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Office of Regulations and Reports Clearance
Social Security Administration
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Baltimore, MD 21235

Docket Number: SSA-2015-0025

On behalf of the CCD Employment and Training Task force and Social Security Task Force, we offer the following observations in response to the Advance Notice of Proposed Rulemaking concerning the Ticket to Work Program issued on February 10, 2016. CCD is a coalition of national disability rights, advocacy, consumer and provider organizations representing this nation's 57 million Americans with disabilities.

CCD has long supported efforts to broaden work incentives for Title II and Title XVI Social Security beneficiaries and was integrally involved in the development and passage of the Ticket to Work and Work Incentives Improvement Act. We were disappointed with the early implementation of Ticket to Work and, in general, supported the regulatory changes that were made in 2008. We note that those changes led to "rapid growth in the TTW program in terms of both providers and participants" and the last evaluation of the program confirmed "evidence that TTW participants are more likely to experience NSTW [the non-payment of cash benefits due to suspension or termination for work] than non-participants."ⁱ While recognizing the adverse impact of the 2008 recession, that evaluation further described a number of positive trends for Employment Networks and models for serving beneficiaries that should provide some encouragement for policymakers and program managers. While our observations are directed to the regulatory environment in which Ticket to Work currently operates, we want to go on record that we continue to believe there are numerous legislative changes needed to the Ticket to Work and Work Incentives Improvement Act to bring its intent and spirit to full fruition. Nonetheless, we hope that the agency finds the following comments useful as it begins to consider further changes to Ticket to Work (TTW).

1. Overall, how can we support the employment goals of social security beneficiaries through the Ticket to Work program?

The 2013 Mathematica evaluation noted increasing numbers of TTW participants using Employment Network models using Consumer Directed Services, in which ENs may share a portion of their reimbursement with a beneficiary to pay for documented services and supports purchased by the beneficiary for obtaining or retaining work. That report suggested that further exploration and expansion of consumer-directed models by SSA might be a worthwhile initiative to pursue.ⁱⁱ This CDS approach is not without problems, however, as described in a GAO Report [GAO-11-828T] which suggested SSA "adopt a strategy for compiling and using data on trends in EN service provision to determine whether service approaches, such as sharing SSA ticket payments with ticket holders, are consistent with program goals of helping ticket holders find and retain employment and reduce dependency on benefits."ⁱⁱⁱ

A 2012 report on TTW revealed that SSDI beneficiaries are “significantly more likely to participate than SSI-only recipients.”^{iv} The current Ticket to Work payment structure was built upon the SSDI work incentive platform. For example, Trial Work Level earnings allow for ENs to be paid for Phase 1 Milestones, and Substantial Gainful Activity level employment equates to Phase 2 Milestones and Outcome payments. This makes sense for this audience as these are the SSA prescribed benchmark earnings levels which also initiate the use of these work incentives.

SSI recipients are greatly disadvantaged in this payment structure, since the rules that govern the SSI program work differently. An SSI recipient has the advantage of a number of work incentives that allow SSA to reduce the amount of earnings they count when calculating an SSI recipient’s potential SSI benefit check each month. For example, SSA allows a 2 for 1 offset of earnings, meaning for every two dollars an SSI recipient earns, SSA will only “count” one dollar against their potential SSI cash benefit. This, along with other work incentives available to SSI recipients, creates a much higher earnings threshold for ENs to achieve Outcome payment status. To be precise, for 2016, for an EN to achieve Outcome payment status with an SSI recipient (single and living alone for FBR status), their earnings would have to exceed the “break-even point”, which in this example would be \$1,551. This is more than the SGA level of earnings that allow an EN to be paid for an SSDI Ticket holder who no longer receives cash benefits. Not to mention, ENs will generally spend more time serving SSI recipients due to their limited work history. In order to increase the services provided to SSI recipients, payments should be easier to achieve given the increased time ENs will likely spend serving this subset of Ticket holders.

