



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 South Carolina (DRSC) appreciates the opportunity to comment on the proposed evaluation of the Ticket to Work Program issued on February 2, 2026, in the Federal Register. We welcome the opportunity to highlight key issues as you evaluate the critical Ticket to Work Programs that support people with disabilities in seeking employment and self-sufficiency.

As the Protection and Advocacy (P&A) agency in South Carolina that administers the Protection and Advocacy for Beneficiaries of Social Security (PABSS) program, DRSC looks forward to demonstrating the effectiveness of the PABSS program in helping SSI and SSDI beneficiaries pursue work. Each year, DRSC 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:

- 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 accommodation when needed, such as sign language interpreters.

Confidentiality is crucial to ensure that respondents feel comfortable providing candid and accurate information. The Social Security Administration has strict confidentiality requirements, and these should also apply to data collected through evaluation surveys and interviews.

The evaluation should be thorough and comprehensive. Ticket holders have a wide range of experiences, including various types of disabilities, different educational and employment backgrounds, the age at which they experienced their disability, the kinds of accommodations they require, and the discrimination they may have faced. Additionally, the components of the Ticket to Work program operate differently. Therefore, a single set of survey questions is insufficient to effectively evaluate all programs; evaluation tools must be tailored to each 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 affect benefits and healthcare coverage.

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

Like all P&A organizations with a PABSS grant, DRSC must adhere to strict programmatic, administrative, and financial requirements outlined in the 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 DRSC for various reasons. They might not be familiar with what P&A is and may only recognize the name DRSC. Additionally, they may not know about the different P&A services available or which ones they have received. To elicit the best responses from surveyed beneficiaries regarding PABSS services, it is crucial to phrase the questions in plain language. The questions should clearly explain how PABSS services address employment barriers for SSA beneficiaries and provide guidance on SSA benefits and work. This clarity will allow individuals to indicate whether they are aware of the services, whether they have received them, and if any outcomes have resulted from their experience with PABSS. By asking about PABSS services in relation to SSA benefits and employment barriers, you will help respondents accurately report on the services they received and the outcomes that followed.

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 with 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 Beth Franco, franco@disabilityrightssc.org.

Sincerely,

A handwritten signature in black ink that reads "Beth Franco". The signature is written in a cursive, flowing style.

Beth Franco
Executive Director
Disability Rights South Carolina