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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 California 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 California 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 California 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 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 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 California 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.

### **WIPA Specific Comments**

The WIPA program provides free, confidential benefits counseling to help disabled beneficiaries return to employment or self-employment. Disability Rights California already reports extensive facts (data, information, work examples and outcomes) in quarterly performance reports directly to the Social Security Administration. The data reported includes outreach, training needs, program highlights, and case success stories. The reported data may help inform the evaluation. WIPA quality of services is also maintained through a network of accountability partners such as 'National Association of Benefits Work Incentives Specialists' and the 'National Training and Data Center' through the Virginia Commonwealth University.

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

Individuals may seek services from Disability Rights California for a variety of reasons. They may not even know what a P&A is and may only know the name, Disability Rights California 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 and WIPA services from surveyed beneficiaries, it is important to provide the questions in plain language.

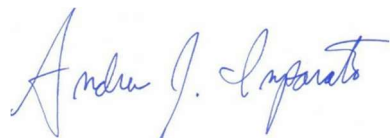
Include clarity about PABSS services as it pertains to addressing employment barriers for SSA beneficiaries and providing guidance on one's SSA benefits and work, so that the individual can comment whether they are aware or unaware of, have received or not received, and/or if an outcome occurred through PABSS. Likewise, for WIPA, to garner the best responses include clarity to sampled beneficiaries about the services WIPA provides regarding benefits counseling, including what work incentives are available to beneficiaries to allow them to return to work.

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. Likewise, for WIPA services, questions should be related to quality of benefits counseling provided focused on timely and accurate guidance of how earnings interact with Social Security, SNAP, housing, veterans, and healthcare benefits

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](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 Andy Imparato, CEO of Disability Rights California.

Sincerely,



Andrew J. Imparato  
Chief Executive Officer