greater number of people with disabilities are eligible for VR.

State VR agencies, when they cannot serve everyone, create an Order of Selection to determine which individuals they will prioritize for receiving services.²⁴ The states are required to do this by the Rehabilitation Act itself, as all beneficiaries served must be provided with all services they

23 ABLER National Resource Center, *Becoming ABLE Ready: Choosing the Right Program for You*, <http://www.ablenrc.org/events/becoming-able-ready-choosing-right-program-you> (Last visited Oct. 14, 2016, 4:00pm).

24 Ronald M. Hager, Cornell University, *Policy and Practice Brief #23: Order of Selection for Vocational Rehabilitation Services: An Option for State VR Agencies Who Cannot Serve All Eligible Individuals* 3, 4 (2004).

need to gain and maintain employment.²⁵ The states are also required to prioritize the individuals with the most significant employment needs, and must serve them first.²⁶ For example, Ohio's Vocational Rehabilitation system has an Order of Selection system, which is similar to the Order of Selection in most states, that prioritizes individuals by putting them into three categories of priority: (a) Most Significant Disability; (b) Significant Disability; and (c) Other Eligible Individuals.²⁷ Individuals with the first level of priority are more likely to receive services. Individuals in the second level of priority are typically put on a waiting list, and individuals in the third level of priority often do not receive services at all.²⁸

However, there may be situations where a state VR program would help a person determine which services they need, but the person does not have a significant enough disability to be served by VR due to the state's Order of Selection. In that situation, the money saved in an ABLE account can act as an extra layer of financial security while the person awaits services.

Example: Ehuang has a traumatic brain injury and has an ABLE account in Ohio. Ehuang is not enrolled in any of the Medicaid-funded waiver or demonstration programs in her state, which normally provide long-term employment services. She wants to receive employment services and work in the community. Ehuang meets with a VR counselor and the VR counselor determines that Ehuang falls into the Significant Disability level of priority, and places her on the VR waiting list. While she is on the VR waiting list, Ehuang can use her ABLE account to pay for some of the services related to her vocational goals. Once she gets off the waiting list, Ehuang can use the ABLE account as an extra layer of financial security. She may use her ABLE account to ensure the continuity of her services in case her benefits through VR are limited or temporarily suspended.

THE ABLE ACT AND MEDICAID-FUNDED SERVICES

INTRODUCTION

Medicaid pays for many disability-related support services, including supported employment services.²⁹ The Centers for Medicare and Medicaid Services (CMS) also oversees Medicaid Buy-In programs, which are designed to support people who are working so that they can retain the support services they need from Medicaid.³⁰

The ABLE Act is designed to *supplement*, rather than supplant, benefits and services provided

25 29 U.S.C. § 701(b)(1).

26 234 C.F.R. § 361.36(a)(3).

27 Ohio Admin. Code 3304-2-65 (2013); *Ohio Rehabilitative Services Commission, Order of Selection Overview*, retrieved from: <http://www.ohioslha.org/pdf/Legislative%20Archive/RSC-OOSOverview.pdf>.

28 *Id.*

29 See National Council on Disability, *Medicaid Managed Care for People with Disabilities* 23 (2013), available at http://www.ncd.gov/rawmedia_repository/20ca8222_42d6_45a5_9e85_6bd57788d726.pdf

30 Center for Medicare and Medicaid Services, *Medicaid Employment Initiatives*, at: <https://www.medicaid.gov/medicaid/ltss/employment/index.html> (last accessed Oct. 14, 2016).

from other sources. Therefore, it can cover gaps in services and supports and, for some people, enable them to maintain Medicaid coverage while possibly saving up for future expenses.

ABLE ACT AND MEDICAID-FUNDED HCBS RECOMMENDATIONS

The following recommendations discuss how ABLE accounts may be used in conjunction with Medicaid-funded HCBS services to maximize employment outcomes for people with disabilities who receive those services.

Recommendation 1: Beneficiaries should consider using ABLE accounts to pay for Medicaid Buy-In Program premiums, rather than limiting their earned income to stay below Medicaid’s income limits, so that they continue to be eligible for their Medicaid-funded supported employment services while steadily improving their financial status.