We suggest lowering the earnings threshold that allows ENs to be paid Phase 1 Milestones, to \$500/month for both SSI and SSDI Ticket holders, with the same schedule for these payments. Next, we recommend that Phase 2 Milestones and Outcome payments remain the same for SSDI beneficiaries. For SSI recipients, we recommend an extended Phase 2 Milestone payment structure, which combines all Phase 2 Milestones and Outcome payments, which could be considered "Milestone Achievement" payments. Currently there are 18 potential Phase 2 Milestone payments available for ENs that assist SSI recipients in achieving SGA level employment, and up to 60 Outcome payments which are achieved only when the SSI recipient enters a non-payment status. SSI recipients will enter a non-payment status only after achieving their "break-even" point of earnings, which in most cases is more than the SGA earnings level. In order to equalize the payment structure for ENs that serve SSI recipients, we recommend that "Milestone Achievement" payments be paid to ENs when SSI recipients achieve SGA level earnings, whether they are in non-payment status, or still receiving a decreased SSI payment due to their work activity. This would provide for a total of up to 78 "Milestone Achievement" payments to be paid for SSI recipients that achieve the same benchmark as SSDI beneficiaries, SGA level earnings. The math for this recommendation favors the General fund, as payments to ENs will equate to about ½ of the cost savings when SSI recipients have earnings at, or above the SGA earnings level.

The earnings offset currently in SSI will now be joined by an earnings offset demonstration in SSDI under Sec. 823 of the Bipartisan Budget Act. Given our concerns about the impact of the SSI offset on participation in TTW, we urge SSA to ensure that this SSDI demonstration is tightly linked to Work Incentives Planning Assistance counseling and to monitor any impact the demonstration may have on participation of SSDI beneficiaries in the Ticket to Work Program.

2. How could we structure and present information to increase participation in and effectiveness of the program?

In addition to the changes made in 2008 to the Ticket regulations, SSA undertook a marketing campaign that resulted in increased participation among younger beneficiaries and those with psychiatric disabilities.^v There is little information provided at the school level about TTW, which may be a manifestation of current rules in which Tickets are issued to individuals at age 18 and above. However, that should not preclude SSA from working with the Department of Education on ways to introduce the Ticket program to young people with disabilities and their families.

While continuing targeted outreach efforts to particular cohorts of the beneficiary population, the agency should also consider targeted outreach to potential ENs such as employers. In 2010, only four of the top 100 ENs were employers. Yet, according to a review of EN business models published in 2013, TTW participants in employer ENs “remained in NSTW [the non-payment of cash benefits due to suspension or termination for work] longer than participants in other business models, on average.”^{vi}

SSA’s field office employees and 1-800 number employees need continuing training so that they are sufficiently well-versed in the Ticket program and all of SSA’s work incentives. While recognizing that Work Incentives Planners (WIPAs) have been specifically tasked with guiding beneficiaries through the details of SSA work incentives programs, we also note that WIPAs have been underfunded for years and their resources are stretched thin. Front line SSA workers should at least be able to identify work incentives to beneficiaries who contact them and be able to refer them to additional informational resources such as WIPAs.

SSA could also improve beneficiary understanding of TTW by wider promotion of its website www.chooseworkttw.net and other online tools designed to inform about the program. There appears to be a wealth of information for consumers on that website about TTW rules, including many of the protections afforded by the program such as expedited reinstatement, suspension of medical reviews, and continued health care coverage. Moreover, there are extensive guides advising beneficiaries about choosing the right EN and what questions they should ask when considering TTW. Yet, awareness of these resources is not widespread among program beneficiaries.

At the same time, SSA must remember that most Social Security disability beneficiaries are poor and unlikely to have ready access to the internet. SSA should broaden its non-technologically based approaches to publicizing TTW through outreach to America’s Job Centers, state workforce programs, and programs under the jurisdiction of its federal partners, such as the Department of Labor and Rehabilitative Services Administration. SSA should be promoting TTW to federal contractors and subcontractors whose obligations to recruit and hire people with disabilities under Section 503 make them obvious sources of employment for Ticket holders. SSA should also be creating stronger ties with its federal agency partners’ Equal Employment Opportunity managers as they strive to meet their own obligations under Section 501.

