

Memorandum to Social Security Regarding Work Review for Blind Vendor

I participate in the Randolph-Sheppard Act program as a self-employed blind food vendor (POMS DI 10515.005 B. -

<https://secure.ssa.gov/apps10/poms.nsf/lnx/0410515005#b>). The program provides extensive unincurred business expenses to participating vendors, including free facility rent, utilities, management services, equipment, maintenance and repairs, cleaning services and other amenities. I understand that these unincurred business expenses should be deducted from the earnings of a self-employed SSDI beneficiary when computing countable income to determine whether s/he is performing SGA, along with impairment related work expenses (IRWE's) for which s/he pays and the value of unpaid help s/he receives (DI 10510.012 -

<https://secure.ssa.gov/apps10/poms.nsf/lnx/0410510012>). I also understand that only the countable income test is used to determine whether a blind self-employed beneficiary is performing SGA, and not the comparability and worth of work tests (DI 10510.020 - <https://secure.ssa.gov/apps10/poms.nsf/lnx/0410510020> and DI 10515.005 - <https://secure.ssa.gov/apps10/poms.nsf/lnx/0410515005>).

The Randolph-Sheppard Act program also provides income from vending machines to vendors, even though the machines are not "serviced, operated or maintained" by the vendors. DI 10515.005 D. - <https://secure.ssa.gov/apps10/poms.nsf/lnx/0410515005#d> specifies that this vending machine income is excluded from a vendor's earnings when evaluating whether s/he is performing SGA.

Thank you.

Name

Date

Signature