Forty-two states participate in the Medicaid Buy-in Program, and an additional four provide similar services through Section 1115 demonstration programs.³¹ These programs allow individuals with disabilities earning greater than Medicaid’s income limits to continue to qualify for Medicaid by meeting certain requirements and paying a premium. Normally, this includes only people with disabilities making at or below 133 percent of the poverty line (in states that have expanded Medicaid) or individuals who qualify for SSI or SSDI qualify for Medicaid. Medicaid Buy-In Programs allow people with disabilities to continue to use Medicaid as long as they meet all disability-related requirements for SSI in every respect *other* than the income and asset limits.³²

Medicaid Buy-In programs typically have their own income limits, above which a person is no longer eligible for the program. The income limits depend upon the specific state’s Medicaid Buy-In program.³³ Individuals in Medicaid Buy-In Programs must “buy into” Medicaid, by paying a state-specific premium for Medicaid services.³⁴ The programs also often have asset caps, which are set by the state.³⁵

ABLE account holders intending to transition into competitive integrated employment can use their ABLE accounts to pay premiums for Medicaid Buy-In programs, thus maintaining eligibility for Medicaid-funded employment and health insurance supports. As they earn more, they can use their ABLE accounts to build up savings without being concerned about the asset caps for the Medicaid Buy-In program. If their incomes fall below the threshold for traditional Medicaid, they

31 Center for Medicare and Medicaid Services, *Medicaid Employment Initiatives*, retrieved from: <https://www.medicaid.gov/medicaid/ltss/employment/index.html> (last accessed Oct. 21, 2016).

32 *Id.*

33 Henry J. Kaiser Family Foundation, *Medicaid Eligibility through Buy-In Programs for Working People with Disabilities*, retrieved from: <http://kff.org/other/state-indicator/medicaid-eligibility-through-buy-in-programs-for-working-people-with-disabilities/?currentTimeframe=0> (Last accessed Dec. 1, 2016)

34 See Office of the Assistant Secretary for Planning and Evaluation (ASPE), HHS-100-00-0018, *Medicaid Buy-In Programs: Case Studies of Early Implementer States* (May 2002), retrieved from: <https://aspe.hhs.gov/basic-report/medicaid-buy-programs-case-studies-early-implementer-states>

35 Henry J. Kaiser Family Foundation.

may switch back to traditional Medicaid to save on premiums without having to “spend down” the money they have saved in their ABLÉ account.

Example: Richard lives in Illinois, a state that has a Medicaid Buy-In Program. In Illinois, a person is eligible for the Medicaid Buy-In Program as long as they continue to meet the SSI definition of disability, make under \$3,433 in earned income per month, and have under \$25,000 in non-exempt assets.³⁶ Richard makes \$40,000 a year, which is less than \$3,433 in earned income per month. He has less than \$25,000 in non-exempt assets (including his bank account, but not including his car and house). This means that he can stay on Medicaid, which pays for the personal assistance and employment support services that he needs to keep his job. However, he must pay a premium to continue receiving his Medicaid-funded employment services. Richard can pay this premium using the money saved in his ABLÉ account. He can also use his ABLÉ account to save money beyond the \$25,000 limit. This allows Richard to save for a down payment on a house, to pay tuition for a graduate program that will improve his job prospects, or to save for retirement.

Recommendation 2: Medicaid case managers should provide assistance in linking people to support for setting up ABLÉ accounts. ABLÉ account savings contribute to successful employment outcomes and may reduce reliance on public benefits.

Since ABLÉ accounts can increase financial stability, they have the potential to improve employment, community living, and health outcomes. Moreover, because they allow people with disabilities to save money while maintaining eligibility for Medicaid, they may reduce reliance on income support programs such as SSI. Medicaid case managers should consider connecting or referring people they support to services that could provide assistance in establishing an ABLÉ account. ABLÉ accounts may be part of a comprehensive person-centered plan for employment and can be supported by Benefits Counselors.

Example 1: Jacquan wants to apply for an ABLÉ account so that she can build up savings that will help her maintain her job and achieve relative financial stability. Jacquan is having some trouble understanding how to set up an ABLÉ account. Jacquan’s Medicaid case manager refers her to a Benefits Counselor, who assists her in setting one up. Jacquan is able to use her ABLÉ account to pay for expenses not otherwise covered by Medicaid. Jacquan and her benefits counselor both use the website, www.ablenrc.org, to learn more about ABLÉ accounts and compare costs and features of current ABLÉ programs to help make an informed choice about which state ABLÉ program to choose.

