Public Comment on Docket No. SSA-2026-1090

Agency Information Collection Activities and Reporting Requirements

From: National Employment Network Association
To: OR.Reports.Clearance@ssa.gov
Date: November 16, 2026
Subject: Comments on Docket No. SSA-2026-1090
Dear Reports Clearance Director:

On behalf of the National Employment Network Association, thank you for the opportunity to comment on the proposed revisions and extensions under Docket No. SSA-2026-1090. Our members are Employment Networks (ENs) including Private Organizations, American Job Centers, and State Vocational Rehabilitation Agencies, that serve Ticket to Work beneficiaries every day. We offer the recommendations below to improve reporting accuracy, strengthen program integrity, reduce overpayments and help beneficiaries return to work with confidence.

1. Treat Employment Networks as Partners

Employment Networks are vetted, screened, contractually bound entities performing a function Congress assigned to the private sector but that remains, SSA's responsibility. Currently, information flows poorly in both directions:

- **Information the agency will not give ENs.** Benefits planning queries arrive outdated, inaccurate or incomplete. The provider's portal does not connect in any meaningful sense to the systems that hold the answers. The result is case management conducted from the beneficiary's recollection, which is the least reliable source available.
- **Information ENs cannot provide to SSA**. ENs have accurate, current, verified earnings documentation and are barred from submitting it. Any other person may report a beneficiary's earnings to SSA, but the professional employed to track that person's work activity may not. The beneficiary must therefore report the same earnings twice, once to SSA and once to the provider, through two different channels and in two different formats. SSA's own Social Security Bulletin has identified partnership with employment service providers as one of two promising interventions for preventing overpayments. (Work Overpayments Among New Social Security Disability Insurance Beneficiaries, by Denise Hoffman, Monica Farid, John T. Jones, Serge Lukashanets, and Michael T. Anderson, Social Security Bulletin, Vol. 84 No. 1, 2024)

2. Expand Provider-Assisted Reporting Options and Establish a Dedicated Employment Network Reporting Cadre.

While technological solutions can improve efficiency, not all beneficiaries are able to fully use online reporting systems. Some 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.

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

3. A Digital SSA-3288 and an Immediate BPQY

The largest failure in the program happens immediately in the return-to-work process. A beneficiary who has decided to choose work reaches a provider, and the encounter opens with a paper release form. Then everyone waits. It can take weeks or months to receive the Benefits Planning Query Report. Without a complete and accurate Benefits Planning Query Report, the provider cannot answer the only questions the beneficiary has: what happens to my check, what happens to my Medicare, how much can I earn, and what happens if the job does not work out. We recommend that SSA:

- **Bring the SSA-3288 online.** Provide identity-proofed digital execution of the disclosure authorization, submitted and accepted in the moment, with a confirmation both the beneficiary and the provider can see. SSA already authenticates individuals through its own online accounts and already accepts electronically executed authorizations in other contexts. The obstacles are implementation, not principle.
- **Release the BPQY the moment the authorization is accepted.** Once a valid digital SSA-3288 is on file, the query should generate and post to the authorized provider

immediately rather than entering a queue. The document is assembled from data the agency already holds; nothing about producing it requires human adjudication.

4. The EN as Deputized Overpayment-Prevention Advocate

The agency has periodically floated the idea of a "beneficiary advocate" without ever settling on what one would do. The concept has always been awkward on the entitlement side, where the relationship is inherently adversarial because a denial may be coming. On the return-to-work side there is no such tension. The beneficiary already has entitlement, the agency actively wants the outcome, and interests are aligned. This is precisely where an advocate function makes sense, and where a party already exists to perform it: the Employment Network.

5. Mandatory Training for SSA Employees on the Ticket Program

SSA generally requires training for its employees on the Ticket program. This training is often forgotten or confused by the time an employee speaks with a beneficiary. SSA should clarify and expand this training to include telephone desk aids and fact sheets for every field office. That training should highlight what the program does for beneficiaries, not merely how to process it. A beneficiary who is discouraged from working by SSA staff will not contact a provider.

6. Modernize Processes to Streamline Determinations

SSA's payment processing centers, originally established during World War II as "Area Offices," were created to solve an administrative crisis: the overwhelming volume of paper records and manual math required by exploding beneficiary rolls.

A comprehensive audit by the SSA Office of the Inspector General (OIG) found that the backlog of unaddressed pending actions at the payment processing centers climbed to record numbers, resulting in more than $1.1 billion in improper payments. A large portion of this backlog directly involves delayed or unprocessed wage reports and work incentive information, such as Trial Work Periods and Extended Periods of Eligibility. When the payment center fails to process work updates for months or even years, the software continues paying full benefits, resulting in ballooning overpayments that the beneficiary is ultimately asked to pay back. (*Record-breaking Backlog Increases Improper Payments by Over $1B*, Social Security Administration, Office of the Inspector General, August 8, 2024.)

7. Accuracy of Reporting Burden and Opportunities for Improvement

NENA supports collecting information necessary for meaningful oversight of the Ticket to Work program, including verifying services, determining payment eligibility, and

maintaining program integrity. We recommend that SSA validate its estimated reporting burdens with ENs of varying sizes and operating models to ensure those estimates reflect the full effort required to prepare accurate submissions. Specifically, SSA estimates 20 minutes for Proof of Relationship, 40 minutes for a portal payment request, two hours for the Annual Performance Outcome Report, and three hours for a site-visit questionnaire. SSA should clarify whether these estimates include reviewing instructions, gathering and reconciling supporting records, coordinating staff input, checking accuracy, and responding to requests for clarification, in addition to completing the form or portal entry.

We also encourage SSA to review these collections for duplicative requests and allow ENs to reuse or reference information already submitted when it remains current and meets the collection's purpose. Clear, consistent instructions identifying the required documentation and reporting period, electronic submission confirmations, and targeted requests for missing information would improve the quality and usefulness of the information collected while reducing avoidable follow-up, duplicate reporting, and unnecessary administrative burden on ENs and beneficiaries.

Conclusion

Employment Networks share SSA's goals of accurate records, prevented overpayments, and more beneficiaries working successfully. By letting ENs report verified information, giving them timely access to the data they need, and modernizing the first steps of the process, SSA can reduce burden on beneficiaries and on the agency itself. We appreciate your consideration and welcome the opportunity to discuss these recommendations.

Respectfully submitted,

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