

Testimony Before the U.S. House Committee on Ways and Means

Submitted by: Amy Wallish, Founder & CEO, Full Circle Employment Solutions LLC

Re: Untapped talent in America: Removing Barriers to Work and Supporting Opportunity for Individuals with Disabilities

Date: September 9, 2025

Chairman Smith, Ranking Member Neal, and Members of the Committee:

Thank you for the opportunity to testify today. My name is Amy Wallish, and I am the Founder and CEO of Full Circle Employment Solutions LLC, a woman owned, national organization devoted to expanding employment opportunities for individuals with disabilities. I founded Full Circle in 2010, inspired by my personal experience living alongside individuals with disabilities. I've witnessed firsthand both the systemic barriers they face in accessing employment and the profound impact that meaningful work can have when those barriers are overcome. This lived experience continues to inform my mission and convictions: that every individual deserves the opportunity to fully participate in the workforce and make a meaningful impact on society.

I've spent more than 25 years working at the intersection of disability, employment, and policy—leading Employment Networks through the Ticket to Work program, overseeing Work Incentives Planning and Assistance (WIPA) projects, and supporting national demonstration and evaluation projects. As a Certified Benefits Counselor (Community Work Incentives Counselor - CWIC), I've worked with thousands of Social Security beneficiaries navigating the complex benefit rules surrounding employment along with supporting them through career coaching, job development and as a cheerleader while they strive to meet their life goals. As an entrepreneur and small business owner, I'm committed to reducing the administrative burdens that hinder small business operations while actively working to generate meaningful professional employment opportunities nationwide.

Since 2010, Full Circle has provided benefits and career counseling to beneficiaries across the country. Full Circle operates both Administrative and Traditional Employment Networks through the Ticket to Work (TTW) program, alongside our WIPA services. We also deliver robust, fee-for-service Vocational Rehabilitation benefits counseling programs in multiple states. Each year, we support over 1,000 beneficiaries nationwide—including youth with disabilities, individuals experiencing homelessness, veterans, and those with significant mental health or developmental disabilities. Our mission is to empower every individual we work with to discover a path to work, purpose, and independence.

At Full Circle, our core expertise lies in benefits counseling. With a team of over 20 nationally Certified Benefits Counselors, we are uniquely equipped to dispel common misconceptions about returning to work while receiving benefits. Each of our counselors

has completed rigorous national training and certification, enabling us to provide accurate, detailed guidance on how employment affects Social Security benefits such as SSDI and SSI. Our counseling also covers the intricate rules surrounding Medicaid, Medicare, housing assistance, SNAP, and other public benefits.

I'm here today because I believe in the transformative power of work. I believe in the impact of benefits counseling—how timely, accurate information can truly change lives. Through the Ticket to Work (TTW) programs, I've witnessed countless individuals rise from poverty to financial stability. Time and again, I've seen how collaboration across programs drives real, lasting change. I'm committed to continuing this work as a change agent. I believe these programs deserve ongoing support, continued funding, and a focus on increasing their efficiency to better serve those who rely on them.

Background on TTW and WIPA

The Ticket to Work and Work Incentives Improvement Act of 1999 created a path for Social Security beneficiaries with disabilities to return to work voluntarily, without immediately risking their benefits or healthcare. Core players in the system include:

- Employment Networks (ENs), who provide career counseling, job placement, and long-term support.
- Work Incentives Planning and Assistance (WIPA) projects, which are Social Security funded projects that strictly offer benefit counseling and help navigate work incentives.
- State Vocational Rehabilitation (VR) agencies typically provide short-term services at the outset before transitioning individuals to ENs through Partnership Plus programs for continued long-term support.

