

March 2, 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](#)

Sent via email to: OR.Reports.Clearance@ssa.gov

Dear Reports Clearance Director:

Disability Rights North Carolina (DRNC) 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) organization in North Carolina that administers the Protection and Advocacy for Beneficiaries of Social Security (PABSS) program, DRNC looks forward to demonstrating the effectiveness of the PABSS program in helping SSI and SSDI beneficiaries pursue work. Each year, DRNC completes Program Performance Reports (PPRs), providing detailed information on the PABSS services delivered and outcomes achieved.

These comments will be divided into two categories. First, comments and suggestions that apply to the evaluation of all parts of the Ticket to Work program and second, 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 Work Incentives Planning and Assistance (WIPA) staff, are people with disabilities. If surveys or interviews use complex wording or inaccessible formats, the resulting data will be unreliable.

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 respondents feel comfortable to provide candid, accurate information. The Social Security Administration (SSA) 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 WIPA program, which focuses on explaining how increased earnings affects benefits and healthcare coverage.

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

Like all P&A organizations that receive a PABSS grant award, DRNC must adhere to strict programmatic, administrative, and financial requirements outlined by SSA'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 seek DRNC's services for a variety of reasons and, while they know the name "Disability Rights North Carolina," they often do not understand words like "P&A" and "PABSS." Indeed, few individuals DRNC assists know the exact P&A funding source used to fund their services, let alone their requirements. To garner the best responses from surveyed beneficiaries, it will be important to clarify that PABSS services are used to address employment barriers for SSA beneficiaries and provide concrete examples and guidance on the type of work that is typically done under the program in plain language. This will give beneficiaries the opportunity to comment on PABSS services and outcomes, even if they are unaware of which grant was used to fund their services.

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.

Thank you for considering our perspective. If you would like additional information, please contact Disability Rights North Carolina CEO, Virginia Knowlton Marcus, at Virginia.KnowltonMarcus@DisabilityRightsNC.org.