We note that the Workforce Innovation and Opportunity Act (WIOA) contained a number of provisions relating to employment services for beneficiaries of Social Security disability programs. While Social Security disability beneficiaries are explicitly presumed eligible for state vocational rehabilitation services under that law, WIOA also contained directions to states that they are to put in place mechanisms for referral of individuals to SSA for information concerning the ability of individuals with disabilities to work while receiving benefits. In addition, WIOA specifies that priority for individualized career services and training services funded with Title I adult funds must be given to recipients of Supplemental Security Income, among other recipients of public assistance. WIOA also allowed states to include SSA and its Ticket to Work Program as a partner in its one-stop workforce system. Unfortunately, because it is not required that Ticket to Work be a partner in a state’s workforce system, it is possible that a state’s workforce plan may overlook Ticket as a tool to expand employment opportunities for people with disabilities. We reiterate that it is vital that SSA take proactive steps to work with states and the Department of Labor to ensure that WIOA programs are fully aware of and ready to take advantage of the opportunities Ticket holders represent to fulfill their obligations under the law.

3. What employment support models are likely to be most effective in achieving the intent and goals of the program?

We strongly support the philosophy of Employment First which is described by the U.S. Department of Labor’s Office of Disability Employment Policy as a framework for systems change under which “publicly-financed systems align their policies, service delivery practices and reimbursement structures to commit to integrated employment as the priority option with respect to the use of publicly-financed day and employment services for youth and adults with significant disabilities.” ODEP offers an array of resources to guide public service delivery programs in effecting Employment First at <http://www.dol.gov/odep/topics/employmentfirst.htm>.

Many states have adopted Supported Employment or Customized Employment as a means for promoting integrated employment opportunities for people with disabilities. We assume that many ENs already use these approaches in their service models. SSA may want to examine where these practices are in effect among ENs and their success rates in helping beneficiaries achieve economic self-sufficiency.

4. What incentives could we offer to help ensure ENs are financially and organizationally viable?

At least annually, ENs must report outcome data which is combined with beneficiary satisfaction survey results in an Annual Performance and Outcome Report (APOR). SSA could consider offering bonus payments based on the APOR.

Under the Milestone-Outcome payment system, EN's are paid once a beneficiary earns at least the trial work level [TWL (\$810 a month)] for one calendar month. There is one exception to the earnings requirement that allows payment of the first milestone, if a beneficiary's earnings are between 50 percent of TWL and the SGA amount, if the beneficiary achieves TWL earnings within the next two months. This is obviously a complicated provision and one with which few ENs are familiar. Currently, for beneficiaries who work for an extended period of time between 50 percent of TWL and SGA, payments to the EN are not available, despite all the supports and efforts made on behalf of the beneficiary. As noted in question 1, SSA may wish to consider revising its payment structure to afford some opportunity for ENs to receive payment when someone reaches a level of monthly earnings, such as \$500, that is less than TWL.

EN's that specialize in serving those with longer periods of unemployment or detachment from the workforce are offered the same payments as those EN's that assist those with fewer barriers. Enhanced payments – or paying milestone payments for a longer period of time – might benefit those ENs for which it takes longer and more intensive services to return a beneficiary to competitive steady employment. At the same time, we recognize that this approach risks accommodating ENs that are currently failing to adequately serve people with the most significant barriers. We would encourage SSA to assess the concerns of ENs whose dominant client base represents the hardest to serve and consider changes that both ensure adequate payment and hold ENs accountable for ensuring that they serve people with all levels of support need and barriers to work.

Finally, CCD continues to support a policy in which ENs are able to choose Milestone/Outcome or Outcome payments on a client by client basis. This would be another means of helping ENs by enabling providers to select the payment protocol best suited to the services a client might need.

