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Social Security Administration
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Re: Agency Information Collection Activities: Proposed Request

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About Allsup Employment Services

Allsup Employment Services (AES) is a Social Security-authorized Employment Network (EN) that provides nationwide assistance to Social Security Disability Insurance (SSDI) and Supplemental Security Income (SSI) beneficiaries pursuing employment through the Ticket to Work Program. AES has served as an EN for more than 12 years, and its team of vocational professionals has more than 250 years of combined experience helping individuals pursue, obtain, maintain and advance in employment.

Overview

Allsup Employment Services founder and CEO Jim Allsup has been a leader and advocate for working Americans for decades. He was a catalyst for the creation of the Ticket to Work Program through his Congressional testimony[1] in the 1990s leading up to the 1999 legislation.[2] Building on that history, AES remains committed to increasing awareness of access to and participation of SSDI beneficiaries in the TTW Program. Social Security Administration (SSA) research indicates that approximately 60% of disability beneficiaries describe themselves as work-oriented, while 18.2% state they want to work and earn enough to leave disability benefits within the next five years.[3]

[1] Committee on Ways and Means. https://www.govinfo.gov/content/pkg/CHRG-104hhrg21578/pdf/CHRG-104hhrg21578.pdf
[2] Social Security Administration. https://yourtickettowork.ssa.gov/about/history
[3] SSA. https://www.ssa.gov/policy/docs/chartbooks/di-ssi-employment/index.html

AES supports SSA's goal of helping SSDI and SSI beneficiaries pursue employment and greater financial independence through Ticket to Work. As a nationwide EN, AES also recognizes the importance of effective program oversight, accountability and integrity.

AES appreciates the opportunity to submit comments regarding SSA's information collection activities. We support SSA's efforts to improve the quality, utility and clarity of its information collections and to identify opportunities to reduce unnecessary administrative burden. In addition, we agree that administrative requirements should be designed so that Employment Networks can contribute the greatest possible share of their resources to helping beneficiaries obtain, maintain and advance in employment. Following is an outline of specific recommendations to these ends.

A. Program Components

Section VII. The Ticket to Work and Self-Sufficiency Program – 20 CFR 411—0960-0644.

AES recommends updates and changes to these specific program components, as outlined in the full listing under Section VII of Docket SSA-2026-1090:

1. Requesting Payments: Two associated Docket items.

a. Ticket Portal | Requesting Payments—EN & VR Staff.
b. Form SSA-1391 | EN Staff.

Recommendation: Modernize the payment request process so that SSA uses earnings information that the agency already has in its records. In addition, enhance the Ticket Portal to allow supporting wage information to be submitted electronically, expand functionality of the Ticket Portal to allow for automated validation and batch processing, and improve records to provide ENs with real-time payment status and automated error reporting. The Ticket Program Agreement (TPA) currently provides that SSA may initiate a payment without an EN request when SSA has earnings information that is sufficient to justify payment. Routine transactions should be handled as efficiently as possible so that EN and SSA resources can be focused on exceptions that require additional review.

2. Form Alternate Workstation Request; EN Staff.

Recommendation: Integrate the Form Alternate Workstation Request and the process of making these requests into the Ticket Portal, so ENs can maintain employee work from home information on a real-time basis. This allows direct, immediate access to records regarding EN Staff and avoids manual processes involved with completing the form and then rekeying the information for Ticket Program management by EN Service. Allowing authorized EN staff to update this information directly in the Ticket Portal, with appropriate validation and SSA review

where warranted, would eliminate a recurring source of burden for both ENs and SSA while producing more current and accurate records.

3. Annual Performance Outcome Report; EN Management.

Recommendation: Move the Annual Performance Outcome Report into the Ticket Portal rather than requiring a separate process. This improves alignment for EN processes in support of SSA's information needs through a single source. This integration means SSA could also easily prepopulate information based on existing records and data already available in its system. As a result, ENs would only need to provide information that SSA doesn't have for the annual report of outcomes. This technology-based automation would further reduce the burden on all parties.