Example 2: Juan enjoys the part-time job that he obtained using Medicaid-funded supported employment services. Because getting reliable and flexible transportation to the job is difficult, he wants to save up to buy a used car. However, he is worried about losing eligibility for Medicaid benefits if he saves up too much money. His case manager suggests opening an ABLÉ account and explains how they work. With his case manager’s support, Juan gets assistance to set up the

36 Illinois Department of Healthcare and Family Services, Health Benefits for Workers with Disabilities, *Eligibility*, retrieved from: <https://www.illinois.gov/hfs/MedicalPrograms/hbwd/Pages/eligibility.aspx> (Last accessed Dec. 1, 2016). Exempt assets are assets that are not counted for the purposes of Medicaid eligibility. This may include the house in which the person lives or the vehicle the person drives to work.

ABLE account. Juan's family members can also contribute to his ABLE account, which adds to the amount of money that he can save. Juan's family members' contributions are not counted as income for the purposes of his Medicaid eligibility. He is able to save up for a car without worrying about losing his supported employment services. With better transportation, he is able to increase the number of hours he works per week, leading to a significant increase in earned income.

Recommendation 3: People who benefit from Medicaid-funded HCBS can use ABLE accounts as emergency “bridge” funding for employment services.

Medicaid waiver programs are required, under *Olmstead* and applicable HCBS setting regulations, to maximize individuals' access to competitive integrated employment. As a result, it is not anticipated that HCBS beneficiaries would routinely need to pay out-of-pocket for employment support services. Nevertheless, ABLE account funds can help pay for employment supports in emergency situations or when the beneficiary finds that Medicaid and other sources of funding are not sufficient to cover the full range of services. For example, a Medicaid beneficiary may use an ABLE account to pay for a taxi on a day when Medicaid-funded transportation services are not available, but on which the individual still needs to travel to work. Medicaid beneficiaries may also use ABLE accounts to pay for work-related expenses that are not reimbursable through Medicaid, such as the cost of work-appropriate attire.

Example 1: George is eligible for Medicaid-funded supported employment services. George works as a filing clerk for ABC Corporation. George, when creating his person-centered Individual Service Plan (ISP) with his case manager and others who are part of his circle of support, realizes that although he has the skills and an interest in doing filing work, he has trouble understanding workplace etiquette and meeting other workplace expectations. George requests job coaching, a personal assistant, and a customized employment arrangement with ABC Corporation. George finds that Medicaid is able to pay for approximately 30 hours per week of the job coaching services and 30 hours per week of the personal assistant service. George also gets transportation services. George is happy with his services, but still needs to pay for the dry cleaning for his work clothes, which is not covered by Medicaid. George pays for his dry cleaning using the funds in his ABLE account.

Example 2: In this example, George also receives Medicaid-funded transportation to and from work. One day, George's transportation provider does not show up. If George is late, he will be fired. George uses the funds in his ABLE account to order a cab. George seeks reimbursement for the cab ride later. This is a great way to use ABLE accounts to address unexpected gaps in coverage.

INTRODUCTION

Individuals with disabilities who receive one of the Social Security Administrations disability-based benefits, SSI (Supplemental Security Income) or SSDI (Social Security Disability Insurance) must have an onset of disability date prior to age 26 in order to be eligible to open an ABLE account. The Social Security Administration provides comprehensive policy guidance on the treatment of ABLE accounts to enable SSI and SSDI beneficiaries to determine the impact, if any, of ABLE accounts on cash and healthcare benefits. Both SSI and SSDI beneficiaries can deposit either unearned income or earned income into an ABLE account. When earned income is reported to Social Security, they routinely apply the work ‘rules’ or work incentives to the earnings, which may affect the amount of income that is determined to be countable. Countable income, in turn, may affect the cash benefit that is payable to the beneficiary, which in turn impacts the amount that may be available to be deposited into the ABLE account. The work rules can be found in SSA’s [Red Book: A Guide to Work Incentives](#).

The effect of the application of the work incentives to earned income is different for each benefit. ABLE account-holders who receive SSI and work may incrementally lose some or all of their Social Security cash benefits due to their earnings. After certain deductions are applied, an SSI beneficiary loses one dollar for every two dollars earned. It is important to note that the end result is a higher total income for an SSI recipient who works. The effects of earned income on SSDI benefits, however, is quite different. After a nine-month trial work period, earnings are subject to countable income rules which may or may not allow a cash benefit to be paid depending upon the level of countable earnings.

