Public Comment on the Ticket to Work and Self-Sufficiency Program Information Collection
Docket No. SSA-2026-1090 | OMB No. 0960-0644
Submitted by: Full Circle Employment Solutions LLC

Full Circle Employment Solutions appreciates the opportunity to comment on the Social Security Administration's (SSA) information collection requirements for the Ticket to Work and Self-Sufficiency Program. We also support the comments of the National Employment Network Association.

As an Employment Network (EN), we work directly with 1000's of beneficiaries to support employment, navigate work incentives, understand the impact of earnings on benefits, and pursue greater financial independence. We believe the Ticket to Work program could be made more effective and efficient by recognizing ENs as trusted partners, modernizing information-sharing processes, and reducing unnecessary administrative burden.

1. Accuracy of SSA's Estimated Burden and Meaningful Input from Employment Networks

We are concerned about whether SSA's estimated burden hours accurately reflect the time actually spent completing the various Ticket to Work program information collections and administrative requirements.

SSA's notice estimates 302,745 annual responses and 78,309 annual burden hours across 65,095 respondents. The notice assigns specific time estimates to individual activities, including two minutes for Ticket Assignment, 40 minutes for Requesting Payments, 120 minutes for the Annual Performance Outcome Report, and 60 minutes for Form SSA-1370. While we recognize the need to estimate burden for purposes of the Paperwork Reduction Act, we believe it is important that these estimates reflect actual experience rather than assumptions that may not fully account for the operational realities of administering and participating in the program.

The notice provides estimated response times, response frequencies, respondent counts, and wage assumptions, but does not sufficiently explain how the time-per-response estimates were established, validated, or tested against the actual experience of ENs, Vocational Rehabilitation (VR) staff, EN management and beneficiaries.

We encourage SSA to engage ENs as trusted program partners in evaluating and validating its burden estimates. ENs routinely complete many of these activities and are uniquely positioned to provide practical insight into the time required, the complexity of individual tasks, the frequency of follow-up, system limitations, duplicative processes, and administrative steps that may not be captured in the current estimates.

We recommend that SSA conduct targeted outreach or structured feedback opportunities with ENs and VRs to better understand the actual time and effort associated with each information collection. This feedback should inform future burden estimates and identify opportunities to streamline, consolidate, or eliminate unnecessary tasks.

We believe a more collaborative approach would produce more credible and representative burden estimates while identifying practical opportunities to reduce administrative burden across the program.

2. Recognize Employment Networks as Trusted, Authorized Partners

ENs are integral partners in helping beneficiaries navigate employment and the complexities of Social Security benefits. Yet ENs frequently face barriers to obtaining information necessary to effectively assist beneficiaries, often requiring beneficiaries to contact SSA themselves, obtain information, and relay it to their EN. This creates unnecessary duplication, delays, and burden.

We recommend that SSA establish a streamlined process allowing ENs to communicate directly with SSA and obtain relevant beneficiary information when appropriate authorization is in place. ENs should be able to request and receive information necessary, such as the Benefits Planning Query (BPQY), to provide employment support, address work-related questions, assist with earnings and benefit concerns, and help beneficiaries make informed decisions.

This is not a request for unrestricted access to beneficiary records. It is a request for secure, authorization-based information sharing that recognizes ENs as trusted program partners and eliminates unnecessary barriers between beneficiaries, ENs, and SSA.

3. Enable Electronic SSA-3288 Authorizations and Signatures and on-demand Benefits Planning Query

We recommend that SSA permit electronic completion, signatures, submission, and processing of SSA-3288, Consent for Release of Information, forms. Paper-based processes involving printing, signing, scanning, mailing, and follow-up create avoidable delays and administrative burden.

Beneficiaries should be able to securely authorize their EN electronically, and ENs should be able to submit authorizations, receive confirmation, and access information through a streamlined digital process, such as the GSO which was used in the past. BPQYs should be on demand once electronic releases are signed. Electronic signatures would improve accessibility, reduce processing delays, and eliminate unnecessary paperwork. On-demand BPQYs would allow ENs to guide beneficiaries timely and ultimately help reduce overpayments.

4. Leverage my Social Security Accounts and the Ticket Portal

SSA should utilize existing digital infrastructure, including my Social Security accounts, GSO and/or the Ticket to Work portal, to facilitate secure information sharing between beneficiaries, ENs, and SSA.

We recommend functionality that allows beneficiaries to designate their EN, electronically authorize information sharing, securely exchange documents, and manage or revoke authorizations. Authorized ENs should be able to submit inquiries and obtain relevant information directly through a secure portal.

Leveraging existing systems would reduce redundant requests, improve access to timely and accurate information, and decrease unnecessary contacts with SSA field offices and telephone service centers.

5. Reduce Duplicative Payment Letters and Paper Correspondence

SSA should reduce routine mailing of payment-related letters to ENs when the same payment information is already available through the Ticket to Work portal. ENs need payment information to track payment status, reconcile records, and manage program administration. When this information is accessible electronically, duplicative paper correspondence creates unnecessary administrative work, costs, and delays.

SSA should prioritize timely, accessible, and sufficiently detailed electronic payment information within the Ticket portal, rather than routinely mailing duplicative letters.

6. Reduce Administrative Burden and Improve Program Efficiency

The Ticket to Work program should prioritize employment outcomes rather than unnecessary administrative processes. ENs spend substantial time obtaining documentation, following up on requests, navigating authorization procedures, and managing redundant correspondence.

SSA should eliminate duplicative documentation when information is already available within its systems, simplify authorization and information-sharing processes, expand electronic submission and document exchange, reduce unnecessary paper mail, and establish consistent procedures for authorized EN access to beneficiary information.

These improvements would allow ENs to dedicate more resources to employment services, job retention, work incentive education, and helping beneficiaries achieve self-sufficiency, while also reducing administrative costs and burden for SSA.

Conclusion

Full Circle Employment Solutions respectfully recommends that SSA:

- Reassess the accuracy of its burden estimates using direct input and practical experience from Employment Networks and beneficiaries.
- Recognize ENs as trusted, authorized partners and facilitate direct information-sharing with SSA when beneficiary consent is in place.
- Permit electronic SSA-3288 completion, signatures, submission, and processing.
- Provide on-demand Benefits Planning Queries with proper releases.
- Utilize my Social Security accounts, GSO, and/or the Ticket portal for secure authorization, information exchange, and communication.
- Reduce routine mailed payment letters when payment information is already accessible electronically.
- Eliminate duplicative documentation and unnecessary administrative processes.

Modernizing these processes and meaningfully engaging ENs and other Ticket to Work providers in the evaluation of administrative burden would improve the beneficiary experience,

strengthen collaboration between SSA and ENs, produce more accurate burden estimates, and better align the Ticket to Work program's information collection requirements with its mission of supporting meaningful employment and greater independence.

Thank you for considering our comments.

Full Circle Employment Solutions LLC