4. Form EN Ticket Unassignment

Recommendation 1: Provide ENs timely notification when a Ticket is unassigned at the beneficiary's request or through another authorized Ticket Program process. The EN should receive timely notification of the change, including the effective date and appropriate status information. The Ticket Portal should provide timely notification to the EN and maintain an accurate record of Ticket assignment and unassignment activity to reduce the need for separate inquiries or reconciliation. **Recommendation 2:** Preserve the beneficiary's ability to independently request unassignment of their Ticket from an EN they no longer wish to work with, including through the existing beneficiary-directed process.

5. Form SSA-1374; EN Management.

Recommendation: Allow authorized EN management to make routine staff and contact changes directly in the Ticket Portal, with appropriate SSA and Ticket Program Manager (TPM) review where needed. This reduces workloads required from repeatedly submitting the same information through separate forms and manual processes.

Concluding Recommendations

AES encourages SSA to apply its process and workload review not only toward improving individual transactions outline in this docket – but also reducing the total administrative burden through refined collaboration between the agency and ENs in the use of technology, automation and better access to information.

AES further encourages SSA to evaluate whether an information collection remains necessary before simply converting an existing manual form into an electronic form. Modernization should prioritize reuse of authoritative information already available to SSA, system-to-system data exchange, automated validation and exception-based processing. The objective should be to eliminate unnecessary transactions where possible, not merely digitize them.

Specific strategies to apply with review of processes include evaluating options for:

a. Continued expansion of the Ticket Portal as the primary information exchange component of the Ticket to Work Program involving the SSA, TPM, ENs and state Vocational Rehabilitation agencies.

b. Secure batch submissions and bulk status inquiries, automating validation processes within the system, standardized electronic data exchanges, and structured electronic error detection and notification to reduce issues that impact beneficiaries' ease of participation in the Ticket Program.

c. Adopting a "collect once, use many times" approach with data collection. Common data elements are repeatedly captured in manual form procedures. By automating forms, form fills and increasing electronic submission practices, the Ticket Portal can significantly reduce SSA workload burden to manage beneficiary participation in the Ticket Program.

d. Improve the process of authorization and validation using technology and authentication processes more effectively. Technology-based electronic verification can support speedier information submission, including prepopulating fields, eliminating duplicate data fields, and reducing the amount of supporting documentation steps through internal IT-based system controls. This means the delays that come from requiring supporting documentation and paper-based trails would only be required when necessary.

e. Improve authorized EN access to program information needed to administer assigned Tickets. Where consistent with beneficiary authorization and applicable privacy requirements, SSA should make information already maintained by the agency available through the Ticket Portal when that information is necessary for an EN to effectively support a beneficiary. This could include relevant earnings history, benefit and work-incentive status, Trial Work Period information, status of work reviews, Payroll Information Exchange participation and other information affecting employment and benefits. Improving timely access to authoritative SSA information would reduce duplicative inquiries, manual BPQY requests and reconciliation efforts while helping ENs identify and address potential overpayments earlier.

AES supports the SSA and Ticket to Work Program in its responsibility to ensure program integrity and accountability. These objectives can co-exist with improved information collection and data exchange among all parties.

As referenced in this docket, burden should be evaluated based on the end-to-end process required to complete an information collection. This includes gathering and verifying information, preparing submissions and resolving exceptions, as opposed to only the time needed to enter data into a form or the Ticket Portal. In addition, burden results when ENs lack timely access to information necessary to administer assigned Tickets and must obtain, verify or reconcile that information through other means. These additional steps can also require SSA resources. Accordingly, SSA should continue evaluating which information and data-exchange

processes can appropriately be made available through the Ticket Portal, subject to applicable authorization, privacy and security requirements.

Finally, because ENs vary widely in size, service model, technology and transaction volume, SSA should include both smaller and high-volume ENs when validating burden estimates and testing processes. A process that appears minimally burdensome in isolation can create substantial cumulative workload at scale.

Continued program improvements will yield key advantages from Congressional intent when establishing the Ticket to Work Program: increasing employment participation by former workers with disabilities, bettering the solvency of Social Security trust funds and reducing workloads handled by the SSA. Every reduction in the administrative burden for the agency and participating providers means more resources available for the central purpose of Ticket to Work: helping beneficiaries achieve meaningful and sustainable employment.

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