Joe is a strong example of how these programs work collaboratively to improve employment outcomes through the Partnership Plus model where VR and ENs work together. He was homeless and living in his car while receiving mental health support, he began working with one of our Full Circle benefits counselors through his state VR program. With their help, Joe secured full-time employment as an HVAC assistant. However, after starting work, his Medicaid was abruptly cut off, leaving him without access to healthcare or psychiatric care. Joe immediately contacted his benefits counselor, who worked with his senator's office to reinstate Medicaid under the 1619(b) provision, ensured proper wage reporting, and maintained Joe's medical coverage while reducing his SSI to \$0. With stable healthcare and income, Joe then secured housing and continued working full-time. After VR closed his case, he continued to work with Full Circle through our EN from 2018 to 2023 for ongoing employment support and benefits counseling, which helped him sustain long-term, meaningful employment.

Another example of the importance of WIPA in providing long-term benefits counseling is Tom's story. He and his 80-year-old father sought assistance from Full Circle's WIPA after his SSDI benefits were terminated and he received notice of a \$35,000

overpayment—jeopardizing his employment, housing stability, and access to transportation. Upon thorough review of his work history, his WIPA benefits counselor identified unrecorded subsidies stemming from job coaching services. Over the course of the next year, his benefits counselor supported him with the submission of multiple appeals, including a comprehensive 73-page waiver request and an 86-page Work Activity Report. Through these efforts, we proved a 50% subsidy, had the overpayment waived, and secured full back pay. Today, Tom is employed full-time and living in stable housing—outcomes made possible only through WIPA’s dedicated advocacy and expert guidance.

Together, these programs create a coordinated ecosystem that reduces barriers to employment, promotes informed decision-making, reduces recidivism to VR, and fosters sustainable employment outcomes.

Why People Seek Our Help

Many individuals worry that earning income might jeopardize their access to Social Security Disability Insurance (SSDI), Supplemental Security Income (SSI), or healthcare coverage like Medicaid and Medicare. This is why they seek out Full Circle’s help. Our benefits counselors are trained to explain how work incentives and safety nets—such as the Trial Work Period (TWP) or the Student Earned Income Exclusion (SEIE)—can allow individuals to explore employment without immediately losing their cash benefits.

People come to us mostly through referrals—from VR, mental health providers, caseworkers, or SSA itself. Some find us online or hear about our services through peer networks. What motivates people to seek out a benefits counselor is usually fear or confusion. They’re not sure what’s safe or what’s risky. They may want to work, or increase their hours, but they’re terrified they’ll make a mistake and lose everything. Benefits counseling provides clarity, and that clarity gives people the courage to try working.

And the truth is, staying on benefits is often the path of least resistance. It’s a logical, rational decision in the short term. People are trying to survive—and the system, as it’s structured now, can make work feel like a risk, not a reward. This fear holds people back. Work brings far more than just a paycheck. It improves mental health, physical health, self-worth, and social connection. It provides structure, purpose, and belonging. And for society, it means more people contributing to the economy, paying taxes, and living independently. Benefits counseling helps tip the balance—by showing people how to take calculated steps forward, using the protections built into the system.

Full Circle’s TTW staff provide personalized support that goes beyond just finding a job. We help individuals identify their strengths, build resumes, prepare for interviews, and connect with employers who understand the importance of workplace accommodations. We also offer ongoing support after employment begins, helping individuals adjust to their new roles and maintain long-term success. This kind of guidance is especially valuable for people who may be entering or re-entering the workforce after a long period of unemployment due to disability.

In addition to practical job support, our staff empower individuals with disabilities to understand their rights under laws like the Americans with Disabilities Act (ADA). They help clients advocate for reasonable accommodations and address any workplace challenges that arise. Ultimately, these services foster greater independence, confidence, and financial stability, enabling people with disabilities to pursue meaningful careers without fear of losing the support systems they rely on.

What sets Full Circle apart is its holistic, long-term approach. We help people during the VR process through fee-for-service benefits counseling. After someone completes services with VR, Full Circle can provide continued support through the TTW program and Partnership Plus. This includes regular check-ins, help finding new jobs if needed, benefits counseling or financial education. We offer comprehensive reports on how work affects benefits, assistance with setting up wage reporting systems or dealing with overpayments, and ongoing work incentive support. Through WIPA we continue to support individuals long term as well. Our teams are committed to helping individuals not just find a job but thrive in it—building a path toward financial independence and personal fulfillment.