5. What incentives could we offer ENs for collaborating effectively with employers, VR agencies, public work force systems, WIPAs and other entities assisting our disability beneficiaries?

The September 2012 TTW evaluation reported that Partnership Plus cases “make up a tiny proportion of all Ticket assignments” and that, beyond encouraging existing contractors to become ENs, there has been “less ‘partnership’ between State Agencies for Vocational Rehabilitation [SVRA] and ENs” than may have been expected.^{vii} Numerous ENs from across the country report little cooperation and outreach from their state vocational rehabilitation agency in sharing clients and information about prospective employers. Florida and Virginia are among the few states with positive working relationships with ENs and SSA may wish to explore the reasons for those outcomes to see if there are best practices that could be replicated elsewhere.

A particular frustration for many ENs with their SVRA is the EN's lack of information about clients whose cases have been closed by the state agency but who may nevertheless benefit from an EN's services. If SVRAs were to place their closed cases on SSA's secure portal to which ENs currently have access, ENs would gain information about the availability of prospective clients and, if able to follow up within the 90 day timeframe, could possibly engage with the Ticket holder to keep his or her timely progress status in play.

It would be helpful for current and prospective ENs to learn from the experiences of other ENs and employers about hiring and working with people with disabilities. While the website for beneficiaries features numerous profiles of people with disabilities who have successfully entered the workforce, there does not appear to be

similar information under the website for ENs – yourtickettowork.com. Posting interviews on that website with a diverse range of employers and ENs would be a way to recognize successful partners in a way that might draw others to the program.

6. How could the program encourage youth with disabilities to pursue apprenticeships, career development programs, post-secondary education, and other work-related opportunities in a manner similar to their peers without disabilities?

We are puzzled by this question given that these responsibilities fall under the jurisdiction of other federal agencies and, given SSA's limited resources, do not believe that the agency should undertake these additional obligations. As noted elsewhere, it may be best for SSA to work proactively with its federal partners at Labor and Education to ensure that the Ticket program is fully integrated into the broader workforce development system. We are also concerned that attempts to encourage work prior to age 16 could put at risk necessary supports and services for certain young people when they face a redetermination at age 18. At the same time, we recognize that SSA has its PROMISE demonstration program and suggest the agency connect ENs to those grantees in order to test some of the concepts contained in this question.

7. How could ENs become integral to transition planning with youth who have disabilities, their families, and local schools?

We understand the importance of providing young people with tools they will need to advance economically once they exit school. However, we are hesitant to support inclusion of ENs or other SSA entities in the transition planning process when it is difficult enough to obtain the involvement of relevant state agencies in transition. We do, however, support providing information about Employment Networks and the Ticket to Work program, including Work Incentives Planners and Protection and Advocacy counseling, in the transition planning process as early as possible while the student is attending school.

8. Would offering beneficiaries financial education and planning services be appropriate for the program? If so, how could we accomplish this through changes to the program regulations?

WIPAs are already functioning as benefits counselors for TTW and could add these services to their menu of assistance offered. It is likely, however, that they might require additional resources to provide these services. Alternatively, SSA could explore what financial literacy programs are offered through the Consumer Financial Protection Bureau and partner with that agency to incorporate financial education into TTW. Beyond these steps, SSA should partner with HHS in developing waivers for Individual Development Accounts that allow individuals with disabilities, particularly those in the SSI program, to build assets that lead to financial independence.

9. What service barriers or administrative complexities do ENs face that inhibit their ability to serve our beneficiaries?

