

State Treasurer's Report Resulting from LD 1412 of the 127th Legislature

Maine Options for the Achieve a Better Life Experience Act (ABLE)



Respectfully submitted: *Terry Hayes, Treasurer*

January 15, 2017

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1. LEGISLATION MANDATING REPORT

127th Legislature • LD 1421

Resolve, Directing the Treasurer of State To Study the Most Effective Options for Maine Residents To Participate in Tax-advantaged Savings Accounts for Persons with Disabilities

Sec. 1 Treasurer of State to study options for participation in federal Achieving a Better Life Experience Act of 2014. Resolved: That the Treasurer of State shall review federal law under the Achieving a Better Life Experience Act of 2014 relating to the establishment of tax-advantaged qualified savings programs for the benefit of qualified individuals with disabilities. The Treasurer of State shall research relevant federal regulations and the experience of other states that have established savings programs pursuant to the federal law and submit a report by January 15, 2017 to the joint standing committee of the Legislature having jurisdiction over taxation matters containing the results of the Treasurer of State's research and recommendations for the most cost-effective way to ensure that residents of the State are able to obtain the tax advantages of participation in qualified programs. The committee may submit a bill to the First Regular Session of the 128th Legislature related to the Treasurer of State's report.

2. INTRODUCTION

Definitions and FAQ Covering Account Description, Purpose, & Eligibility

1. What is an ABLE account?

ABLE Accounts, which are tax-advantaged savings accounts for individuals with disabilities and their families, will be created as a result of the passage of the Stephen Beck Jr., Achieving a Better Life Experience Act of 2014 or better known as the ABLE Act. The beneficiary of the account is the account owner, and income earned by the accounts will not be taxed. Contributions to the account made by any person (the account beneficiary, family and friends) will be made using post-taxed dollars and will not be tax deductible, although some states may allow for state income tax deductions for contribution made to an ABLE account.

2. Why the need for ABLE accounts?

Millions of individuals with disabilities and their families depend on a wide variety of public benefits for income, health care and food and housing assistance. Eligibility for these public benefits (SSI, SNAP, Medicaid) require meeting a means or resource test that limits eligibility to individuals to report more than \$2,000 in cash savings, retirement funds and other items of significant value. **To remain eligible for these public benefits, an individual must remain poor.** For the first time in public policy, the ABLE Act recognizes the extra and significant costs of living with a disability. These include costs, related to raising a child with significant disabilities or a working age adult with disabilities, for accessible housing and transportation, personal assistance services, assistive technology and health care not covered by insurance, Medicaid or Medicare.

For the first time, eligible individuals and their families will be allowed to establish ABLE savings accounts that will not affect their eligibility for SSI, Medicaid and other public benefits. The legislation explains further that an ABLE account will, with private savings, "secure funding for disability-related expenses on behalf of designated beneficiaries with disabilities that will supplement, but not supplant, benefits provided through private insurance, Medicaid, SSI, the beneficiary's employment and other sources."

3. Am I eligible for an ABLE account?

The ABLE Act limits eligibility to individuals with significant disabilities with an age of onset of disability before turning 26 years of age. If you meet this age criteria and are also receiving benefits already under SSI and/or SSDI, you are automatically eligible to establish an ABLE account. If you are not a recipient of SSI and/or SSDI, but still meet the age of onset disability requirement, you could still be eligible to open an ABLE account if you meet Social Security's definition and criteria regarding significant functional limitations and receive a letter of certification from a licensed physician. You need not be under the age of onset before the individual's 26th birthday.

4. Are there limits to how much money can be put in an ABLE account?

The total annual contribution by all participating individuals, including family and friends, for a single tax year is \$14,000. The amount may be adjusted periodically to account for inflation. Under current tax law, \$14,000 is the maximum amount that individuals can make as a gift to someone else and not report the gift to the IRS (gift tax exclusion). The total limit over time that could be made to an ABLE account will be subject to the individual state and their limit for education-related 529 savings accounts. Many states have set this limit at more than \$300,000

per plan. However, for individuals with disabilities who are recipients of SSI, the ABLE Act sets some further limitations. The first \$100,000 in ABLE accounts would be exempted from the SSI \$2,000 individual resource limit. If and when an ABLE account exceeds \$100,000, the beneficiary's SSI cash benefit would be suspended until such time as the account falls back below \$100,000. It is important to note that while the beneficiary's eligibility for the SSI cash benefit is suspended, this has no effect on their ability to receive or be eligible to receive medical assistance through Medicaid.

Additionally, upon the death of the beneficiary the state in which the beneficiary lived may file a claim to all or a portion of the funds in the account equal to the amount in which the state spent on the beneficiary through their state Medicaid program. This is commonly known as the "Medicaid Pay-Back" provision and the claim could recoup Medicaid related expenses from the time the account was open.