Under both programs, cash benefits are incrementally affected, providing beneficiaries time to plan for changes to their cash benefit and to get support from a benefits counselor. The work incentives include employment support provisions, available under both SSI and SSDI. This incremental change in benefit status allows an individual to plan their decreased dependency on Social Security cash benefits. Unfortunately, there is not a magical number to point to as an earnings cap under either program since work incentives and other factors play key roles. Working ABLE account holders who receive SSI and/or SSDI will require high quality benefit planning information to make informed decisions. Individuals can access benefits planning from a number of sources. For example, the [Ticket to Work program](#) can pay for benefits planning services, provide a choice in providers, and is available to all SSA beneficiaries. Depending on the state in which people live, benefits planning may also be available through vocational rehabilitation, American Job Centers, developmental disabilities, behavioral health, Centers for Independent Living, and other agencies that may have certified benefits planners on staff.

If an employment and/or return to work effort is so successful that it results in a termination of benefit status for an SSI or SSDI beneficiary, Social Security provides the “safety net” of expedited reinstatement of benefits for eligible individuals who need to quickly regain their cash and/or health benefits if they are unable to consistently work at the higher level of earnings.

There are also a number of other “safety nets,” including ways a beneficiary can maintain their Medicaid and/or Medicare coverage, even if they are no longer eligible for Social Security cash benefits. The Social Security work incentives provide special provisions, which include an Extended Period of Medicare Coverage (EPMC), a Medicare ‘buy in’ provision for continued Medicare after the EPMC expires, and [1619\(b\), for Continued Medicaid Eligibility](#). This provision means that SSI beneficiaries who have earnings too high for a SSI cash payment may be eligible for Medicaid. To be eligible, they have to have been eligible for an SSI cash payment for at least one month; still meet the disability requirement; still meet all other non-disability SSI requirements; need Medicaid benefits to continue to work; and have gross earnings that are insufficient to replace SSI, Medicaid and publicly funded attendant care services. Most states also offer a [Medicaid buy-in program](#) for working persons with disabilities.

It is important to remember that SSDI benefits are paid from the trust funds and are not means-tested benefits. An ABLE account does not impact SSDI cash benefits. Conversely, SSI cash benefits are paid from the general tax revenues and are means-tested. Therefore, there are resource limits for SSI eligibility. Liquid resources are counted and would include cash, money in a bank account, and investments such as stocks, bonds, and mutual funds. The total value of these resources count towards the \$2,000 resource limit for an individual or \$3,000 limit for an eligible SSI couple (both parties receive SSI benefits). It is also important to note that assets, such as a primary residence or one vehicle, are different and are not countable resources.

ABLE ACT AND SOCIAL SECURITY BENEFICIARY RECOMMENDATIONS

The following recommendations discuss how ABLE accounts may be used by people who are Social Security beneficiaries to maximize employment outcomes and improve financial stability.

Recommendation 1: Individuals can place certain resources, including earnings or gifts from family members, into an ABLE account. The SSI beneficiary remains eligible for SSI.

Social Security places rules on unearned income received by beneficiaries in the SSI program that may result in a reduction of monthly cash benefits in the month received. For ABLE account owners, unearned income deposited by family members and others into ABLE accounts will be disregarded. Interest, dividends, or an appreciation in value earned in the ABLE account is also disregarded.

SSI recipients are held to resource rules. The resource limit for SSI recipients is \$2,000 (individual). Up to \$100,000 saved in ABLE accounts does not count toward the SSI resource limit. Therefore, individuals receiving SSI can still place monetary gifts from family members or savings from previous jobs into ABLE accounts. They can then use the money in their ABLE accounts to pay for any qualified disability expense, including some employment-related expenses. A benefits planner can provide information to weigh the advantages of paying for employment-related disability expenses from an ABLE account or deducting the costs as work incentives to reduce countable income.

Example: Rebecca has a significant disability and is an SSI recipient. She creates an ABLE account in preparation of working and saving money for her future. While she is collecting SSI, Rebecca’s friends and family can contribute to Rebecca’s ABLE account without a reduction in her monthly SSI cash benefit. Her ABLE account savings are not subject to SSI resource limits, and the accrued interest or earned dividends paid on her ABLE account savings does not count as unearned income. When Rebecca is ready to seek employment, her ABLE account can provide her with extra financial security and enable her to pay for work-related expenses due to her disability. When Rebecca begins working, she will weigh whether paying these expenses from her earnings is more advantageous, as they may decrease her countable income, which may allow her to keep some or all of her SSI cash benefit.