Administrative complexities that are not directly related to the Ticket program can nonetheless have an impact on its functioning. A particular case in point involves overpayments applied to beneficiaries. A beneficiary may be assisted for years by an EN – involving lengthy support services and considerable time and effort on the part of EN staff. If the Ticket holder is subjected to an overpayment penalty by SSA, this can create an adverse relationship between EN and beneficiary. Many years ago, SSA created the E-Works system by which the agency tracked beneficiary wages. When the Social Security Protection Act passed, it required SSA to use E-Works to generate receipts for purposes of wage reporting. Unfortunately, these receipts still required hand processing by claims representatives who have not always done this in a timely fashion. In the Bipartisan Budget Act passed in late 2015, provisions were included requiring SSA to permit DI beneficiaries to report their earnings via electronic means, including telephone and internet, similar to what is available to Supplemental Security Income recipients. If implemented properly and expeditiously, this provision could not only prevent large overpayment penalties against beneficiaries, it could alleviate one of the ongoing

frustrations encountered by ENs in determining if a beneficiary is still working since they are no longer required to report their continued employment to ENs.

SSA and the IRS currently have a record matching agreement to determine if a beneficiary is receiving income. Beneficiaries sometimes leave their job but continue to receive non-work income – such as investment income or waiver of debts - that IRS then reports to SSA. Interpreting this to income to be earnings, SSA keeps paying the EN, which results in an overpayment to the provider. When SSA discovers this error, SSA will seek to recoup those overpayments, often many months after the payments have been made, causing some hardship to the employment network. Instead of the current quarterly income matching, SSA should do a match more often to catch circumstances such as this at an earlier point.

A different approach might be available through provisions enacted in the 2015 Bipartisan Budget Act. Sec. 824 of that law authorizes Social Security to obtain, with beneficiary consent, data on beneficiary earnings from payroll providers and other commercial sources of earnings data through a data exchange. Individuals for whom SSA obtains earnings data from these sources are then to be exempt from the requirement to report their own earnings. SSA should explore ways to use this data to help track and determine employment status of TTW participants in order to prevent significant overpayments to the EN. However, the effectiveness of this policy depends upon on the quality of the payroll data that SSA is able to access as well as SSA's efficiency in entering data from a payroll processor to determine the impact on a beneficiary's benefits and on payments to an EN.

10. How might we encourage more organizations that can provide appropriate services to our beneficiaries to participate as ENs?

SSA's current rules require ENs to have at least two years' experience providing services to individuals with disabilities. This requirement alone likely excludes many organizations with the potential for assisting beneficiaries to enter or re-enter the workforce.

Moreover, the instructions for the application process to become an EN are 91 pages <http://www.ssa.gov/work/documents/New%20table%20EN%20RFQ-12-0010L%208-27-12.doc> and require two separate contract agreements at two separate websites with a very unclear process to follow and no persons with whom to talk through any questions that may arise. This process is onerous at best, and poses a significant disincentive for qualified organizations to participate in the EN process.

Simply put, the process for becoming an EN is too complex for many small vocational providers, let alone businesses that might serve beneficiaries as an EN. Because of the administrative burden that exists in the current program, an Administrative EN model has arisen in TTW that helps service providers with the various paperwork, reporting, security and other requirements they must fulfill in order to be an EN. However, this resource is not widely known among service providers. SSA could at least promote greater outreach by Administrative ENs to alert small providers to the availability of their services as an enticement to recruit more ENs. Because the Consumer Directed service model might appeal to smaller service providers, SSA should publicize this option to prospective EN providers as well. SSA may also want to convene a series of stakeholder meetings to ascertain what may be keeping certain entities - such as employers or small service providers - from becoming an EN and how the agency could streamline the application process to make it more appealing to a broader range of providers.

11. Should we adjust our payment systems to increase EN payments when a beneficiary earns more than the SGA level for sustained periods? If so, what adjustments could we make without increasing overall program costs?

We agree that adjusting SSA payment protocols to increase EN payments when a beneficiary earns more than the SGA level for sustained periods would be an incentive for an EN to remain active with and offer supports for the beneficiary. We doubt that this could be achieved without increasing the overall program costs.

Perhaps some of the later Phase 2 milestones could be moved to the Outcome payment period to extend that for DI beneficiaries beyond 36 months. SSA could also possibly increase the Outcome payments for SSI recipients in the latter stages of the 60 month period.