Barriers to Work Under Current Systems

Even with the existing programs under the Ticket to Work act, there are still considerable obstacles. We see several things every day that could be improved upon to make each of these programs stronger.

Lack of Awareness

First there is a lack of awareness. SSA office staff often have very limited knowledge about the WIPA or Ticket to Work programs. They do a disservice to the programs by not knowing that they exist, which makes our job harder when trying to counter what beneficiaries may have been told. Programs like Ticket to Work and WIPA are designed to help beneficiaries reduce their dependence on SSA benefits. Both programs are underpublicized and underutilized. We believe SSA could expand education efforts, particularly targeted at young adults and underserved communities. EN marketing efforts through text or email campaigns and online outreach show high engagement rates—a sign people are hungry for information when it's accessible and clear.

Even more significantly, too many individuals don't know about their rights, options, or protections around work and benefits. We constantly advise clients and their representative payees who have received misinformation—or no information—about return-to-work rules. This fear often freezes people in place. We educate people daily on rules, protections, and tools that they're often hearing about for the first time.

Let me tell you about Kushal. Kushal is a person with muscular dystrophy and limited mobility. He started his return-to-work journey through the Illinois VR system. He achieved full time employment as a mental health crisis counselor. He very quickly realized that his work would impact his SSI, eliminate his Medicaid eligibility, and therefore his personal care support. He decided to stop working in order to keep the life-

sustaining care he needed. In time, he returned to the same company but said he could only work part time so he could keep his Medicaid and personal care support. A friend connected him to Full Circle's EN and benefits counseling. His TTW benefits counselor was able to review his situation and explained that he would likely be able to develop an individualized Medicaid threshold, thus giving him the ability to earn higher wages and keep his Medicaid eligibility. Once he got the education about his benefits, he jumped into full time work again. He, along with his benefits counselor, was able to get the individualized threshold approved. His SSI stopped and he's using the work incentive 1619b. He became a Certified Benefits Counselor and now works for a WIPA program where he promotes work while counseling beneficiaries about work incentives.

"Parking" Under SGA – A Common Behavior

Just as Kushal's story demonstrates how someone who receives SSI may choose to limit income in order to keep benefits, someone who gets SSDI may "park" just below the Substantial Gainful Activity (SGA) level. The SGA level for non-blind individuals in 2025 is \$1,620 per month. Many people intentionally keep their income just under that threshold—not because they don't want to earn more, but because going above it can trigger loss of benefits. This isn't fraud. It's a rational decision in response to unclear rules and the fear of irreversible loss. But it keeps people trapped in part-time poverty when they could be thriving in full-time roles. We need better policies to address this—not just to support transitions, but to reward growth.

Administrative Burdens

Social Security itself. SSA office staff often have very limited knowledge about the WIPA or Ticket to Work programs. They do a disservice to the programs by not knowing that they exist, which makes our job harder when trying to counter what beneficiaries may have been told. Programs like Ticket to Work and WIPA are designed to help beneficiaries reduce their dependence on SSA benefits. Both programs are underpublicized and underutilized. We believe SSA could expand education efforts, particularly targeted at young adults and underserved communities. EN marketing efforts through text or email campaigns and online outreach show high engagement rates, a sign people are hungry for information when it's accessible and clear.

Timely action is essential—delays compromise reliability and weaken relationships. As benefits counselors our job is to provide accurate and timely information to beneficiaries. However, we and beneficiaries often wait weeks—or months—for responses to documentation such as processing Work Activity Reports (Form SSA-821) or getting earnings posted to their records. The use of my Social Security Accounts helps some but are only useful if the actual employers are listed in the system. This is often delayed since it requires SSA to update the employers prior to reporting wages through the system. This causes beneficiaries to become frustrated and overwhelmed. It increases the likelihood of overpayments and can, in turn, cause beneficiaries to reduce work hours or quit their job—undermining the very goal of promoting economic independence and workforce participation.