5. Which expenses are allowed by ABLE accounts?

A "qualified disability expense" means any expense related to the designated beneficiary as a result of living a life with disabilities. These may include education, housing, transportation, employment training and support, assistive technology, personal support services, health care expenses, financial management and administrative services and other expenses which help improve health, independence, and/or quality of life.

6. Can I have more than one ABLE account?

No. The ABLE Act limits the opportunity to one ABLE account per eligible individual.

7. Do I have to wait for my state to establish a program before opening an account?

No. While the original law passed in 2014 did stipulate that an individual had to open an account in their state of residency, this provision was eliminated by Congress in 2015. This means that regardless of where you might live and whether or not your state has decided to establish an ABLE program, you are free to enroll in any state's program provided that the program is accepting out of state residents.

To determine which state ABLE programs are accepting out of state programs, please refer to the individual state pages. Examples of state ABLE programs accepting enrollment nationwide include: Ohio, Nebraska, and Tennessee. An example of a state ABLE program only accepting instate residents would include the Florida ABLE United program.

8. Will states offer options to invest the savings contributed to an ABLE account?

Like state 529 college savings plans, states are likely to offer qualified individuals and families multiple options to establish ABLE accounts with varied investment strategies. Each individual and family will need to project possible future needs and costs over time, and to assess their risk tolerance for possible future investment strategies to grow their savings. Account contributors or designated beneficiaries are limited, by the ABLE Act, to change the way their money is invested in the account up to two times per year.

9. How is an ABLE account different than a special needs or pooled trust?

An ABLE Account will provide more choice and control for the beneficiary and family. Cost of establishing an account will likely be considerably less than either a Special Needs Trust (SNT) or Pooled Income Trust. With an ABLE account, account owners will have the ability to control their funds and, if circumstances change, still have other options available to them. Determining which option is the most appropriate will depend upon individual circumstances. For many

families, the ABLE account will be a significant and viable option in addition to, rather than instead of, a Trust program. For more information, the webinar on ABLE Accounts, Trusts, Financial and Benefits Planning is archived on our website along with its slides and transcript.

10. How Will I Know Which State ABLE Program is Right for Me?

We have provided a website to help you compare options: http://www.ablenrc.org/state-review#overlay-context=home

When comparing State ABLE programs you may want to consider the following questions in order to find a program that best meets your needs:

Opening an Account

•What proof will the ABLE program require for you to document in order to open an account or show that your disbursements are qualified expenses?

•Is there a minimum contribution to open an ABLE account?

•Is there a fee to open an account and, if so, how much is that fee?

Maintaining the Account and Fees

Is there a required minimum contribution to your account? If so, what is the amount?
 Are the fees front end loaded or are they reduced if you leave your funds invested for several years?

•Are there restrictions on how often you can withdraw funds from your account?

Investment Opportunities

•What are the investment options the state ABLE program offers? •Are the options likely to meet your needs for limiting risk with the growth of your contributed dollars to the ABLE account?

•Does the program offer any unique or value added program elements to help you save, contribute to your account, grow the account, and manage your invested dollars? •Does the state program offer any unique or value added program elements (such as a match or rewards program, financial literacy info or program for beneficiaries) to help you save, contribute to your account, grow the account, and manage your invested dollars? If so, what is it?

Unique to Your State

•Does your state have a program and, if so, do they offer a state income tax for contributions to their account?

•Is there a "debit card/purchasing card" available with the program? Are there added costs to this?

Source:

ABLE National Resource Center 1667 K Street, NW Suite 640 Washington, DC 20006 (202)296-2040 info@ablenrc.org http://www.ablenrc.org

3. POTENTIAL PARTICIPANTS

Internal OST Memo Regarding Potential Maine Participant Pool



TERRY HAYES Treasurer of State STATE OF MAINE OFFICE OF THE STATE TREASURER 39 State House Station, Augusta, ME 04333-0039

www.maine.gov/treasurer

KRISTI L. CARLOW Deputy State Treasurer

MEMORANDUM

To:	Terry Hayes, Treasurer	FROM:	Greg Olson, ADIO
RE:	Estimate of ABLE-eligible Mainers	DATE:	January 19, 2016

The US Census does not publish data explicitly identifying the number of disabled persons living in Maine, who were disabled by the time they reached the age of 26. In order to accurately identify the number of people meeting the previously mentioned criteria, it is necessary to extrapolate information, based on the Census Data. First we will determine the number of persons 26 years of age and younger who are disabled, and will then apply that disability rate to the older population, as a way of estimating the number of older Mainers who were identified as disabled by the time they reached age 26.

The US Census publishes an annual survey that estimates the number of people, by state, based on a variety of demographic characteristics. This survey, the American Community Survey, gives us several data points that are useful for calculating the number of disabled persons. For the American Community Survey 5-Year Estimate 2010-2014, there were 554 Mainers, under the age of 5, who were considered disabled. There were also 16,030 people from ages 5-17 who were considered disabled. Therefore we know the number of disabled person from ages 0-17 to be 16,584.