Based on SSA's current policy regarding recent work activity of a Ticket holder, an EN may not be eligible for certain Phase 1 Milestone payments if there was recent work within the last 18 months. This policy seems to imply that the work of an EN is easier, or shouldn't be reimbursed, if the Ticket holder has worked in this previous period. This couldn't be farther from the truth, as every Ticket holder served has unique needs that must be addressed by an EN, whether they have worked recently or not. This "18 Month Look-Back" rule also discourages ENs from working with individuals who may not have Phase 1 Milestone payments available due to their recent work activity. We recommend that this policy be eliminated. In cases where a Ticket holder is already working when assigned, often the next step of an Employment Network is to assist the Ticket holder in achieving greater earnings levels, which will lead to SGA level earnings, and eventual elimination of benefits. This takes time for an EN, and these activities should be compensated by allowing the Phase 1 Milestones to remain available, regardless of recent work activity.

12. Should we adjust our payment systems to provide even more EN payments than we currently do for helping a beneficiary secure and maintain part-time employment below the SGA level? If so, how might such a payment differ from the EN payments for a beneficiary earning at or above the SGA level?

We acknowledge that one of the goals of the Ticket to Work and Work Incentives Improvement Act is "to establish a return to work ticket program that will allow individuals with disabilities to seek the services necessary to obtain and retain employment and reduce their dependency on cash benefit programs."^{viii} However, providing EN's with payment for helping a hard-to-place beneficiary find work for an extended period, even when it is part time work below TWL, would reward those providers that expend considerable time and resources on such clients. The current exception to the earnings above TWL rule does provide for payment if a beneficiary is earning between 50 percent of TWL and SGA but that beneficiary must achieve TWL within two months. As noted previously, this is a confusing standard and one that many ENs don't know about. If SSA were to devise a simpler payment standard for part time work – perhaps based on a percentage of the traditional Milestone payment – that might assist ENs with a client base with greater barriers to employment and it could encourage greater Ticket use among populations for whom part-time work is more feasible. See our more extensive comments under Question 1.

13. The blanket purchase agreement we award to contractors to serve as ENs outlines their requirements to provide ongoing support services to beneficiaries. How should we define "ongoing support services" for the ENs? What ongoing services are necessary to support beneficiaries in jobs above SGA levels for sustained periods?

Ongoing support services are very individualized to the beneficiary and any definition should allow a degree of flexibility. It might be possible to identify these services for, at most, 6 months. However, beyond that timeframe, it is hard to predict what services a client may need. These services are often included in the Individual Work Plan or IWP but work plans are often modified. For some beneficiaries, follow along services may require nothing more than an annual "check in" with the EN. For other clients, ongoing support services can include health care coordination, coaching, financial literacy education, accommodation referral, therapy, counseling, and substance abuse treatment but this list is by no means exhaustive.

14. Under the program, State VR agencies participate either as ENs or under the cost reimbursement payment system (20 CFR 411.355) applicable to them. Should State VR agencies participating as ENs offer the same services and have the same responsibilities as other ENs? If not, what services and supports should State VR agencies participating as ENs provide?

Although a number of our organizations have concerns about the role of SVRAs in TTW, we chose not to address this particular question.

15. In measuring EN performance, we consider factors such as:

- Completing employment support services as planned;
- the percentage of Ticket to Work clients who were placed in a job within 9-12 months;
- the percentage of clients who retained their jobs for significant periods; and
- the percentage of clients who progressed to long-term earnings above SGA.

Are these appropriate measures and, if not, what measures should we use?

