



November 13, 2020

U.S. Department of Labor  
Office of Disability Employment Policy  
Attn: Jennifer Sheehy, Deputy Assistant Secretary  
S-1303  
200 Constitution Ave NW  
Washington, DC 20210

**Re: Request for Information on Proposed Transfer of Ticket to Work Self-Sufficiency Program from the Social Security Administration to the Department of Labor; 85 FR 61032, Agency Docket Number DOL–2020–0006, RIN 1230–ZA00, Document Number 2020-21533**

Founded in 1988, APSE is the only national organization devoted to Employment First. We've worked for five decades on policy, advocacy, sharing best practices and connections to advance competitive integrated employment for all. Meaningful employment, fair wages, and career advancement for people with disabilities is an essential social determinant of health.

Thanks to the dedicated and relentless advocacy of individuals with disabilities, their families, and concerned organizations, Americans with disabilities have seen profound and positive improvements in their lives and livelihoods. Financial independence has been achieved through the use of the Ticket to Work and Self –Sufficiency Program (TTW) for a small subset of individuals with disabilities.

However, as a well-intentioned program to expand medical insurance coverage and support career development for beneficiaries, TTW has proven to be ineffective with achieving its desired outcomes as a result of its complex design, inefficient administration and inconsistent programmatic oversight. Our comments regarding potential benefits and challenges with the integration of TTW within the public workforce system are as follows:

**Benefits:**

- Further integration of people with disabilities into the workforce development system with the potential to optimize the use of programs and services delivered by the American Job Centers and Workforce Innovation and Opportunity Act partners

- Opportunity for improved and renewed messaging on the use of TTW to support the development of career pathways for individuals with disabilities
- A redesign of the program contractor/administrator with an opportunity to streamline Employment Network contracting, expand customer outreach, renew messaging and expand Employment Network options
- An avenue for potentially expanding partnership plus and implementation of a reimbursement model which incentivizes quality employment outcomes
- Increased access to local and statewide relationships with state vocational rehabilitation (VR) agencies, Workforce System entities and the local business community.

**Concerns & considerations:**

- TTW's integration with the Center for Medicare & Medicaid Services (CMS) is expansive. DOL has limited experience with programmatic design with CMS which could result in further programmatic and administration inefficiencies.
- Prior to any transfer of administration, the TTW program and current work incentives should be revised for simplification and effective design. The transfer of administration without simplification leads to further inconsistent messaging to Social Security Disability Insurance (SSDI) and Supplemental Security Income (SSI) recipients
- Assurances are essential with preserving the intent of TTW being voluntary and affording ongoing support of flexibility in choice of service providers from SSDI and SSI beneficiaries.
- It is important to maintain existing Work Incentives Planning and Assistance (WIPA) programs and technical assistance centers available with Certified Work Incentive Counselors. There is a continued shortage of resources and technical assistance which would not have the capacity to re-build existing supports in a manner which would meet the needs of individuals
- Many existing Employment Networks (EN) have effective and well-established relationships with individuals with disabilities. An assurance on the continued use of existing ENs as part of the workforce development system is essential with maintaining continuity of service.
- Existing federal funds allocated for the implementation of TTW and reimbursement of ENs for outcome payments should be preserved as a specific targeted budget item without dilution.



APSE stands ready to serve as a resource and offers its support to the Department of Labor (DOL) and Social Security Administration with any efforts having a strategic focus on the efficient and effective implementation of TTW. As APSE and DOL have a history of collaboration and innovation, we would welcome participation in an advisory capacity.

Thank you for the opportunity to offer comment on what could be a promising and simplified pathway in expanding employment opportunities for individuals with disabilities.

Sincerely,

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Cc:  
Duane Shumate and David Hoff, APSE Public Policy Committee Co-Chairs