

**Supporting Statement for Paperwork Reduction Act Submission
Protection and Advocacy for Beneficiaries of Social Security (PABSS)
20 CFR 435.51-435.52
OMB No. 0960-NEW**

A. Justification

1. Legislative authority for this grant is in *section 1150* of the *Social Security Act* as added by *section 122* of *Public Law 106-170 (The Ticket to Work and Work Incentives Improvement Act of 1999)*, and amended by *sections 404* and *407* of *Public Law 108-203*.

In response to *P.L. 106-170*, the Social Security Administration (SSA) released a Request for Application on August 5, 2004 to competitively award grants to provide individuals with disabilities who receive Social Security Disability Insurance (SSDI) or Supplemental Security Income (SSI) benefits, information and advice about obtaining vocational rehabilitation and employment services in every State and U.S. Territory. The purpose of this grant is also to provide advocacy or other services that beneficiaries with a disability may need to secure, maintain, or regain gainful employment. The laws regarding monitoring and reporting program performance to SSA are found in *20 CFR 435.51-435.52* of the *Code of Federal Regulations*.

2. Awardees are protection and advocacy systems established under Title I of the Developmental Disabilities Assistance and Bill of Rights Act which submitted a timely application conforming to the requirements in the notice. The projects funded under this grant are part of SSA's strategy to increase the number of beneficiaries who return to work and achieve self-sufficiency as the result of receiving advocacy or other services.

The PABSS report is an aggregate report of activities of the PABSS organization. It is a summation of data variables of beneficiaries served by a PABSS organization. Individual beneficiary information is collected by the organization with the PABSS responsibility. There is no specific instrument that is used by the grantees to collect the information from the beneficiaries, as each has their own collection method that often covers protection and advocacy areas beyond the scope of SSA and PABSS. We do know that the collection process is usually electronic and/or accomplished through a personal interview with the beneficiaries.

The overall goal of the program is to provide information and advice about obtaining vocational rehabilitation and employment services and to provide advocacy or other services that a beneficiary with a disability may need to secure, maintain, or regain gainful employment. On a semi-annual basis, the PABSS project collects identifying and other information, such as eligibility for Social Security programs, primary disabilities, and types of services requested by

the beneficiaries from the project sites. We use the information to manage the program, with particular emphasis on contract administration, budgeting, and training.

SSA also uses the information to evaluate the efficacy of the program and to ensure that those dollars appropriated for PABSS services are being spent on SSA beneficiaries. The project data will be valuable to SSA in its analysis of and future planning for the SSDI and SSI programs. Respondents are potential grant awardees from establish community-based protection and advocacy projects.

3. It is estimated that 100 percent of the data collection is done electronically, i.e., the information is obtained during a personal interview with the advocacy group and the interviewer inputs the information into the data base. The data base is accessible via the Internet, but is only accessible by the interviewers, the contractor and SSA. The advocacy groups collect the data electronically from the beneficiaries using telephone interviews as well as face-to-face interviews during which the interviewer keys the responses into a computerized system. Each of the advocacy groups has their own, individual data system through which they collect information.
4. The nature of the information being collected and the manner in which it is collected preclude duplication. There is no other collection instrument used by SSA that collects data similar to that collected here.
5. This collection does not have a significant impact on a substantial number of small businesses because they are reimbursed.
6. The consequence to Federal or policy activities if the collection was not conducted would be that SSA would be unable to determine whether the projects increase income and self-sufficiency. Thus, SSA could not gather the information needed to support policy development. Since this information is only collected when a grant is requested, it cannot be collected less frequently.
7. There are no special circumstances that would cause this information collection to be conducted in a manner inconsistent with 5 CFR 1320.5.
8. The 60-day advance Federal Register Notice was published on July 31, 2006 at 71 FR 43270, and SSA has received no public comments. The second Notice was published on October 18, 2007 at 72 FR 59132. There have been no outside consultation with members of the public

The change in number of responses and burden hours since the publication of the First Federal Register Notice is due to the addition of the number of beneficiaries interviewed by the grantees in order to complete the PABSS report for SSA. The beneficiaries were inadvertently excluded from the prior Federal

Register Notice. We have added them now in order to rectify this oversight.

9. SSA provides no payment or gifts to the respondents.
10. The information provided on these forms is protected and held confidential in accordance with 42 U.S.C. 1306, 20 CFR 401 and 402, 5 U.S.C. 552 (Freedom of Information Act), 5 U.S.C. 552a (Privacy Act of 1974), and OMB Circular No. A-130.
11. The information collection does not contain any questions of a sensitive nature.
12. Following is a table that outlines the public reporting burden of the PABSS projects:

Type of Respondent	Number of Respondents	Frequency of Response	Number of Annual Responses	Average Burden per Response	Estimated Annual Burden Hours
PABSS Program Grantees	57	2	114	60	114
Beneficiaries	5,000	1	1	15	1,250
Totals	5,057		5,114		1,364

The total burden is reflected as burden hours, and no separate cost burden has been calculated.

13. There is no cost burden to cooperative agreement awardees because the Federal government will reimburse them.
14. The annual cost to the Federal Government is approximately \$7,000,000. The Ticket to Work and Work Incentives Improvement Act of 1999 authorizes up to \$7 million for cooperative agreements each year, up to 5 years (\$7,000,000 X 5 = \$35,000,000).
15. This is an existing collection in use without OMB approval that will increase the public reporting burden.
16. Results of the information collection will not be published.
17. SSA is requesting an exemption from displaying an expiration date. The PABSS projects will utilize a handout/computer screen containing the OMB Number, the Privacy Statement, and the Paperwork Reduction Act Statement. This is a five-year project, and it would not be cost-effective to require reprinting of the handouts simply because the OMB expiration date has been reached.
18. SSA is not requesting an exception to the certification requirements at 5 CFR 1320.9 and related provisions at 5 CFR 1320.8(b)(3).

B. **Collections of Information Employing Statistical Methods**

Statistical methods are not used for this information collection.