The American Community Survey also publishes the number of disabled persons between the ages of 18-34. This statistic is split up by gender. The statistics published in the survey are as follows: Total males 18-34 129,355, with 12,333 considered disabled. Total females 18-34 131,238 with 10,954 considered disabled. Combined, these figures show 260,593 Mainers, between the ages of 18-34, with a total of 23,287 who are considered disabled, for a disability rate of 8.9%. Next, we will apply that disability rate to the demographic cohorts, as reported by the census, for the ages <u>between 18-26</u>.

Per the American Community Survey 5-Year Estimate 2010-2014, we know the population of the 18-24 demographic was estimated to be 115,582. If we apply the disability rate of 8.9% to this population, we arrive at the number of disabled persons between the ages of 18-24 to be 10,286.

In order to determine the number of disabled persons that are 25 and 26 years old, we can extrapolate the population of this demographic, again using the American Community Survey 5-Year Estimate 2010-2014, we know the total population of Mainers from 25-29 years to be 74,398. If we assume this population is evenly distributed between the five numerical ages, we can assume the number of 25 and 26-year olds to be 29,759. If we then apply the disability rate for adults, previously determined to be 8.9%, we arrive at the number of disabled persons between the ages of 25-26 to be 2,648.

Totaling these amounts gives us an estimate of 29,518 disabled persons in Maine between the ages of 0-26, or 7.18%.

Memorandum to Terry Hayes, Treasurer January 19, 2016 Page 2

According to the American Community Survey, the number of people in Maine, over the age of 26 is roughly 917,487. If we apply the disability rate of 7.18% for those aged 0-26, we get an estimate of the older population who were likely disabled by the time they were 26. This estimate for those individuals would be 65,875.

Therefore, if we combine the totals for people aged 0-26 (29,518) and the estimate for people who are over 26, but likely disabled by the age of 26 (65,875) we get a combined total estimate of 97,393 disabled persons in Maine, whose disability occurred before the age of 26.

4. **RESEARCH PROCESS AND FINDINGS**

In 2016, Treasury's ABLE research included the following:

- Participation in bi-monthly telephonic meetings with ABLE national peers
- Participation in ABLE electronic list serve
- Attendance at various national ABLE workshop sessions
- Attended ABLE meeting of New England states in Montpelier, VT
- Telephonic consults with the National Disability Institute, Washington, DC
- Conference calls with the Social Security Administration (SSA)
- Meetings with Maine disability advocates and disabled citizens
- Meetings with representatives of several Maine banks and the Maine Bankers Association
- Meeting with the Maine Credit Union League

The federal ABLE Act is modeled on the federal law that created the 529 College Savings programs twenty years ago. The vast majority of the ABLE options available at this time are "assets under management" accounts. The goal is to save regularly, invest the savings to grow the assets, and benefit from compounding interest over several years. These "assets under management" accounts can be invested in a variety of funds depending on the level of risk the account owner chooses. The account owner pays fees to the fund(s) and to the program manager for their roles in potentially adding value to the account holder's investments. These types of accounts can only be successful if the account holders save regularly and leave their savings in the investment account in order to grow the assets. These investment accounts are generally regulated by the Securities and Exchange Commission, do not offer FDIC insurance, nor is the principal protected from loss due to market fluctuation.

Parents of young children with a disability are most likely to select an "assets under management" account. Disabled individuals whose monthly income is adequate to meet their routine needs might also favor this type of account.

Our research into the needs and anticipated uses of ABLE accounts by Maine's disabled citizens found that more Mainers would prefer a "transaction" account that could be used to accept deposits on a regular basis and allow frequent withdrawals for qualified expenses. These account holders envision using the ABLE account to subsidize their routine living expenses without reducing their federal SSI benefits. For example, a 30 year old disabled woman who is capable of living independently currently lives with her parents because she cannot afford the rent for her own apartment in a safe part of the city. Her parents can afford to subsidize her rent, but if they do so directly, the woman must report the subsidy amount as income, thereby reducing her Supplemental Security Income (SSI) benefits. If this woman opens an ABLE account, her parents can deposit the rent subsidy into that account and she can use that money to pay her rent without reduction in her SSI benefits. Such a transaction account would likely be eligible for Federal Deposit Insurance Commission (FDIC) insurance and principal balances would not be at risk to market fluctuation.

Remember, a "qualified disability expense" means any expense related to the designated beneficiary as a result of living a life with disabilities. These may include education, housing, transportation, employment training and support, assistive technology, personal support services, health care expenses, financial management and administrative services and other expenses which help improve health, independence, and/or quality of life. As of December 31, 2016 there were ten states that have ABLE programs available to qualified individuals: Alaska, Florida, Kentucky, Michigan, Nebraska, Ohio, Oregon, Rhode Island, Tennessee, and Virginia. Potential ABLE account owners can compare accounts here: <u>http://www.ablenrc.org/state-review#overlay-context=home</u> (see Appendix I)

The vast majority of these programs offer various types of "assets under management" accounts for qualified individuals. Some accounts include a pre-paid debit card, but using these accounts for routine living expenses is discouraged because the goal is to build up the money in the account in order to increase the benefit from investment of the account balance and compound interest. If account holders use the accounts as transaction accounts, the overall program will fail because the program managers and the fund managers will not generate enough fee income to cover their expenses.