In general, these are good measures for evaluating EN performance, although there may be merit in considering additional measures depending on an EN client base. Some ENs may have as their major target population those with catastrophic disabilities, who may have age-related health complications, may not have been in the workforce for 10 or more years, and have weak or no residual transferable skills. Under those circumstances, having different measures to show “success” or progress may make sense. A client with paralysis and traumatic brain injury who has not worked in 15 years and needs help identifying job objectives may require more intensive services than someone with a different set of health conditions who has residual work skills and a more recent work history. Both such clients would be evaluated under the same time markers currently where the former beneficiary might take longer to return to competitive employment. SSA may wish to consider adjusting its time markers for such clients from 9 to 12 months to 18 to 24 months. Beyond this, SSA could use the beneficiary satisfaction data collected by the Program Manager to amplify its EN performance measures.

16. What are some barriers that ENs face? How might we adjust our rules to help ENs succeed at providing the services and support beneficiaries need to find and maintain employment?

Based on SSA’s current policy regarding recent work activity of a Ticket holder, an EN may not be eligible for certain Phase 1 Milestone payments if there was recent work within the last 18 months. This policy seems to imply that the work of an EN is easier, or shouldn’t be reimbursed, if the Ticket holder has worked in this previous period. This couldn’t be farther from the truth, as every Ticket holder served has unique needs that must be addressed by an EN, whether they have worked recently or not. This “18 Month Look-Back” rule also discourages ENs from working with individuals who may not have Phase 1 Milestone payments available due to their recent work activity. We recommend that this policy be eliminated. In cases where a Ticket holder is already working when assigned, often the next step of an Employment Network is to assist the Ticket holder in achieving greater earnings levels, which will lead to SGA level earnings, and eventual elimination of benefits. This takes time for an EN, and these activities should be compensated by allowing the Phase 1 Milestones to remain available, regardless of recent work activity.

SSA should consider adopting an EN satisfaction survey with which to evaluate the performance of its Program Manager. Too often, ENs receive conflicting answers to questions posed to the Program Manager or they receive no response at all to inquiries they make to the Program Manager concerning their operation of the Ticket Program. Failure of the Program Manager to assist many ENs in a timely and accurate fashion is an ongoing source of frustration and barrier faced by providers.

Finally, there is a need for better SSA field office training on work incentives. CCD organizations report that many agency field office staff continue to advise beneficiaries not to work more than part-time and seem unfamiliar with basic work incentives to inform beneficiaries of these options. EN providers also report difficulties in obtaining BPQY reports from field offices which hampers their ability to obtain information about a beneficiary’s use of work incentives. This in turn makes it difficult for the ENs determine how best to serve the beneficiary given his or her status under trial work or extended period of eligibility or any of the other factors that may affect the beneficiary’s participation in TTW.

Thank you for this opportunity to share CCD’s views on the Ticket to Work Program. We look forward to making further comments on a formal Notice of Proposed Rulemaking.

For the Employment and Training Task Force

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ⁱ Mathematica Policy Research, Schimmel et al, Participant and Provider Outcomes Since the Inception of the Ticket to Work and the Effects of the 2008 Regulatory Changes, Final Report, July 25, 2013, p.67

ⁱⁱ Ibid, p. 70

ⁱⁱⁱ GAO-11-828T, Social Security Disability: Participation in the Ticket to Work Program has Increased, but More Oversight Needed, Testimony Before the Subcommittees on Social Security and Human Resources, Committee on Ways and Means, house of Representatives, September 23, 2011, p. 10

^{iv} Mathematica Policy Research, Livermore et al, Ticket to Work Participant Characteristics and Outcomes under the Revised Regulations, Final Report, September 24, 2012, p.25

^v Mathematica Policy Research, Livermore et al, Ticket to Work Participant Characteristics and Outcomes under the Revised Regulations, Final Report, September 24, 2012, p. 45

^{vi} Mathematica Policy Research, J. Schimmel, New Evidence on the Role of Provider Business Model in the Economic Viability of Employment Networks Under Ticket to Work, July 2013, p. 2

^{vii} Mathematica, September 24, 2012, op. cit., p. 37

^{viii} Ticket to Work and Work Incentives Improvement Act [TWWIA] Sec. (2)(b)