



Disability Rights Iowa

LEGAL PROTECTION AND ADVOCACY

March 4, 2026

Social Security Administration, OLCA
Attn: Reports Clearance Director
Mail Stop 3253 Altmeyer
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:

Disability Rights Iowa 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 in Iowa that 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, Disability Rights Iowa 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.

To ensure meaningful participation:

 Advocating for justice. Advancing human and legal rights. Protecting Iowans with disabilities. 

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- 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 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 accommodations 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.

Disability Rights Iowa 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, Disability Rights Iowa 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 Disability Rights Iowa for a variety of reasons. They may not even know what a P&A is and may only know the name, Disability Rights Iowa itself. They may also not be aware 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 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.

Finally, we are concerned that the Federal Register lists forty-six (46) respondents, although there are fifty-seven (57) P&A agencies with the PABSS program. Here is the list of the 57 states and territories that have a P&A agency - https://www.ndrn.org/about/ndrn-member-agencies/?search=&agency_location=all. There is no explanation for the omission. All PABSS funded agencies should be included in the evaluation to ensure complete and accurate representation.

If you have questions, please contact Disability Right Iowa's Executive Director, Catherine Jonson

Sincerely,



Catherine E. Johnson
Executive Director
cjohnson@driowa.org