Addendum to the Supporting Statement for Form SSA-3368 Disability Report - Adult 20 CFR 404.1512 and 416.912 OMB No. 0960-0579

Terms of Clearance:

This ICR is approved consistent with the 12-19-07 memo and the agreed-upon revisions to the instrument to minimize respondent burden. Although this ICR has undergone numerous revisions in the past, the revisions have not been substantive enough to make previous editions obsolete. As per the 12-19-07 memo, previous versions of this form continue to be used until the stock is used up. For this reason, SSA is not required to print the expiration date for the OMB control number on these forms. However, should this form undergo more substantive changes in the future, SSA agrees to consider printing the expiration date on the forms.

In 2007, SSA complied with the agreed-upon revisions from the 12/19/07 memo with the exception of adding in a check box on p.10 for someone to indicate that the person filling out the form is, in fact, the disabled person. Rather, we have fully revised Section 2 of the form to comply more adequately with OMB's request. Since we are making substantive revisions the SSA-3368, we intend to destroy all previous stock upon OMB approval of the new revisions. As we do not intend to make further revisions to the SSA-3368 within three or more years after we implement these revisions, we request that OMB continue to grant us exemption from printing the expiration date on the revised paper form.

Revisions to the Collection Instrument

Upon acquiring the burden hour figures for this package, we discovered that the figures used in the FY07 OMB package for the SSA-3368 were inaccurate. The FY07 OMB package burden hours reflected the total number of receipts, which includes workloads that do not use the SSA-3368 (e.g. Reconsiderations, Hearings). The correct figure reflects only the receipts on initial claims, which in FY2007 were 2,524,211. This correction provides a logical increase for the FY2008 receipts of initial claims to 2,592,211. We used the State Agency Operations Report (SAOR) to document these figures.

As part of our revisions, we merged the best features of the i3368-PRO, such as, better navigation, the print function, and ability to jump to different sections of the application. We will discontinue the i3368-PRO with the rollout of the i3368 for both casual users and professional users.

In a continuing effort to streamline the electronic processes for the SSA-3368, some inconsistencies exist between the <u>order</u> of questions (not the content) on the electronic versions (EDCS and internet) and the paper version of this report. We reorganized some sections on the paper version of the SSA-3368 to provide a logical flow for self-help users. We organized the electronic versions to provide a logical path for an interview

flow or an internet user because the electronic versions are able to use information from one section to present subsequent questions tailored to the user. An example of these differences is the location of the request for medicine information from the claimant. Electronically, we ask for medicines after we have gathered information about doctors so we can display the doctors' names for association with each medicine. This keeps the user from having to type the doctor's name more than once.

Below are detailed explanations of how we changed individual sections:

Instruction cover sheet (paper only)

• We reworded the Instruction Cover Sheet for clarity.

Privacy Act Statement

- We adopted revised language provided by the Office of General Council's Office of Privacy Disclosure.
- The electronic versions of the Privacy Act will be identical to the paper version. We do not, yet, have a mock-up of the screen; however, prior to implementation, SSA's Office of Systems will create the screen.

Paperwork Reduction Act Statement

- We reformatted the paragraphs for readability.
- Below the PRA, we added a sentence referring users to <u>www.socialsecurity.gov</u> for more information.

Instructions below "For SSA Use Only"

• We added text to explain whose information the respondent should enter on the report.

Section 1 – Information about the Applicant

- We moved the request for the respondent's email address from the end of the form to 1.D. so that it appears along with all of the other information about the disabled person.
- We added more explanatory information about daytime phone number to accommodate users outside the United States. We also added a second contact number because so many people now have multiple phone numbers. We removed the option for "message number" because respondents selected it on only .007% of the EDCS cases between April 2008 and March 2009. The instructions still direct users to enter a message number if applicable.
- We added space for metric measures for height and weight to accommodate individuals outside the United States.
- We removed the question about medical assistance card number because research revealed it is not useful in developing a disability claim.