Recommendation 2: Beneficiaries may be able to utilize the SSI PASS (Plan for Achieving Self-Support) program in conjunction with ABLE account savings to maintain supported employment services.

The PASS (Plan for Achieving Self-Support) program allows an SSI recipient to set aside any money other than their SSI to save for a work goal. The funds set aside are deducted from countable earnings allowing an individual to keep more of their monthly SSI cash benefit. For individuals receiving supported employment services, PASS plans allow the individual to set aside part of their earnings to pay for their own supports. PASS plans are time limited. Aligning a PASS plan with an ABLE account will allow an individual to make long-term plans for obtaining and maintaining employment along with the critical supports needed for ongoing success.

THE ABLE ACT AND WORKFORCE DEVELOPMENT SYSTEM (TITLE I)

INTRODUCTION

The reauthorized workforce development system signed into law as the Workforce Innovation and Opportunities Act (WIOA) (Public Law 113–128) places renewed emphasis on offering strategies to serve individuals with barriers to employment, including youth and adults with disabilities. Financial assistance provided to states requires effective and meaningful participation of youth and adults with disabilities in all services and supports provided at American Job Centers (AJCs) and through one-stop partner agencies and organizations.

WIOA requires that financial literacy education be made available to participating adult job seekers, including individuals with disabilities, who need this knowledge and skill-building, as specified in their plan for employment, to help meet their agreed upon employment goals. Local implementation of WIOA youth activities must include financial literacy education as one of 14 specific services available to youth. Helping “participants gain the knowledge, skills, and confidence to make informed financial decisions that enable them to attain greater financial health and stability” could include learning about eligibility for, the benefits of, and the selection of an appropriate ABLE program.

Financial literacy is defined in the rules to implement WIOA requirements by including nine program elements (29 U.S.C. § 3164):

1. Support the ability of participants to create budgets, initiate checking and savings accounts at banks, and make informed financial decisions;
2. Support participants in learning how to effectively manage spending, credit and debt, including student loans, consumer credit, and credit cards;
3. Teach participants about the significance of credit reports and credit scores; what their rights are regarding their credit and financial information; how to determine the accuracy of a credit report and how to correct inaccuracies; and how to improve or maintain good credit;
4. Support a participant's ability to understand, evaluate, and compare financial products, services, and opportunities and to make informed financial decisions;
5. Educate participants about identity theft, ways to protect themselves from identify theft, and how to resolve cases of identity theft and in other ways understand their rights and protections related to personal identity and financial data;
6. Support activities that address the particular financial literacy needs of youth with disabilities, including connecting them to benefits planning and work incentives counseling;
7. Support activities that address the particular financial literacy needs of non-English speakers, including providing support through the development and distribution of multilingual financial literacy and education materials;
8. Provide financial education that is age appropriate, timely, and provides opportunities to put lessons into practice, such as access to safe and affordable financial products that enable money management and savings; and
9. Implement other approaches to help participants gain the knowledge, skills, and confidence to make informed financial decisions that enable them to attain greater financial health and stability by using high quality, age-appropriate, and relevant strategies and channels including, where possible, timely and customized information, guidance, tools, and instruction.

ABLE ACT AND WORKFORCE DEVELOPMENT SYSTEM (TITLE I) RECOMMENDATIONS

The following recommendations discuss how ABLE accounts could be used in coordination with WIOA services to improve competitive, integrated employment outcomes for youth and adults with disabilities. State and local Workforce Development Boards can explore ways to increase awareness, understanding and establishment of ABLE accounts for eligible youth and adults with disabilities to support career pathways and continued skills development to improve employment results.

Recommendation 1: State and local Workforce Development Board could explore partnerships with their state ABLE program to improve recruitment of eligible individuals and work together on helping individuals set financial goals to improve employment outcomes.

Nineteen states have established ABLE programs and, by the end of 2017, there are expected to be ABLE programs in over half the states. An ABLE account could be a first step to setting financial goals that focus on skills development to help an individual become more competitive for a job with a career path, covering expenses not covered by mandated partner agencies under WIOA. At state and local Workforce Development Board levels, the state ABLE program manager could be invited to present at a Board meeting on their education and outreach efforts, and suggest possible collaboration options including offering joint trainings on setting financial goals to improve educational and/or employment outcomes, in addition to providing information on how to open ABLE accounts.

