



Disability Law Center

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Social Security Administration, OLCA
Attn: Reports Clearance Director
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6401 Security Blvd., Baltimore, MD 21235

RE: Ticket to Work Program Evaluation [Docket No: SSA–2026–0002]

Submitted via Reginfo.gov at: Federal Register: Agency Information Collection
Activities: Comment Request

Dear Reports Clearance Director:

The Disability Law Center appreciates the opportunity to comment on the proposed evaluation of the Ticket to Work Program issued in the February 2, 2026, Federal Register. We welcome the opportunity to highlight key issues as you move forward with evaluating the critical Ticket to Work Programs that support people with disabilities seeking employment and self-sufficiency.

As the Protection and Advocacy (P&A) agency for Massachusetts, the Disability Law Center administers the Protection and Advocacy for Beneficiaries of Social Security (PABSS) program. We look forward to demonstrating the effectiveness of the PABSS program in helping SSI and SSDI beneficiaries pursue work. Each year, the Disability Law Center completes Program Performance Reports (PPRs), providing detailed information on the services delivered and outcomes achieved.

These comments will be divided into two categories. The first part will be comments and suggestions that apply equally to the evaluation of all the distinct parts of the Ticket to Work program while the second part will focus on comments specific to the PABSS program.

Overarching Comments

The evaluation must use plain, accessible language and be conducted in a manner that is fully accessible to people with disabilities. It is likely that many ticketholders, and some PABSS and WIPA staff, are individuals with disabilities. If surveys or interviews use complex wording or inaccessible formats, the resulting data will be unreliable.

The Protection and Advocacy System for Massachusetts



To ensure meaningful participation:

- Questions should use clear, plain language and avoid unnecessary acronyms or complex jargon.
- Surveys must be tested for accessibility, including screen reader compatibility.
- Interviews should include accommodations when needed, such as sign language interpreters.

Confidentiality is also essential so that respondents feel comfortable providing candid, accurate information. The Social Security Administration has strong requirements around confidentiality, and this confidentiality requirement should extend to the data collected through the evaluation surveys and interviews.

The evaluation should also be comprehensive. Ticketholders have diverse experiences (different types of disabilities, education or employment experiences, age of onset of disability, types of accommodation needed or discrimination encountered, etc.) and the Ticket to Work components operate differently. A single set of survey questions cannot evaluate all programs effectively; instruments must be tailored to the program being assessed.

PABSS Specific Comments

The PABSS program provides free, confidential legal advocacy to help disabled beneficiaries remove barriers to employment or self-employment. PABSS provides a range of services to help beneficiaries secure, maintain, and regain employment, including information, referrals, advocacy, and legal consultation. This differs from the Work Incentives Planning & Assistance (WIPA) program, which focuses on explaining how increased earnings affects benefits and healthcare coverage.

The Disability Law Center already reports extensive facts (data, information, work examples and outcomes) in the annual PABSS PPRs. The reported data may help inform the evaluation, but evaluators should note that the PABSS PPR has been inconsistent in its questions over the timeframe of this evaluation. Starting in Fiscal Year 2024 a number of changes were made to the PABSS PPR, and so we caution the evaluators that because questions have not been consistent, the data cannot always be compared across the years.

Like all P&A organizations with a PABSS grant award, The Disability Law Center must adhere to strict programmatic, administrative, and financial requirements outlined by Social Security Administration's Terms and Conditions (T&C) document. Thus, it is important that the survey questions reflect the services outlined by the T&C, which define what services PABSS programs are permitted to provide. Evaluating the PABSS program on services outside the scope of the T&C would be inappropriate and misleading.

Individuals may seek services from a P&A like the Disability Law Center for a variety of reasons. They may not know what a P&A is and may only know that they called or were referred to the Disability Law Center. They may also not be aware of the name of the different P&A services provided or which they have received. To garner the best responses about PABSS services from surveyed beneficiaries, it is therefore important to provide the questions in plain language. Include clarity about PABSS services as it pertains to addressing employment barriers for SSA beneficiaries and providing guidance on one's SSA benefits and work, so that the individual can comment whether they are aware or unaware of, have received or not received, and/or if an outcome occurred through PABSS. Ensuring that you are asking the individual about PABSS services as it relates to SSA benefits and employment barriers will help respondents accurately report whether they received PABSS services and what outcomes resulted.

Thank you for this opportunity to comment.

If you have questions, please contact Linda Landry, 617-315-4611.

Sincerely,

A handwritten signature in blue ink that reads "Linda L. Landry". The signature is written in a cursive, flowing style.

Linda L. Landry
Senior Attorney
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