Our research included detailed conversations with a variety of Maine banks and the Credit Union League of Maine. The question posed to them: Is there a retail banking product that could be adapted to qualify as an ABLE program and meet the needs of Maine's disabled citizens seeking a "transaction" account?

It appears that health savings accounts (HSA) are the existing bank product that most closely resembles a "transaction" ABLE account. The Treasurer continues to communicate with several Maine banks seeking to collaborate to design this type of account.

NOTE: There are federal reporting requirements SSA that will become active in the fall of 2017. These will be monthly electronic uploads from the financial institution offering the ABLE accounts to the SSA. The data required in the report has been identified and the digital requirements have been shared (see Appendix II). This reporting requirement is a challenge for program managers and financial institutions that are considering offering ABLE accounts to customers. It represents a cost to set up and potential monthly costs to address any problems that occur during the monthly data upload to the SSA. None of this reporting has occurred to date as the SSA is still doing the work needed internally to accept and store the data from the ABLE accounts.

5. 2017 OPTIONS FOR MAINE FAMILIES

A) Maine citizens can choose from among existing national ABLE programs (see Appendix I) The Treasurer can add a page to Treasury's website with links to the ABLE programs currently available in other states, with no preference noted among the choices. This option would not require legislative action and can be accomplished within existing resources.

There are two drawbacks to this option:

- i) There are no true "transaction" ABLE accounts currently available in other states.
- ii) The ABLE program administration will be primarily available via the internet, with no actual presence in Maine.
- B) Maine can contract with another state to offer a Maine-specific ABLE program

Ohio, Nebraska, and the multi-state Consortium all offer this option to other states. This option will require legislation authorizing the Treasurer to enter into a contract for this purpose. This option also would require a fiscal note. The potential costs vary (see Appendix I).

There are three drawbacks to this option:

- i) There are no true "transaction" ABLE accounts currently available in other states.
- ii) The ABLE program administration will be primarily available via the internet, with no actual presence in Maine.
- iii) The state will have to provide funds for program start-up.

C) Maine can offer a retail banking version of an ABLE account – transaction accounts

The Treasurer can continue to work with Maine's financial institutions to design a transaction account that both meets the federal requirements as an ABLE account and provides retail banking access to the account deposits on a daily basis to the account holder, including a debit card. This option will require the Legislature to give the Treasurer statutory authority to establish the program, to vet program proposals from bank(s), and to certify those ABLE program(s) that meet the federal requirements. The Treasurer would add to the existing web page links to certified programs where qualified individuals can open up a transactional ABLE account. This option can be accomplished within existing resources.

There are three drawbacks to this option:

- i) There may not be a financial institution in Maine that chooses to offer a "transaction" ABLE account to its customers.
- ii) It is likely to take much of 2017 to develop and deploy a retail ABLE banking product in Maine.
- iii) No other state is pursuing this path, so we may encounter unanticipated challenges that we are not able to identify at this time.

6. TREASURER'S RECOMMENDATION

It appears to be most prudent at this point to continue to work with our banking partners to identify and/or design a retail banking product that would allow for a "transaction" account while still offering an "assets under management" option through access to the nationally available ABLE programs. This would be a combination of options 4A and 4C from section 5 of this report.

This course of action will require legislation. Treasury staff is committed to work with the Legislature's Office of Policy and Legal Analysis staff to draft the legislation for the Committee's review. Treasury does not anticipate the need for additional resources in order to fulfill its role on this project.

Appendices

	A	C	D	E
1	State	Email	Web address	Telephone
2				
3	ALL	info@ablenrc.org	http://www.ablenrc.org/	(202) 296-2040
4				
5	National Plans			
6	Michigan	MIABLE@michigan.gov	http://www.miable.org/	1-844-656-7225
7				
8	Ohio	team@stableaccount.com	http://stableaccount.com/	1-800-439-1653
9				
10	Kentucky	team@stableaccount.com	http://stablekentucky.com	1-800-439-1653
11				
12	Nebraska	clientservices@enablesavings.com	https://treasurer.nebraska.gov/csp/able/	1-844-ENABLE4
13				
14	Tennessee	able.tn@tn.gov	http://abletn.gov/index.html	1-855-922-5386
15				
16	Oregon		http://oregonablesavings.com/	1-844-999-ABLE
17				
18	Virginia		https://www.able-now.com/	1-844-669-2253
19				
20	Consortium	1		
21	Illinois	able@illinoistreasurer.gov	http://www.illinoistreasurer.gov/Individuals/ABLE	1-312-814-2677
22	Rhode Island			
23	Missouri			
24	Alaska	ak.clientservice@savewithable.com	https://savewithable.com/ak/home/plan-benefits.html	1-888-609-8871
25	lowa			
26	Kansas			
27	Minnesota			
28	Nevada			
29	Pennsylvania			
30				
31	Resident Only Plans			
32		under construction		
33				
34		customerservice@ableunited.com	http://www.ableunited.com/	1-888-524-ABLE