Example: James is participating in a summer youth on-the-job training program, receiving a paycheck every two weeks. This is the first time James has earned income. He has been receiving SSI benefits, for which he was required to prove that he was unable to work in order to be eligible. The state ABLE program has teamed up with a local bank and credit union to offer financial literacy education classes, which James learns about from his summer youth program counselor. James opens an ABLE account with funds coming from his paycheck. He has a long-term goal to move into an apartment of his own. He can finally save more than \$2,000, which has been his asset limit to remain eligible for SSI. He asks his parents and his brother to also contribute to his ABLE account to help him achieve his financial goal.

Recommendation 2: The American Job Centers can collaborate with a state ABLE program and banks to offer job seekers financial literacy education that includes information about the benefits of an ABLE account to help obtain or retain valued employment outcomes.

As part of adult career services under WIOA, financial literacy education is one of over 10 specific services that should be provided to a job seeker, “if determined to be appropriate in order for an individual to obtain or retain employment” (29 U.S. Code § 3174).

A state ABLÉ program and banks are potential collaborators to offer financial literacy education to help the targeted audience make informed decisions about ABLÉ accounts and other financial products.

Example: Mary has enrolled in a community college to improve her computer skills with a goal of earning a certificate in software development. This will be a new career pathway for her with great job prospects. Her AJC counselor has supported her with job training funds, but she needs to buy a computer, have access to the internet, and save for her own means of transportation as the paratransit program she uses is very unreliable. Mary learns about ABLÉ accounts from financial literacy classes offered by United Way, in collaboration with a local bank, and in coordination with the AJC and the Mayor's Office on Consumer Affairs. Her financial counselor helps her determine that she is eligible to open an ABLÉ account. Mary also gets support to select a state ABLÉ program and create a budget that will allow her to begin to save to meet identified financial needs. She asks her brother and sister to commit to a monthly contribution to her ABLÉ account and they agree to help. Mary creates a list of others who could also contribute.

ABLE IMPROVEMENT BILLS AND EMPLOYMENT

In April 2017, three bills were introduced in the House and Senate to improve the ABLÉ Act's effectiveness as a tool for maximizing the financial stability and employment potential of persons with disabilities. The bills focus on (1) adjusting the allowable age of onset of disability beyond 26 so that more people are eligible, (2) enabling ABLÉ beneficiaries who work and earn income to save additional amounts in their ABLÉ account above the current annual maximum contribution (\$14,000), and (3) allowing parents to roll over money saved in college 529 savings accounts into ABLÉ accounts.

CONCLUSION

The **Achieving a Better Life Experience Act** is a transformative law with great potential. Its tax-advantaged disability savings accounts allow people with disabilities to save money for a wide variety of future expenses that can support their competitive integrated employment, and be used for everything from emergencies to community living expenses to health care expenses. Funds can even be used to cover the costs of benefits planning and financial counseling and/or coaching. For millions of eligible individuals with disabilities and their families, contributions to an ABLÉ account will be a down payment on greater freedom, productivity, and quality of life, both short-term and long-term, depending on individual goals and aspirations. The following methods of using ABLÉ accounts are recommended to maximize employment and leverage support from service systems, as needed.

(1) Vocational Rehabilitation staff can connect beneficiaries with organizations and individuals who can assist them in signing up for ABLÉ accounts. Beneficiaries of VR services can use the money in

the ABLÉ accounts to improve their general financial stability or to pay for work-related expenses not covered by VR.

(2) Medicaid beneficiaries should consider using their ABLÉ accounts to pay Medicaid Buy-In Program premiums if they are eligible for the Medicaid Buy-In and live in a state that sponsors a Medicaid Buy-In program. ABLÉ accounts can also be used to pay for employment-related services in emergency situations or situations where Medicaid does not currently cover an employment-related expense. Staff in Medicaid programs should connect beneficiaries with organizations and individuals who can assist them in setting up ABLÉ accounts, as these savings accounts could improve employment, financial self-sufficiency, and health outcomes while reducing reliance on public benefits.

(3) People receiving public benefits should seek out people who can provide them with benefits counseling and financial planning. Benefits counseling is available in most areas through Community Work Incentives Coordinators (CWICs) and Work Incentives Planning and Assistance (WIPA) staff. Some of these staff are funded by the Social Security Administration (SSA). Others may be funded by Vocational Rehabilitation (VR) administrations or through the SSA's Ticket to Work program. Since everyone's situation is different, it is important to meet with people who can advise beneficiaries on their options so that they can make informed choices. In addition to individual in-person benefits counseling, beneficiaries can also get information by phone at the Ticket to Work Help Line, [1-866-968-7842](tel:1-866-968-7842) / [866-833-2967](tel:866-833-2967) (TTY) Monday through Friday from 8:00AM - 8:00PM EST or on-line at <https://www.choosework.net/findhelp/>.

