

TRAINING AND EMPLOYMENT NOTICE	NO. 16-18
	DATE March 8, 2019

TO: STATE WORKFORCE AGENCIES
STATE WORKFORCE ADMINISTRATORS
STATE WORKFORCE LIAISONS
STATE AND LOCAL WORKFORCE BOARD DIRECTORS
STATE AND LOCAL WORKFORCE BOARD CHAIRS
AMERICAN JOB CENTER MANAGERS

FROM: MOLLY E. CONWAY /s/
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Employment and Training Administration

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Deputy Assistant Secretary
Office of Disability Employment Policy

SUBJECT: New Administrative Processes for Public Workforce Employment Networks under the Social Security Administration's Ticket to Work Program

1. **Purpose.** To support the Department of Labor's (DOL) goal to expand the capacity of the American Job Center (AJC) network to serve persons receiving Social Security disability benefits, this Training and Employment Notice (TEN) notifies the workforce system about the Social Security Administration's (SSA) Ticket to Work program's new administrative processes for public workforce employment networks (EN). This TEN replaces TEN No. 02-14, *Receiving Ticket to Work Payments as an Employment Network*.
2. **Action Requested.** Recipients of this guidance are encouraged to gain familiarity with the resources and disseminate this TEN to appropriate managers and staff in State Workforce Agencies (SWA), State Workforce Development Boards (SWDB), Local Workforce Development Boards (LWDB), AJCs, and other public workforce system partners.
3. **Summary and Background.**
 - a. Summary – Under SSA's Ticket to Work regulations, SWAs, SWDBs, LWDBs, and AJCs are all deemed automatically qualified as an EN.
 - b. Background – The Ticket to Work program is the centerpiece of the Ticket to Work and Work Incentives Improvement Act of 1999, Public Law 106-170. Under this program, Supplemental Security Income (SSI) or Social Security Disability Insurance (SSDI) beneficiaries, ages 18 through 64, also called Ticket Holders, may reduce their dependency on public benefits and become more economically self-sufficient.

Ticket Holders may receive Ticket to Work program services, such as education, training, benefits counseling, and employment placement, from the State Vocational Rehabilitation (VR) agency or an EN. An EN is a for-profit or non-profit entity approved by the SSA to serve individuals under the Ticket to Work program by accepting Tickets and receiving payment from the SSA for providing services to Ticket Holders. In Fiscal Year 2018, AJCs serving as ENs received a total of \$6.1 million in payments for services from the SSA.

4. Administration Guidance.

a. Request for Application.

SWAs, SWDBs, LWDBs, and AJCs that wish to become an EN should submit a Request for Application (RFA) to the SSA. The RFA explains the duties of an EN, requirements for award consideration, and directions for submitting the RFA. Moreover, unlike traditional organizations submitting their RFA, the public workforce agencies and workforce development boards are not required to submit a business plan. Elimination of this business plan element, along with the additional support provided by SSA's EN Services, helps to expedite and simplify this process. Once the SSA approves the RFA, EN staff need to complete new EN training and obtain suitability clearance then a Ticket Program Agreement is placed on record, and the SSA-approved workforce entity can begin operating as an EN. Note: To receive services from an EN, the Ticket Holders must first assign their Ticket to the EN of their choice. Additional information about the RFA can be found at: <https://www.ssa.gov/work/enrfa.html>.

b. Options for Public Workforce System Participation.

There are three ways SWAs, SWDBs, LWDBs, and AJCs can participate in the Ticket to Work program. This flexibility allows the workforce entity to select an option that works best for their organization.

Option 1: An SWA, SWDB, LWDB, or an AJC can apply to the SSA to be a single stand-alone EN. This model requires the workforce entity to designate staff to handle all the paperwork and interaction with the SSA and the Ticket Program Manager (TPM) including:

- Identifying and assigning Ticket Holders;
- Creating an Individual Employment Plan (IEP) for each assigned Ticket Holder;
- Requesting and receiving Ticket payments; and
- Complying with all SSA Ticket to Work program's administrative and reporting requirements.

Option 2: An SWA or SWDB can apply to become an Administrative EN (AEN). As an AEN, the centralized State entity manages all interaction with the SSA and necessary administrative duties. The LWDBs, AJCs, and other workforce system

partners would provide the EN services to Ticket Holders. The AEN would handle all the paperwork and interaction with the SSA and the TPM as outlined in Option 1 above.

Additionally, an EN, serving under Option 1 or 2, can choose to focus its service provision primarily on ongoing supports for beneficiaries exiting the public VR system under the Partnership Plus model. Under the Partnership Plus model, an EN and a VR agree to transfer the beneficiary following VR services to the EN for ongoing employment supports, including job placement, retention, and other services. In return, both the EN and VR receive payment for services provided to the beneficiary.

Option 3: An SWA, SWDB, LWDB, or an AJC can contract with an existing AEN to manage the administrative responsibilities of the Ticket to Work program, while the workforce entity focuses on service delivery. Under this option, the public workforce entity does not need to have dedicated staff resources to manage Ticket Program business duties but is still eligible for payments for services provided to the SSA Ticket Holders. The AEN handles all technical Ticket business issues and may provide additional ongoing support services that the workforce entity does not provide such as benefits counseling.

c. Payments.

Approved ENs can choose between two payment systems—the Milestone/Outcome system or Outcome-only system. Milestone/Outcome payments offer ENs payments based on Ticket Holder earnings thresholds over certain timeframe benchmarks. For example, the first Milestone/Outcome payment begins when the Ticket Holder achieves earnings at the “Trial Work Level” (at least \$850 in 2018) in one month.

ENs may choose to receive “outcome-only” payments for more targeted outcomes when a beneficiary has earnings above substantial gainful activity (SGA), and their disability benefits cease due to earnings. In 2018, ENs received up to \$28,332 in payments for providing employment services to an SSA beneficiary under either the Milestone/Outcome payment plan or the Outcome-only payment plan. Information about monthly SGA amounts by disability type is available here: <https://www.ssa.gov/OACT/COLA/sga.html>. Additional information about payments can be found at: <https://yourtickettowork.ssa.gov/employment-networks/payments.html>.

d. Additional Resources.

Ticket to Work Resources

- Ticket to Work public program website: <https://choosework.ssa.gov/>
- Service provider website: <https://yourtickettowork.ssa.gov/>
- SSA’s Publication on ENs: <https://www.ssa.gov/pubs/EN-05-10065.pdf>
- Partnership Plus and State VR Agencies: <https://yourtickettowork.ssa.gov/program-operations/partnership-plus.html>
- SSA’s The Red Book - A Guide to Work Incentives: <https://www.ssa.gov/redbook/>

U.S. Department of Labor's Disability and Employment Resources

- Employment and Training Administration's Disability and Employment Online: <https://doleta.gov/disability/>
 - Office of Disability Employment Policy: <https://www.dol.gov/odep/>
 - Disability and Employment Community of Practice: <https://disability.workforcegps.org/>
 - Ticket to Work: Workforce EN Planning Guide: https://disability.workforcegps.org/resources/2015/05/06/16/08/TTW_Workforce_EN_Planning_Guide
 - Section 188 Disability Reference Guide - Achieving Universal Access and Equal Opportunity: https://disability.workforcegps.org/resources/2016/04/12/11/33/TEN_Achieving_Universal_Access_and_Equal_Opportunity_Section_188_Disability_Reference_Guide
5. **Inquiries.** For further information about Ticket to Work's ENs, please contact ENOperations@yourtickettowork.ssa.gov or the appropriate regional office.
6. **References.** Not Applicable.
7. **Attachment(s).** Not Applicable.