The continued need for wet signatures on forms creates unnecessary logistical hurdles and additional operational costs for WIPAs, ENs and VRs. Most SSA forms allow for E-signature. However, the form SSA-3288, Consent to Release Information, is only accepted with an original ink-signed signature. This form is used to request the Benefits Planning Query (BPQY) which gives information about the benefits and work incentives a beneficiary receives and has used. We have had beneficiaries ask to sign electronically, because they can't sign with a pen due to their disability. We've mailed out releases that beneficiaries have never received or received but never sent back in the self-addressed envelope. Beneficiaries are worried that their personal data could be floating around unsecured. This is sometimes a deterrent from beneficiaries participating in employment supports with the EN or WIPA. Even when they can sign and return the form by mail, it often takes 2-3 weeks just to get the release back before even submitting to SSA to request the BPQY. E-signature adoption would dramatically streamline operations.

The Benefits Planning Query (BPQY) is supposed to be a planning cornerstone. But in reality, it's often outdated, slow to obtain, and confusing to interpret. Our typical process is to mail the SSA-3288 to our clients after the initial discussion. We follow up if we don't receive it within 10 days. Once we get the release back, we submit it to the local SSA field office by email as a secure partner or fax. We used to be able to follow up after 10 days, but SSA changed this to require us to wait 30 days before following up on obtaining the BPQY. We will follow up with the local field office at this point. If there is no response, we then follow up with the Area Work Incentives Coordinator (AWIC) who is usually able to send it to us or have the local office send it to us. Once we receive it, maybe at day 45, we review it and if there are any errors or questions, we have to go back to the AWIC to ask additional questions. Sometimes this requires a new release. At this point we can now begin assisting the beneficiary with work incentives advisement.

As you can see this often takes a very long time just to get to the point of verification. In a time sensitive case, such as with the Trial Work Period (TWP) ending, it can result in a substantial overpayment. We've experienced many beneficiaries having to wait over 8 weeks to receive a BPQY—only to find that earnings or work incentives had never been posted correctly. As planners, we're often left piecing together the puzzle using paystubs, SSA notices, and educated guesses. A modernized BPQY portal—integrated with real-time earnings data—could eliminate this friction.

As an EN, we also experience considerable administrative burdens which cause barriers to employment. Social Security implemented a new requirement for ENs to make 2-way contact with all assigned beneficiaries at specific times. This is good practice. However, the way SSA defined 2-way contact puts undue burden on ENs resulting in less participation from beneficiaries and ENs. Often when beneficiaries begin working, they no longer want to be contacted every 30 or 90 days. Yet ENs must do this or be out of compliance. ENs also experience payment delays. This is often the result of SSA not updating wage data timely or updating work records.

The TTW Marketing Program is a special program that enables SSA to provide approved ENs with large datasets containing beneficiary contact information. The goal is to support

outreach efforts and promote return-to-work for people with disabilities. Our organization has actively participated in this program. Prior to March 2023, the expectation was that as long as ENs demonstrated consistent growth and aimed for a 1% assignment rate, they could continue requesting large data files. However, SSA revised its criteria and began enforcing a stricter .5% assignment rate. This shift led many ENs to withdraw from the Marketing Program, resulting in reduced outreach and lower beneficiary engagement.

Full Circle experienced significant growth due to the opportunities provided by the Marketing Program. Unfortunately, the new limitations have curtailed the program's overall reach and effectiveness. I believe that the future success of the TTW program depends on expanding participation within the Marketing Program. Providing ENs with access to large datasets has proven to increase beneficiary engagement and improve employment outcomes.

Overpayments: A Major Deterrent

The greatest barrier we encounter is the fear—and reality—of overpayments. These are frequently caused by delayed processing and wage reporting gaps. I worked with an individual who had significant mental health challenges and received support from a local mental health provider. She wound up with an \$80,000 overpayment from years of working and incorrectly reporting. I was able to help her develop a Special Conditions work incentive and reduce her overpayment in half. One of our other benefits counselors worked with an individual who experienced a \$22,000 overpayment. The error stemmed from incorrect earnings data and months-long processing delays, despite proper reporting. We were able to document a Subsidy that ultimately reduced the overpayment to less than half—but this individual endured over a year of stress and uncertainty.