(4) Youth and adults with disabilities who seek services from the Workforce Development System (through Title I of the Workforce Innovations and Opportunity Act)) should seek financial literacy education programs and/or services, including support to understand, evaluate, compare and make informed decisions about financial products, services, and opportunities. These decisions could include evaluating and determining the choice of which state ABLÉ program may best meet an individual's needs for support to achieve competitive, integrated employment goals and outcomes. Financial literacy education is one of 14 specific services available to targeted youth under WIOA including youth with disabilities. Adults with disabilities also can ask for financial literacy education to help meet their employment goals under an individualized plan for employment as part of support services offered by American Job Centers.

ACHIEVING A BETTER LIFE EXPERIENCE (ABLE) ACT: OPPORTUNITIES TO MAXIMIZE COMPETITIVE INTEGRATED EMPLOYMENT OUTCOMES – BRAIDING RESOURCES ACTION STEPS

The following offers a set of action steps for each of these four systems to consider in order to benefit ABLE eligible individuals with disabilities.

1. Vocational Rehabilitation System

- The state VR agency enters into a partnership with the state ABLE program to train VR counselors about the benefits of an ABLE account in meeting employment goals, offering information and educational resources to be shared with clients.
- VR counselors provide assistance to their clients in identifying the benefits of an ABLE account in meeting employment goals and making informed decisions about selecting the most appropriate state ABLE program to meet their needs.

2. Medicaid System

- The state Medicaid agency, the state agency for Intellectual and Developmental Disabilities Services, the state Behavioral Health agency, and the state ABLE program can develop partnerships to increase awareness and understanding of the benefits of an ABLE account. These include sharing information resources, and conducting staff training to build knowledge of ways an ABLE account can support employment results by covering the cost of Medicaid Buy-In premiums and other costs (transportation, technology) not covered by public funding.
- The state Medicaid agency can help identify ABLE-eligible individuals to receive information about ABLE accounts and learn more through virtual and in-person presentations by ABLE account owners describing how they are using their account to support employment and community participation goals.

3. Social Security Beneficiaries

- Social Security Community Work Incentive Coordinators (CWICs) receive information, resources, and training from their state ABLE program to become more informed about the benefits of an ABLE account to support employment goals of ABLE-eligible Social Security beneficiaries.
- ABLE information resources and training are shared with all Employment Networks (ENs) and Work Incentive Planning and Assistance (WIPA) grantees in the state to share with SSI and/or SSDI beneficiaries, which can assist them in selecting a state ABLE program and set savings goals to improve employment outcomes.

4. Workforce Development System

- State and local Workforce Development Boards can develop a partnership with their state ABLÉ program and banks to offer financial literacy education that includes learning about the benefits of an ABLÉ account to support employment goals for eligible youth and adults with disabilities.
- American Job Centers can develop a partnership with their state ABLÉ program and a local bank to offer job seekers financial literacy education required under Title I of WIOA to help adults with disabilities to open ABLÉ accounts to cover the costs of unmet financial needs that support employment goals.

To learn more about the ABLÉ Act and state ABLÉ programs, visit the ABLÉ National Resource Center (www.ablenrc.org).

Document Credits: This document was written by Kelly Israel, Policy Analyst and Samantha Crane, Director of Legal and Public Policy, Autistic Self Advocacy Network (ASAN), and Michael Morris, Christopher Rodriguez, Elizabeth Jennings and Rebecca Salon from the LEAD Center.

The LEAD Center is a collaborative of disability, workforce and economic empowerment organizations dedicated to a single mission: advancing sustainable individual and systems level change to improve competitive, integrated employment and economic self-sufficiency for people across the spectrum of disability. Led by [National Disability Institute](#) with funding from the [U.S. Department of Labor's Office of Disability Employment Policy](#), the LEAD Center, known formally as the [National Center on Leadership for the Employment and Economic Advancement of People with Disabilities \(LEAD\)](#), brings together a range of organizations, thought leaders and best-practice innovators to expand policy, employment, leadership and economic advancement opportunities and outcomes for all people with disabilities.