

**From:** Lipsky, Faye [mailto:Faye.Lipsky@ssa.gov]  
**Sent:** Thursday, August 23, 2007 1:59 PM  
**To:** Matsuoka, Karen Y.  
**Cc:** Davidson, Liz; Drew, Kathy R.  
**Subject:** RE: request for program consultation ICR

Karen,

See below for most recent responses.

1. Why does SSA believe this older process did not constitute an “information collection” under the PRA? (I think I know the answer, but I just wanted SSA to confirm).

Since this information is collected by the DDS as part of the disability process, old paper RPC process was considered to be part of 0960-0555, our blanket clearance for DDS collections. In that paper process, the rebuttal was initiated by the DDS registering a memo of disagreement and sending it to the Quality Branch – there was no official paper form used. However, with eRPC we are creating a new process with a specific format and screen shots, so we feel it is more appropriate for it to have its own OMB number.

2. How did they know to comment if they weren’t part of the pilot? Also, if they were not in the pilot, why would they comment in the first place (e.g. if they didn’t experience the pilot, how could they have an opinion about how well it worked?)

There are DDS direct participants, but the RPC also impacts (by changing the business process) OQP, the Regions, Office of Disability Determination, etc. who also commented. The eRPC process was demonstrated at Regional Offices, and OQP Branch Offices, and it was demonstrated at the National Conference of Disability Determination Directors, and at the National Association of Disability Examiners national training conference.

That is why people who were not part of the pilot commented on the process.

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Karen,

See below for response to your latest questions on eRPC.

The answer to the first question is that the prior rebuttal process was conducted via memoranda on Agency letterhead and sometimes supplemented by telephone. There was no OMB control number.

Why does SSA believe this older process did not constitute an “information collection” under the PRA? (I think I know the answer, but I just wanted SSA to confirm).

Paper folders are rapidly becoming obsolete, so the previous rebuttal system will cease when paper folders are no longer used.

OK

The answer to the second question is that the reference to the package already submitted refers to the current clearance package.

OK

There were only nine states involved in the pilot. We received comments from other SSA components, such as the Disability Quality Branches, as well as states not involved in the pilot.

How did they know to comment if they weren't part of the pilot? Also, if they were not in the pilot, why would they comment in the first place (e.g. if they didn't experience the pilot, how could they have an opinion about how well it worked?)

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**From:** Matsuoka, Karen Y.  
**Sent:** Tuesday, August 21, 2007 10:48 AM  
**To:** Davidson, Liz  
**Cc:** Lipsky, Faye; Drew, Kathy R.  
**Subject:** RE: request for program consultation ICR

Kathy, I had a couple follow-up questions on this ICR.

SSA's response to question 2 said, "Claims in paper folders will continue to follow the older rebuttal process." Is this a different OMB control number? Will this eRPC be merged with it in the future?

SSA's response to question 2 also said, "In the clearance package submitted to you earlier, the Office of Disability Programs included a proposal for DDS to limit its input to the name and social security number of the claimant, a reference to support its position, and a brief narrative explaining why the deficiency should be removed. We propose to modify the eRPC tool to accommodate this change." I just want to clarify: by "clearance package submitted to you earlier," is SSA referring to a separate ICR or this current package?

In the eRPC evaluation write up, there seem to be over 9 respondents (e.g. "11 of the 13 survey participants..."). Please clarify how many there were in the pilot for PRA purposes.

Thanks.

Karen

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**From:** Davidson, Liz [mailto:Liz.Davidson@ssa.gov]  
**Sent:** Wednesday, August 08, 2007 9:52 AM

**To:** Matsuoka, Karen Y.  
**Subject:** RE: request for program consultation ICR

Karen,

Attached are our responses. Thanks.

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**From:** Matsuoka, Karen Y.  
**Sent:** Friday, August 03, 2007 4:18 PM  
**To:** Davidson, Liz; Lipsky, Faye  
**Cc:** Kaplan, Jacob H. (OMB Examiner); Perry, J. Rhodes  
**Subject:** request for program consultation ICR

Liz, here are OMB's questions on the RPC ICR. I believe this is the last of the "priority" ICRs you asked us to review on an expedited timeframe. - Karen

1. the supporting statement says that this has been piloted on 9 DDSs. What have DDSs been using in the past for appealing regional quality assurance determinations?
2. what were some of the lessons learned from the pilot and what were the ensuing changes made to this ICR?
3. the supporting statement says there is a 3333 hour increase, but ROCIS says 2250. please clarify.