APPENDIX I

Achieving a Better Life Experience (ABLE) Act Title XVI Provisions

Business Requirements and Technical Specification



Revision History

Date	Description	Author
9/27/2016	Draft version	S. Falcon
		J. Tilghman

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State Technical Specifications

1. Introduction

The purpose of the state data exchange of ABLE data is to assist the Social Security Administration (SSA) in its administration of the Supplemental Security Income (SSI) program by providing the data required for SSA to accurately determine eligibility of individuals for benefits provided under this program.

The state agency must send the ABLE data to SSA via a web service. This document contains the business requirements for providing the ABLE data and the steps necessary for web service consumers to connect to or to call the ABLE Web Service. In addition, it documents the ABLE Web Service for SSA's Office of Systems.

The reference to state agency in this document represents both the state agency and/or the state's ABLE contractor.

Note: SSA will not retain ABLE data on individuals that have no association with the SSI program.

1.1. Audience

The audience for this document is comprised of the state agency responsible for the systems/applications that need to connect to or consume the ABLE Web Service.

2. References

Computer Matching and Privacy Protection Act Agreement (CMPPA)

3. Definitions

Term	Definition
ABLE	Achieving a Better Life Experience
Designated beneficiary	ABLE account holder
HTTP	Hypertext Transfer Protocol
Schema	Structure of the data
SOA	Service Oriented Architecture
SOAP	Simple Object Access Protocol
SSI	Supplemental Security Income
Web service	Software that uses standard XML messaging system
Web service client	The client invokes the web service via an SOAP message and awaits an SOAP response
WSDL	Web Services Definition Language
XML	Extensible Markup Language

As used in this document:

4. Business Requirements and Rules

- The state agency must transmit the ABLE account balance and distribution data to SSA.
- The state agency must have a Secure Sockets Layer (SSL) certificate with SSA.

- The state agency's system shall support the following types of services:
 - Provide for electronic submission of the ABLE account data through a web service client.
 - o Receive responses electronically from SSA.
- The state agency system shall support retry and error processing for the web transmission.
- The state agency may receive responses from SSA regarding invalid data or missing mandatory data elements. The state agency will correct the discrepancies then resubmit the data to SSA.
- The state agency shall submit valid dates. Refer to section 5 for the definition of valid dates, per data element.
- The state agency shall not submit future dates.
- The state agency must transmit the ABLE account balance as of the first moment of the month and the prior month's ABLE account distribution data within the first seven calendar days of each month.
- Mandatory, conditional, and optional data elements can exist on each transmission. The state agency must transmit the mandatory data elements on each transmission. The conditional data elements are required if one is populated. The optional data elements are required if that information is available.
- The mandatory data elements can occur one time for each transmission.
- The conditional data elements can occur multiple times for each transmission.
- The optional data elements can occur one time for each transmission.
 - If the state agency knows Beneficiary First Name, Beneficiary Middle Name, and Beneficiary Suffix, they must be present in the transmission.
 - When the ABLE account is closed, the state agency must send the Account Closed Date to SSA.
- The state agency will receive one of the following responses from SSA:
 - an acknowledgement that SSA successfully received the transmission and all data elements passed surface level validation. Refer to section 6.5 for response code information.
 - an acknowledgement that SSA successfully received the transmission, but one or more data elements failed surface level validation. The exact data element and failure condition will be identified. The state agency should correct the error and resubmit. Refer to section 6.5 for response code information and section 6.6 for retry and error processing.
 - a notification of transmission failure. The state agency should work with SSA to resolve the error and resubmit. Refer to section 6.5 for response code information and section 6.6 for retry and error processing.

Note: The acknowledgement is not a validation of an individual's demographic data or that they are receiving SSI.

5. Data Elements

Legend:

