# PUBLIC SUBMISSION

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Comment from Advance to Work

## Submitter Information

**Email:** rpatino@advancetowork.com
**Organization:** Advance to Work

## General Comment

Comments on Docket No. SSA-2026-1090
Agency Information Collection Activities and Reporting Requirements
To: OR.Reports.Clearance@ssa.gov
Subject: Comments on Docket No. SSA-2026-1090

Dear Reports Clearance Director:
On behalf of our Employment Network, thank you for the opportunity to comment on the proposed revisions and extensions under Docket No. SSA-2026-1090.
As a Ticket to Work Program provider, we support efforts to improve administration and reduce unnecessary burdens on beneficiaries, Employment Networks (ENs), Vocational Rehabilitation agencies, and other stakeholders.

We respectfully submit the following recommendations.

Administrative Burden Reduction
We support streamlined, modern information collection. Consolidating duplicate requirements, simplifying forms, and improving electronic submissions would let providers devote more resources to beneficiary support and employment outcomes.

Expand Provider-Assisted Reporting Options
While technological solutions can improve efficiency, not all beneficiaries are able to fully utilize online reporting systems.
Some beneficiaries have limited digital access or skills, disabilities, transportation barriers, or work schedules that make online reporting, office visits, and repeated follow-up difficult.
ENs help beneficiaries understand work incentives, gather wage records, meet reporting requirements, and communicate with SSA. SSA should use ENs as trusted reporting partners to improve access and efficiency.

Establish a Dedicated Employment Network Reporting Cadre
One of the most significant operational concerns affecting Ticket to Work providers is the handling of information submitted by Employment Networks.
ENs routinely submit wage records, employer details, job start and stop dates, changes in hours or earnings, and updated contact information. Timely processing supports accurate records, work incentive decisions, beneficiary communications, and overpayment prevention.

In our experience, EN submissions are often delayed or never reflected in beneficiary records. ENs then resubmit the same information while beneficiaries receive mail at old addresses, wait for decisions, or incur avoidable overpayments despite timely reporting.

Delayed wage updates can cause incorrect benefit payments and preventable overpayments. Beneficiaries, EN staff, and SSA personnel may then spend months on notices, appeals, waivers, document requests, and record corrections that timely processing could have avoided.

We request that SSA recognize ENs as trusted partners and establish a dedicated EN reporting cadre or centralized unit to receive, review, process, and confirm information submitted by authorized ENs.
Such a process should include the ability to receive and process:
• Wage verifications and changes in earnings or work hours
• Job start and stop dates and employer changes
• Beneficiary addresses, phone numbers, and email addresses
• Other work incentive information submitted by ENs

Implementing such a process would:
• Reduce preventable overpayments, appeals, waivers, and reconsiderations
• Improve the accuracy and timeliness of earnings, employment, and contact records
• Reduce burdens on beneficiaries, ENs, and SSA field offices
• Limit unnecessary office visits so beneficiaries can focus on employment
• Strengthen communication, collaboration, efficiency, and customer service
ENs already collect and verify much of this information. Using it effectively would improve records and communication, reduce administrative costs and overpayments, and help beneficiaries remain focused on work.

Review Burden Estimates
SSA should validate burden estimates for Ticket to Work reporting. Gathering wage records, contacting beneficiaries, preparing submissions, monitoring status, resubmitting information, and resolving discrepancies often take longer than current estimates suggest.
Future assessments should include ENs so estimates reflect real-world operations.

Continue Stakeholder Engagement
Continued engagement with ENs, Vocational Rehabilitation agencies, beneficiaries, advocates, and other partners will help future requirements support program integrity and effective service delivery.

Conclusion
We support modernized reporting and better administration. We strongly encourage SSA to recognize ENs as trusted reporting partners and create a formal process for acting on their submissions.
ENs already verify critical wage, employment, work activity, and contact information. A reliable process for using it would protect beneficiaries, reduce field office workloads and overpayments, improve service, and strengthen the Ticket to Work Program.