On behalf of Hawkeye Employment Networks, thank you for the opportunity to provide feedback on the proposed revisions under Docket No. SSA-2026-1090. As an Employment Network (EN) with many years of successful experience under our own contracts, we appreciate the opportunity to share insights grounded in extensive front-line operations.

Our involvement with the Ticket to Work (TTW) program has given us direct insight into the operational realities of Section 7: Ticket to Work Self-Sufficiency Program and its associated reporting requirements.

Inter-Agency Data Sharing & Administrative Efficiency

We strongly support expanding information sharing across ENs, State Vocational Rehabilitation (VR) Agencies, SSA Operations, the Ticket Program Manager (TPM), and related contractors.

Currently, ENs face a heavy administrative burden driven by duplicate and repetitive requests for information already submitted, along with siloed reporting requirements across multiple SSA departments. Establishing cross-departmental data sharing would immediately streamline processes and improve overall program outcomes. Specifically, integration would:

- Accelerate Processing Times: Reduce delays in case updates and reviews.
- Reduce errors and overpayments of ENs and Ticketholders
- Leverage EN Capabilities: Allow ENs to securely submit wage data, income verification, and relevant documentation on behalf of Ticketholders.
- Decrease Beneficiary Confusion: Minimize the frequent inquiries Ticketholders make to SSA field offices, the TPM, and ENs regarding conflicting letters, mismatched records, or conflicting online portal information.

As trusted, vetted partners, ENs possess the infrastructure, technology, and incentives to ensure requested data is delivered accurately and promptly to SSA. Utilizing ENs as direct reporting channels relieves pressure on both beneficiaries and SSA staff.

Empowering Beneficiaries Through Accurate Information

Providing ENs with real-time, accurate access to beneficiary records, including current eligibility, work incentive tracking, and overpayment balances, is critical. Access to precise data transforms benefits counseling from a series of educated guesses into actionable, dependable guidance. When Ticketholders have confidence that their outlook is clear and up to date, their security in pursuing employment increases significantly, driving higher TTW participation and long-term earnings.

Logistical & System Recommendations

To resolve these systemic bottlenecks, we recommend:

1. A Shared Intake Portal: Develop a secure, centralized system accessible by SSA, VR agencies, and contracted ENs to input and access Ticketholder data.

2. Preventing Duplicative Workflows: Any improvement or modification relies heavily on preventing bottlenecks and sharing data in real-time across the entire beneficiary system to prevent competing work queues.
3. Automated Data Tracking: Automate the receipt and processing of submitted data such as reviews, income, and other relevant information so data can be tracked seamlessly, reducing the occurrence and severity of overpayments.

Operational Inclusion: Implementation Teams

We strongly recommend including EN and State VR representatives on the implementation teams tasked with designing and updating reporting systems. Incorporating front-line input ensures practical workflows, prevents unintended administrative friction, saves valuable resources, and fosters strong partner buy-in across the TTW program. Inclusion of front-line representatives to assist with this process will improve the development and implementation of these changes.

For example, Docket No. SSA-2026-1090 includes assumptions that could be improved if trusted 3rd parties, such as ENs, are included in the process. Throughout the recommendations, estimated burdens are used. Partnering with ENs could assist SSA in identifying shared times that closely resemble actual burden times. Additionally, consolidating forms does not guarantee real burden times decrease. Consolidating forms will not decrease burden times if the new form versions create respondent fatigue due to question density, content density, or question duplication. SSA must review each process, question, and form to ensure actual burden times go down.

Systemic Reform

While minor regulatory adjustments provide temporary relief, achieving lasting program efficiency requires a fundamental, overarching modernization of the system rather than incremental fixes. Executing a structural overhaul of this scale will ultimately require legislative authorization and congressional approval.

The convening of the new Congress in January creates a strategic window for SSA and policymakers to pursue this necessary modernization. We strongly encourage Congress to solicit direct testimony and input from local ENs and front-line stakeholders to push for real structural changes. Local ENs hold valuable operational insights regarding system barriers and are uniquely positioned to inform legislation that ensures long-term efficacy and ROI for the TTW program.

Conclusion

Hawkeye Employment Networks remains deeply committed to empowering Social Security beneficiaries as they pursue financial independence through employment. However, realizing the full potential of the Ticket to Work program requires moving toward a unified, modern infrastructure. By establishing cross-agency data sharing, automating wage tracking, and securing congressional support for a comprehensive system modernization, the Social Security Administration can eliminate administrative

friction, protect beneficiaries from overpayment, and significantly improve long-term employment outcomes.

We thank you for considering our recommendations and welcome the opportunity to partner in building a more effective, transparent, and resilient program.