- M Data is mandatory
- C Data is conditional
- O Data is optional

Data Elements	Data Element Name	Req	Data Type	SSA Max Length	Definition
Unique Identifier	uid	М	alpha/numeric/sp ecial characters	25	Each transmission report must have a unique identifier
Social Security Number	ssn	М	numeric	Fixed, 9	Social security number of designated beneficiary
Beneficiary Last Name	name:lastName	М	alpha/numeric – hyphen and apostrophe allowed	Up to, 20	Last name of designated beneficiary. If a single name person, the single name must go in the Beneficiary Last Name element
Beneficiary First Name	name:firstName	0	alpha/numeric – hyphen and apostrophe allowed	Up to, 15	First name of designated beneficiary
Beneficiary Middle Name	name:middleName	0	alpha/numeric – hyphen and apostrophe allowed	Up to, 15	Middle name of designated beneficiary
Beneficiary Suffix	name:suffix	0	alpha/numeric (characters must be either all alpha or all numeric; hyphen and apostrophe also allowed)	Up to, 4	Suffix of the designated beneficiary
Date of Birth	accountHolderDOB	М	dateTime	XML standar d length	Date of birth of designated beneficiary
Able Account Number	accountNumber	М	alpha/numeric	Up to, 20	ABLE account number must be alpha/numeric
Able Program State (state abbreviation)	programState	М	alpha	Fixed, 2	Postal Service standard of the State abbreviation for the state sponsoring the ABLE program
Last Name of Signature Authority	authorizedSignerName :lastName	0	alpha/numeric – hyphen and apostrophe allowed	Up to, 20	Last name of the person with signature authority when it is different from the designated beneficiary
First Name of Signature Authority	authorizedSignerName :firstName	0	alpha/numeric – hyphen and apostrophe allowed	Up to, 15	First name of the person with signature authority when it is different from the designated beneficiary
Middle Name of Signature Authority	authorizedSignerName :middleName	0	alpha/numeric – hyphen and apostrophe	Up to, 15	Middle name of the person with signature authority when it is different from the designated

Data Elements	Data Element Name	Req	Data Type	SSA Max Length	Definition
			allowed		beneficiary
Suffix of Signature Authority	authorizedSignerName :suffix	0	alpha/numeric (characters must be either all alpha or all numeric; hyphen and apostrophe also allowed)	Up to, 4	Suffix of the person with signature authority when it is different from the designated beneficiary
Account Opened Date	accountOpenedDate	М	dateTime	XML standar d length	The date the ABLE account was opened
Account Closed Date	accountClosedDate	0	dateTime	XML standar d length	The date the account closed if applicable
Month and Year of Balance	monthAndYearOfBalan ce	М	mmyyyy	XML standar d length	The month and year of the first moment of the month balance
Balance Amount (9,999,999.99)	firstOfMonthBalance	М	numeric	Up to, 12	The ABLE account balance as of the first moment of the month
Distribution Date	distribution:dateOfDistr ibution	С	dateTime	XML standar d length	The date the distribution was withdrawn from the ABLE account. Mandatory when an amount of distribution is present
Distribution Amount (9,999,999.99)	distribution:distribution Amount	С	numeric	Up to; 12	The amount of the distribution from the ABLE account. Mandatory when a date of distribution is present

6. Using the ABLE Web Service

This section details the information necessary to connect to the ABLE Web Service, including links and infrastructure information.

The ABLE Service R1.0 provides one operation: **sendABLEAccount**. It is used to submit ABLE account information to SSA.

6.1. Security

The secured access will require a Secure Sockets Layer (SSL) certificate with SSA.

6.2. Web Services Definition Language (WSDL)

WSDL is an XML-based language that defines the interface to the web service. The WSDL defines services as a collection of network endpoints (ports). The abstract definitions of ports and messages are separated from their concrete use or instance, allowing the reuse of these definitions. A port is defined by associating a network address with a reusable binding, and a collection of ports defines a service. Messages are abstract descriptions of the data being exchanged, and port types are abstract collections of supported operations. The concrete protocol and data format specifications

for a particular port type constitutes a reusable binding, where the operations and messages are then bound to a concrete network protocol and message format.i

For Service Oriented Architecture (SOA) Services, a WSDL is used in combination with Simple Object Access Protocol (SOAP) and an XML Schema to provide web services. A client program connecting to the web service can read the WSDL to determine what operations are available on the server. The client can then use SOAP to actually call an operation listed in the WSDL.

Component	Definition
binding	Specifies the protocol used to access a web service including SOAP, HTTP GET and POST, and MIME
definitions	The root element of the WSDL file. This area contains namespace definitions that used to avoid naming conflicts between multiple web services
fault	(<i>not shown</i>) Optionally specifies an error message returned from the operation
input	Specifies an input parameter to the operation using a previously defined message
message	Defines the data transferred by a web service operation, typically the name and data type of input parameters and return values
operation	Defines an operation that can be remotely invoked
output	Specifies the return values from the operation using a previously defined message
port	Defines an operation and its associated inputs and outputs
port type	Defines one or more operations provided by the web service
service	Defines a group of related operations
types	(not shown) Defines data types used by the service's messages

