November 23, 2026

Office of Management and Budget
Attn: Desk Officer for SSA

Social Security Administration, OLCA
Attn: Reports Clearance Director
Mail Stop 3253 Altmeyer
6401 Security Blvd.
Baltimore, MD 21235

Re: Docket No. SSA-2026-1090–91 FR 60685 (September 24, 2026).

Dear OMB and SSA:

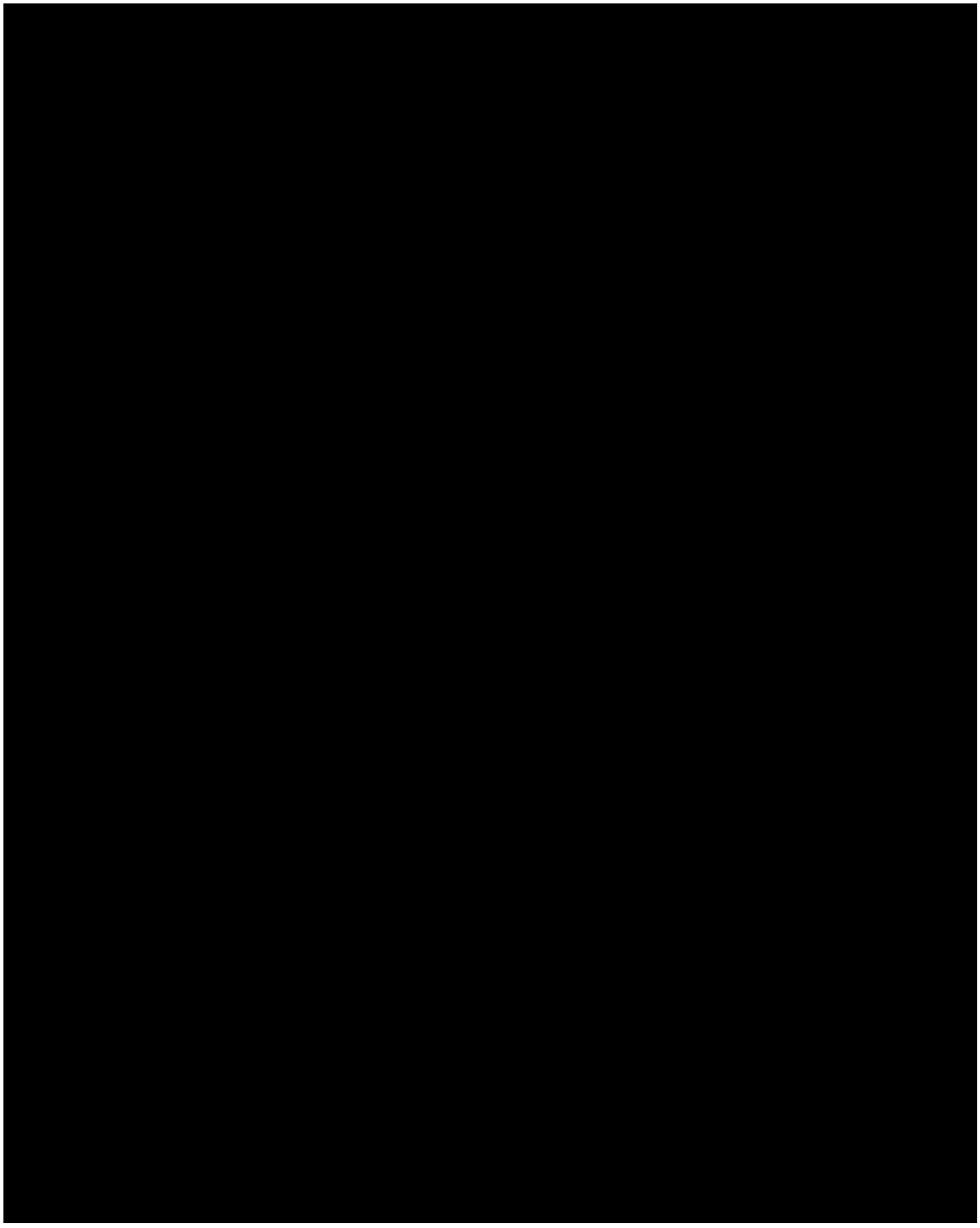
We write on behalf of our group, the National Coalition of Social Security and Supplemental Security Income Advocates, a coalition of more than five hundred advocates from nonprofit legal services organizations, as well as some aging or disability advocacy organizations nationally, with particular expertise in the work of the Social Security Administration (SSA).

We have the following concerns and questions about several of the proposed changes set forth in these Agency Information Collection Activities (Docket No. SSA-2026-1090, published at 91 FR 60685 (September 24, 2026). Numbered sections below correspond to the numbered sections as published in the Federal Register.

[redacted]

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7. The Ticket to Work and Self-Sufficiency Program.

We have the following concerns about forms used in the Ticket to Work and Self-Sufficiency Program:

- SSA-1370 Ticket to Work Program, Individual Work Plan (IWP) - The average burden of response time for this form is 60 minutes. Thoughtful and careful completion of this form is key to a beneficiary's Ticket to Work success. Given the amount of important information to be provided to the Ticket Holder and acquired by the EN for meaningful use of this form, completion could take much longer and could require more than one 60 minute session. Completion of Section 2 may require detailed information retrieval by a Ticket Holder with a work history. Section 3 requires a thoughtful discussion of unemployment goals and needed supports and services to reach those goals. Section 4 requires the EN to engage the Ticket Holder in understandable explanations of all the services and supports potentially available and to discuss how they may support short and long term employment goals. In many cases, ENS

and Ticket Holders will need much more than 60 minutes to do the work necessary for meaningful completion of this form.

- SSA-1375 Progress Review Form - The chart states that this form is not in current use and SSA is not currently conducting TPRs. This form needs revisions before it goes back into use. It's unclear whether the Ticket Holder would always be completing this form in the presence of the EN. If not, the Ticket Holder might not understand how to fill in the top box for Beneficiary and Provider. In addition, the instructions for returning the completed form and the required response time should be bolded. Also, the First 12-Month Progress Period should be pre-populated with the information of the Ticket Holder completing the form. Finally, in Part B, the Ticket Holder might not understand what is meant by "Certifying Agency" or "PID". Given the importance to the Ticket Holder of proper completion of this form, and the fact that the Ticket Holder must attest that the information is correct under penalty of perjury, the form must be crystal clear and understandable.

- SSA-1380 Beneficiary Ticket Unassignment Request Form - This form seems reasonably clear and the average response time of 10 minutes seems adequate.

Conclusion

For the reasons set forth above, we urge SSA to amend its estimates on completion time as well as alter relevant forms and procedures consistent with our comments.

Sincerely,

Amy Marinacci
Thomas Yates
Legal Council for Health Justice