RE: Docket No. SSA-2026-1090

Public Comment Regarding SSA Reporting, Accountability, and Beneficiary Treatment

I am submitting this comment based on my 20 years of experience assisting Social Security disability beneficiaries, including my work with the Ticket to Work program and as a Community Partner Work Incentives Coordinator (CPWIC).

Throughout my career, I have helped individuals understand their benefits, work incentives, reporting responsibilities, and how employment affects their financial stability. Unfortunately, I have also witnessed how SSA's complicated reporting procedures, processing delays, and interactions with some local offices create unnecessary barriers for beneficiaries and those assisting them.

Reporting Should Be Simple and Accessible

SSA expects beneficiaries to report employment, earnings, and changes in circumstances accurately and timely. Yet beneficiaries may submit documentation, make repeated follow-up calls, and still discover months later that their information was not properly processed.

These situations can result in incorrect payments, benefit interruptions, and substantial overpayments, even when individuals have made every effort to comply.

SSA should recognize that reporting burdens extend beyond completing forms. They include gathering documentation, waiting for assistance, repeated calls, resubmitting records, and correcting errors.

Respectful Treatment and Professional Accountability

One of my greatest concerns is how some SSA representatives treat beneficiaries, CPWICs, Employment Network staff, and others attempting to assist.

In one recent situation, my client reported that an SSA representative accused me of lying to them more than 20 times during their interaction. My client was left feeling they had no meaningful voice or input regarding their own benefits.

After 20 years in this profession, I find this deeply troubling.

There is a significant difference between correcting a misunderstanding of policy and repeatedly accusing a qualified professional of providing false information. Such conduct undermines trust, creates confusion, and discourages beneficiaries from seeking assistance.

Policy disagreements should be resolved respectfully, with explanations supported by SSA regulations or POMS guidance, not personal accusations.

Beneficiaries should never feel intimidated, dismissed, or powerless when discussing their own benefits.

Education Is Essential

SSA's work incentive programs are complicated. Beneficiaries need to understand how the Trial Work Period, Extended Period of Eligibility, Substantial Gainful Activity, IRWEs, subsidies, and other provisions affect their benefits.

While CPWICs provide valuable education, SSA representatives should also explain reporting requirements, available work incentives, and potential consequences of employment. Education should be part of the process, not an afterthought.

Unequal Deadlines and Processing Delays

Depending on the notice, beneficiaries may have as little as 15 days to respond and generally 60 days to appeal. Yet local offices have advised clients that processing their submissions could take up to 253 days.

How is this a reasonable or balanced system?

Beneficiaries face strict deadlines while waiting months for SSA decisions. During these delays, incorrect payments may continue, overpayments may accumulate, and financial uncertainty increases.

If beneficiaries are held accountable for timely reporting, SSA should be held accountable for timely processing.

Overpayments and Credit Reporting

I am also concerned about disputed or incorrect overpayments being reported to credit bureaus while beneficiaries are actively pursuing appeals.

An overpayment notice does not automatically mean the determination is correct. Beneficiaries have the right to challenge these decisions without facing unnecessary damage to their credit.

SSA should ensure that applicable protections against credit reporting during pending appeals are consistently followed and that inaccurate credit information is promptly corrected.

Recommendations for Improvement

I respectfully ask SSA to:

1. Simplify reporting procedures and provide consistent instructions across local offices.

2. Provide written confirmation when earnings and other documentation are received.
3. Improve representative training in work incentives, reporting rules, and respectful communication.
4. Establish clear procedures for resolving disagreements between SSA employees and qualified benefits professionals.
5. Improve beneficiary education about employment and its impact on benefits.
6. Establish reasonable processing timelines and accountability for delays.
7. Protect beneficiaries from inappropriate credit reporting while overpayments are under appeal.
8. Include repeated calls, documentation requests, corrections, and follow-ups when evaluating reporting burdens.
9. Give beneficiaries meaningful opportunities to participate in decisions affecting their benefits.

Closing Statement

I recognize that SSA employees face significant workloads. However, these challenges should never justify disrespectful treatment, inconsistent information, or unnecessary barriers to reporting.

The Ticket to Work program is intended to encourage employment and financial independence. Complicated reporting procedures, delayed decisions, and poor communication undermine those goals.

Beneficiaries are not simply case numbers. They are individuals trying to work, protect their benefits, and make informed decisions about their futures.

Beneficiaries are expected to be accountable for reporting. SSA should be equally accountable for receiving, processing, and responding to that information accurately and timely.

After 20 years in this field, I believe meaningful improvements are overdue.

Reporting should be easy for everyone. Every beneficiary deserves to be heard, respected, educated, and treated as an active participant in decisions affecting their benefits.

Thank you for considering my comments.