6.3. WSDL Infrastructure

```
<?xml version="1.0" encoding="UTF-8"?><wsdl:definitions
xmlns:wsdl="http://schemas.xmlsoap.org/wsdl/" name="able"
targetNamespace= "http://ssi.ssa.gov/able/"
xmlns:able="http://ssi.ssa.gov/able/"
xmlns:soap="http://schemas.xmlsoap.org/wsdl/soap/"
xmlns:tns="http://ssi.ssa.gov/able/"
xmlns:xsd="http://www.w3.org/2001/XMLSchema"
xmlns:xsns="http://ssi.ssa.gov/datatype/able/">
      <wsdl:types>
            <xsd:schema>
                  <xsd:import
namespace="http://ssi.ssa.gov/datatype/able/"
schemaLocation="Able.xsd"/>
            </xsd:schema>
      </wsdl:types>
      <wsdl:message name="sendABLEAccountRequest">
            <wsdl:part element="xsns:ableAccountRequest"
name="parameters"/>
      </wsdl:message>
```

```
<wsdl:message name="sendABLEAccountResponse">
            <wsdl:part element="xsns:ableAccountResponse"
name= "parameters"/>
      </wsdl:message>
      <wsdl:message name="pingRequest">
            <wsdl:part element="xsns:pingRequest" name="parameters"/>
      </wsdl:message>
      <wsdl:message name="pingResponse">
            <wsdl:part element="xsns:pingResponse" name="parameters"/>
      </wsdl:message>
  <wsdl:portType name="AblePortType">
      <wsdl:operation name="sendABLEAccount">
            <wsdl:input message="tns:sendABLEAccountRequest"
name="sendABLEAccountReguest"/>
            <wsdl:output message="tns:sendABLEAccountResponse"
name="sendABLEAccountResponse"/>
      </wsdl:operation>
      <wsdl:operation name="ping">
            <wsdl:input message="tns:pingRequest" name="pingRequest"/>
            <wsdl:output message="tns:pingResponse"
name="pingResponse"/>
      </wsdl:operation>
  </wsdl:portType>
  <wsdl:binding name="AbleSOAPBinding" type="tns:AblePortType">
    <soap:binding style="document"
transport="http://schemas.xmlsoap.org/soap/http"/>
    <wsdl:operation name="sendABLEAccount">
            <soap:operation soapAction="sendABLEAccount"</pre>
style= "document"/>
            <wsdl:input name="sendABLEAccountRequest">
                  <soap:body use="literal"/>
            </wsdl:input>
            <wsdl:output name="sendABLEAccountResponse">
                  <soap:body use="literal"/>
            </wsdl:output>
      </wsdl:operation>
      <wsdl:operation name="ping">
            <soap:operation soapAction="ping" style="document"/>
            <wsdl:input name="pingRequest">
                  <soap:body use="literal"/>
            </wsdl:input>
            <wsdl:output name="pingResponse">
                  <soap:body use="literal"/>
            </wsdl:output>
      </wsdl:operation>
  </wsdl:binding>
  <wsdl:service name="Able">
    <wsdl:port binding="tns:AbleSOAPBinding" name="AblePort">
      <soap:address location="https://devws.ba.ssa.gov:443/able"/>
    </wsdl:port>
  </wsdl:service>
</wsdl:definitions>
```

