



Submitted via Reginfo.gov

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]

Disability Rights Pennsylvania (DRP) appreciates the opportunity to comment on the proposed evaluation of the Ticket to Work Program. 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 Pennsylvania 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, DRP 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.

Avoiding selection bias in remote data collection is essential. Because SSA notes increased remote service delivery as a major program change, the evaluation's own data collection methods must not exclude beneficiaries who face technology, literacy, language, or disability-related barriers. SSA should offer telephone options, language access, and accommodations by default, and should document the steps taken to ensure participation by underserved populations.

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.

Because beneficiaries may discuss sensitive legal issues (including discrimination, retaliation concerns, and housing insecurity), SSA should clearly explain confidentiality protections, data storage/de-identification, and limits on disclosure in plain language at recruitment and consent. Strong confidentiality safeguards are necessary for data reliability.

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.

Program distinctions should be clear in all instruments. Provider surveys and beneficiary interviews should explicitly distinguish between Ticket to Work

services, WIPA counseling, and PABSS legal advocacy so respondents can accurately attribute what services they received and what outcomes resulted.

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.

DRP 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.

Ensure the evaluation measures PABSS-appropriate outcomes. PABSS effectiveness should be assessed using outcomes consistent with legal advocacy and barrier removal (e.g., access to VR/EN services secured, accommodations obtained, discriminatory practices addressed, transportation or housing barriers resolved, and work-related benefits problems addressed to prevent job loss). Reliance on earnings or benefit-exit measures alone will understate the impact of PABSS services.

Like all P&A organizations with a PABSS grant award, DRP 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.

SSA should pilot-test the PABSS provider survey with multiple P&A agencies of different sizes and service models to validate the burden estimate and to identify

opportunities to minimize burden (e.g., skip logic, pre-populated items from existing SSA grant/PPR reporting, and limiting narrative fields).

Individuals may seek services from DRP for a variety of reasons. They may not even know what a P&A is and may only know the name, Disability Rights Pennsylvania (DRP) 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) PABSS respondents, although there are fifty-seven (57) P&A agencies that administer PABSS. SSA should clarify the discrepancy and include all 57 PABSS grantees in the provider survey universe (or clearly explain any exclusion criteria and how resulting bias will be mitigated). Including all PABSS-funded agencies is necessary for complete and accurate representation.

Thank you for considering our comments. Please contact Dale Verchick, Director of Public Policy with any questions.

Respectfully submitted,

Jennifer Garman
Chief Executive Officer
Disability Rights Pennsylvania