Beyond SSA's processing issues, overpayments are a barrier to work because of the ease in which they are acquired. The current rules around work often become the very disincentive keeping people from work. Some of the critical protections are:

- The Trial Work Period, which allows SSDI recipients to test work without immediately losing their benefits
- The Extended Period of Eligibility, which provides a safety net during work attempts
- Medicaid Buy-In programs that help people keep healthcare as they increase earnings
- Student Earned Income Exclusion for young people receiving SSI
- Impairment-Related Work Expenses (IRWEs), which can offset countable income
- Blind Work Expenses (BWEs), which excludes certain expenses specific to individuals with visual impairments
- And Expedited Reinstatement, which allows a return to benefits without reapplying if work doesn't pan out.

All of these work incentives are vital. However, it is not easy to navigate or develop any of them. At each step, there is the likelihood of incorrectly applying the work incentive to a person's record, not requesting it at all, SSA not knowing how to develop the work

incentive, and general delays resulting in overpayments. Many people who have overpayments have had significant challenges including losing other parts of their support system. They do not want to repeat the fear and stress, so they reduce their earnings capability. As a result, they simply walk away from work because the risk isn't worth it. They're making responsible choices, but the system isn't supporting them in return.

Opportunities and Recommendations

Full Circle's mission is to reduce barriers and create opportunities through the power of work. By offering compassionate, knowledgeable, and consistent support, we help individuals with disabilities take control of their futures and achieve their employment goals with confidence. There is still a lot to be done and many opportunities to improve the current systems. We believe TTW and WIPA remain crucial parts of the solution. But the system must evolve to meet modern expectations.

First, modernize processes like BPQY access and signature collection. Allow electronic signatures on all forms including the SSA-3288 Release of Information. This will drastically reduce wait times for individuals to get the benefits information needed to make informed decisions around work. Use existing technology such as the Ticket to Work portal or my Social Security accounts to share BPQY and other information securely with beneficiaries and approved ENs and WIPA providers.

Continue efforts to reduce overpayments through increasing work review and wage reporting processes. Invest in technology, such as expanding the Payroll Information Exchange (PIE)- to automate real-time earnings reporting. Continue to expand the my Social Security accounts ability to report wages and easily obtain employer information.

Most importantly, in my opinion, to strengthen and expand participation in the TTW program, the .5% assignment rate for the TTW Marketing initiative should be eliminated. This change would incentivize ENs to engage more actively, increase outreach to beneficiaries at no cost to SSA, and promote return-to-work outcomes. It would also enhance collaboration among ENs, WIPAs, VRs, and SSA—ensuring consistent, timely communication that supports beneficiaries in reducing reliance on benefits.

Closing

Finally, Chairman and Members of the Committee, as you examine ways to strengthen Social Security, reduce barriers and promote workforce participation among people with disabilities, I urge you to prioritize funding and support for the Ticket to Work programs and benefits counseling services. The Social Security system includes complex work incentive provisions designed to encourage employment, but without trained benefits counselors, these rules are difficult to understand and easy to misapply—often resulting in avoidable overpayments, underpayments, or complete disengagement from work. Benefits counselors provide critical one-on-one guidance, helping individuals understand how earnings affect their benefits and enabling informed choices about employment. Their work prevents financial crises, supports compliance with SSA rules, and ultimately

reduces long-term dependence on public benefits as well as contributes to the SSA trust fund. For individuals with disabilities, benefits counseling is not just helpful—it's essential to successful and sustained entry into the workforce. Investing in this service aligns with the Committee's commitment to efficiency, accountability, and economic inclusion.

The programs created under TWWIIA were visionary. They continue to provide structure, encouragement, and protection for individuals with disabilities ready to pursue work. But 25 years later, they need attention, modernization, and investment.

We owe it to our clients—to people like Joe, Kushal, Tom, like so many others—to clear the path ahead. With the right changes, we can make work truly work for everyone.

Thank you for the opportunity to speak with you today and for your leadership on this critical issue.