6.4. Extensible Markup Language (XML) Schema

```
<complexType name="AbleAccountRequestType">
             <sequence>
                   <element name="uid" minOccurs="1" maxOccurs="1">
                          <simpleType>
                                <restriction base="string">
                                       <maxLength value="25"/>
                                </restriction>
                          </simpleType>
                   </element>
                   <element name="name" type="able:FullNameType"</pre>
minOccurs="1" maxOccurs="1"/>
                   <element name="ssn" type="able:SSNType" minOccurs="1"</pre>
maxOccurs="1"/>
                   <element name="accountHolderDOB" type="dateTime"</pre>
minOccurs="1" maxOccurs="1"/>
                   <element name="accountNumber" minOccurs="1"</pre>
maxOccurs="1">
                   <simpleType>
                                <restriction base="string">
                                       <maxLength value="20"/>
                                </restriction>
                          </simpleType>
                   </element>
                   <element name="programState" minOccurs="1"</pre>
maxOccurs="1">
                   <simpleType>
                                <restriction base="string">
                                       <pattern value = "[A-Za-z] {2}"/>
                                </restriction>
                          </simpleType>
                   </element>
                   <element name="monthAndYearOfBalance" minOccurs="1"</pre>
maxOccurs="1">
                          <simpleType>
                          <restriction base="string">
                                <pattern value="([0] [1-9] | [1] [0-2]) {2}-</pre>
\d{4}"/>
                          </restriction>
                          </simpleType>
                   </element>
                   <element name="firstOfMonthBalance" type="decimal"</pre>
minOccurs="1" maxOccurs="1"/>
                   <element name="accountOpenedDate" type="dateTime"</pre>
minOccurs="1" maxOccurs="1"/>
                   <element name="distribution"</pre>
type="able:DistributionType" minOccurs="0" maxOccurs="unbounded"/>
                   <element name="accountClosedDate" type="dateTime"</pre>
minOccurs="0" maxOccurs="1"/>
                   <element name="authorizedSignerName"</pre>
type="able:FullNameType" minOccurs="0" maxOccurs="1"/>
             </sequence>
      </complexType>
      <complexType name="AbleAccountResponseType">
             <sequence>
                   <element name="uid" minOccurs="1" maxOccurs="1">
                                        10
```

```
<simpleType>
                               <restriction base="string">
                                     <maxLength value="25"/>
                               </restriction>
                         </simpleType>
                   </element>
                   <element name="response" type="able:ResponseType"</pre>
minOccurs="1" maxOccurs="1"/>
            </sequence>
      </complexType>
      <complexType name="DistributionType">
            <sequence>
                  <element name="dateOfDistribution" type="dateTime"</pre>
minOccurs="0" maxOccurs="1"/>
                  <element name="distributionAmount" type="decimal"</pre>
minOccurs="0" maxOccurs="1"/>
            </sequence>
      </complexType>
      <complexType name="PingRequestType">
            <sequence/>
      </complexType>
      <complexType name="FullNameType">
            <sequence>
                  <element name="firstName" minOccurs="1"</pre>
maxOccurs="1">
                         <simpleType>
                               <restriction base="string">
                                     <maxLength value="15"/>
                               </restriction>
                         </simpleType>
                  </element>
                  <element name="middleName" minOccurs="0"</pre>
maxOccurs="1">
                         <simpleType>
                               <restriction base="string">
                                     <maxLength value="15"/>
                               </restriction>
                         </simpleType>
                  </element>
                  <element name="lastName" minOccurs="1" maxOccurs="1">
                         <simpleType>
                               <restriction base="string">
                                     <maxLength value="20"/>
                               </restriction>
                         </simpleType>
                  </element>
                  <element name="suffix" minOccurs="0" maxOccurs="1">
                         <simpleType>
                               <restriction base="string">
                                     <maxLength value="4"/>
                               </restriction>
                         </simpleType>
                  </element>
            </sequence>
```

```
</complexType>
      <complexType name="ResponseType">
            <sequence>
                  <element name="returnCode" minOccurs="1"</pre>
maxOccurs="1">
                         <simpleType>
                               <restriction base="string">
                                    <maxLength value="4"/>
                               </restriction>
                         </simpleType>
                   </element>
                   <element name="reasonCode" minOccurs="1"</pre>
maxOccurs="1">
                         <simpleType>
                               <restriction base="string">
                                     <maxLength value="4"/>
                               </restriction>
                         </simpleType>
                   </element>
                   <element name="reasonMessage" minOccurs="1"</pre>
maxOccurs="1">
                         <simpleType>
                               <restriction base="string">
                                     <maxLength value="255"/>
                               </restriction>
                         </simpleType>
                  </element>
            </sequence>
      </complexType>
      <simpleType name="SSNType">
            <restriction base="string">
                  <pattern value="\d{9}"/>
                  <length value="9"></length>
            </restriction>
      </simpleType>
```

The following table provides information on the ABLE schema output:

Data Element Name	Definition	Usage
returnCode	Return code of response	Response
reasonCode	Reason code of response	Response
reasonMessage	Message giving information on the return and reason code	Response

6.5. Response Code Information

SSA will validate the transmission and will respond with the Unique identifier and the following:

Condition	Return Code	Reason Code	Reason Message
Successful execution	0000	0000	

Missing mandatory element - SSN	0004	INVL	SSN is required
Missing mandatory element - Last name	0004	INVL	Last name is required
Missing mandatory element - Date of birth	0004	INVL	DOB is required
Missing mandatory element - ABLE account number	0004	INVL	ABLE account number is required
Missing mandatory element - ABLE program state	0004	INVL	ABLE program state is required
Missing mandatory element - Month and year of balance	0004	INVL	Month and year of balance is required
Missing mandatory element - Account opened date	0004	INVL	Account opened date is required
Missing mandatory element - Blank Distribution amount when Distribution date is populated	0004	INVL	Distribution amount is required
Missing mandatory element - Blank Distribution date when Distribution amount is populated	0004	INVL	Distribution date is required
Security: Authentication	SECU	0401	Could not authenticate
Security: Authorization	SECU	0403	User does not have required roles
Unexpected error	9999	9999	

6.6. Retry and Error Processing

The state agency must implement retry and error logic.

Error conditions that can be retried:

- Web Service Internal Error Failure
- Ping Failure
- HTTP Errors:
 - o 404 NOT FOUND
 - o 408 REQUEST TIMEOUT
 - o 503 SERVICE UNAVAILABLE

Error conditions that can be fixed and retried:

• 0004 return code errors

The state agency will not send ABLE data during SSA scheduled maintenance activities. SSA will notify when the ABLE Web Service becomes available.

The state agency will resume sending ABLE data when SSA scheduled maintenance activities are complete.

Error conditions that cannot be retried; manual intervention is required:

- Signature Validation Failure
- Schema Validation Failure
- Security Authentication Failure
- Security Authorization Failure
- Invalid SOAP Action Failure
- All other 400 and 500 Series HTTP Errors not defined in this section

The state agency will resolve the error conditions that require manual intervention and retry.

7. Contact Information

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Jennifer Roberts	Project Manager	(410) 966-4940
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ⁱ Definition of WSDL was provided by Wikipedia,

http://en.wikipedia.org/wiki/Web Services Description Language