Section 2 – Contacts

• We renamed old question 1.D as new section "Contacts."

- We added a question about speaking and understanding English to this contact. If the contact does not speak and understand English, the DDS can arrange for an interpreter in the preferred language.
- We do not solicit an email address for the contacts because we cannot use such an address at this time because of privacy concerns.
- We added questions 2.F through 2.J to determine who is completing the report. This location on the paper report was preferred over the end of the report because it allows SSA to refer to the contact in 2.A, who may be the one completing the report. On the Internet, we ask this question at the beginning of the report so that we can dynamically present accurate pronouns (you or he/she) on the remaining screens. In addition, we ask for gender on the Internet so we can present accurate he/she pronouns.

Section 3 – Medical Conditions

- We split the old "Section 2 Your Illnesses, Injuries or Conditions and How They Affect You" into two sections "Medical Conditions" and "Work Activity" for clarity
- We reworded the question in section 3.A both for clarity and to support the Compassionate Allowance initiative that needs the stage and type of cancer. Electronically, we prompt for stage and type only if the respondent lists cancer as a condition.
- We reformatted this field to ask for medical conditions as a list, rather than in a large text box to emphasize the need to list conditions rather than symptoms. This also makes the information useful as electronic data.
- We removed old question 2.B (How do your illnesses, injuries, or conditions limit your ability to work?) from the SSA-3368 because it is not needed to begin development and in some situations it is not needed at all. We propose adding this question to the Function Report Adult SSA-3373-BK (OMB Control Number 0960-0681).

Section 4 – Work Activity

- This section elicits the date the condition became severe enough to prevent the claimant from working. We refer to this as the "alleged onset date."
- We added the question "Are you currently working?" to guide users to "onset" questions tailored to their circumstances. While on paper we must direct users to the next questions, users of the electronic versions see only the subsequent questions applicable to their circumstances.
- We restructured questions to capture when an individual stopped working, if he or she made changes to work activity before stopping work, and if so, when he or she made them. We eliminated specifics about changes in work activity because SSA claims representatives already capture these on a Work Activity Report (SSA-820—OMB Control Number 0960-0598, or SSA-821—OMB Control Number 0960-0059). The Work Activity Report is already part of the disability claims development process.
- We added a question about earnings to determine if the respondent needs development of substantial gainful activity (SGA). Each time the paper SSA-

3368 is printed, SSA will update these amounts with the monthly SGA amount for the second year prior to the printing, e.g. the 2009 printing will show the 2007 SGA amount. That will allow users whose onset date is in the past to respond appropriately to the question. Electronically, we present the SGA amount for the year that work activity changed.

- The electronic versions of the SSA-3368 will prompt claims representatives to complete a Work Activity Report if work above the SGA amount is alleged.
- We added checkboxes and an example for "Why did you stop working?"

Section 5 – Education and Training

- This section was formerly located in section 7 of the SSA-3368. We relocated Education and Training to this position because we believe it fits with Job information.
- We removed the line for street address of school since the respondents do not usually know it. The name of the school and the city are sufficient for the DDS to begin development.
- We removed the question about Type of Program because the individual does not necessarily know.

Section 6 – Job History (formerly part of Section 3)

- We renamed this section to avoid confusion with Section 4 -Work Activity.
- This section will now ask for only the last 5 jobs in the past 15 years because this is sufficient to begin development.
- This section asks for job details only if the individual had a single job in the past 15 years. Currently, the paper and EDCS SSA-3368 asks for details on the longest job, and the Internet asks for details about all jobs. If an individual has had more than one job, the DDS must request an SSA-3369 (OMB Control Number 0960-0578) at the point vocational history becomes material to development. This is not a change from current policy. We made this revision to keep individuals from listing details about a job more than once (on the SSA-3368 and on the SSA-3369). Research shows that in FY08, 63.4% of EDCS cases had more than one job. The respondent would not have completed this section in those cases.
- We made no changes to 6.B 6.I.

Section 7 – Medicines

- We relocated side effects to the SSA-3373-BK because they affect an individual's ability to function.
- We relocated the section for Medicines from Section 5 on the paper version of this report to encourage users to tell us about their medicines here instead of in the Medical Treatment question that asks about types of treatment to keep them from entering duplicate information. (Usability testing showed that users tended to list medicines in the treatment section when we presented it before the medicines section.) Electronically, we will collect medicines with each treating source, and present them later in a table for review so users can enter any additional medicines, including over-the-counter medications.

• We did not add medicines to the treating source page on the paper SSA-3368 because we believe that users tend to think of medicines based on when they are taken, rather than who prescribed them. Electronically, the function is served by allowing users to see a list of all the medicines they have entered regardless of who prescribed them.

Section 8 – Medical Treatment

- This section was formerly located in Section 4.
- We renamed this section title for clarity and brevity.
- We shortened questions 8.A and 8.B by combining past treatment with future appointment. We gather dates in the details about each treating source. We changed the terminology "illnesses, injuries or conditions" to "physical and/or mental condition(s) (including emotional or learning problems)" for clarity. We also reorganized the questions to make them easier to read.
- 8. C 8.G Details about treating sources.
 - We combined the collection of information about doctors and hospitals instead of having one section for doctors and another for hospitals. We made this change based on usability testing results.
 - We revised the question to support this format.
 - This redesigned page (and the following 4 identical pages) collects information about the treating source, regardless of the type. Usability testing with beneficiaries/recipients revealed they did not separate treating sources into categories like doctor and hospital when listing sources. They wanted to tell us about all their sources at once without separating doctors from hospitals.
 - We added test information to this page so users do not have to repeat the names of sources on subsequent questions about tests. This change contributed to making the report longer, but it reduced the burden because individuals do not have to write the name of the healthcare professional that sent them for the test, or the place where that healthcare professional performed the test.
 - Electronically, we also added medicines to this page.

Section 9 – Other Medical Information (old question 4.F)

- We made this a separate section for accuracy.
- We added "vocational rehabilitation" as an example in the types of sources.

Section 10 – Vocational Rehabilitation, Employment or Other Support Services Information (formerly Section 8)

- We added an explanation that the respondent answers this question only if he or she is already receiving SSI. It is specifically for use in Age 18 Redeterminations because SSA is required to make a new medical decision when SSI children attain age 18.
- We determined we do not need this information for initial claims.

Implementation Plan

Upon approval of the revisions, SSA's Forms Management Team will make the changes shown in the attached mock-up and reformat the paper version as they do with all other agency public use paper forms.

We scheduled implementation of the revised paper, EDCS and Internet SSA-3668 for December 2009. Because the i3368PRO will be retiring and PRO users will use the same internet application as the regular public, we will make the revised i3368 available to a select group of PRO users before implementing the new i3368 nationwide. We will begin this pilot usage of the i3368 in December 2009 for a few weeks. During those weeks, SSA will pre-select representatives from groups who regularly use the i3368PRO and follow their progress. In the Field Offices, SSA will select CRs to bring the information in the new i3368 and test how it interacts with the revised EDCS platform. Once we determine the new i3368 is working well, and that the PRO users accept it, we will release the revised i3368 to the public.

Once the revised i3368 is available nationwide, the "old" versions of the i3368 (i3368PRO and the current i3368) will be accessible only to users who began one of them prior to the national release but did not submit. Those users will continue to use the old URL and their re-entry number to return and finish. Once those users have terminated or completed their "old" i3368s, the old version will be retired. SSA expects this re-entry period to last no more than 6 months, because that is the allowable timeframe between when a user begins a report and when they must submit it.

We will destroy prior editions of the paper form as we are making major changes to the "onset" questions on the SSA-3368.