

**Supporting Statement for Paperwork Reduction Act Submission  
Protection and Advocacy for Beneficiaries of Social Security (PABSS)  
20 CFR 435.51-435.52  
OMB No. 0960-0768**

**A. Justification**

**1. Introduction/Authoring Laws and Regulations**

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 SSA extended these programs through February 28, 2011, and we anticipate renewal of the authority. *20 CFR 435.51-435.52* contain the laws regarding monitoring and reporting program performance to SSA.

**2. Description of Collection**

In August of 2004, SSA announced its intention to award grants to establish community-based protection and advocacy projects in every State and U.S. Territory, as authorized under *Section 1150* of the *Social Security Act*. Potential awardees were protection and advocacy organizations established under *Title I* of the *Developmental Disabilities Assistance and Bill of Rights Act*, which submitted a timely application conforming to the requirements listed in the 2004 announcement. The projects SSA funds under PABSS program 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 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 a beneficiary with a disability may need to secure, maintain, or regain gainful employment.

The PABSS Semi-Annual Program Performance Report collects statistical information from the various protection and advocacy (P&A) projects to manage program performance. SSA uses the information to evaluate the efficacy of the program, and to ensure beneficiaries are receiving the dollars appropriated for PABSS services. The project data is valuable to SSA in its analysis of, and future planning for, the Social Security Disability Insurance (SSDI) and

Supplemental Security Income programs. The respondents are the 57 designated P&A project system sites (in each of the 50 States, the District of Columbia, and the U.S. Territories), and beneficiaries of SSDI and SSI programs.

Staff from the advocacy organization interview beneficiaries and the interviewer inputs the information into the database. The database 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.

3. **Use of Information Technology to Collect the Information**  
In accordance with the agency's Government Paperwork Elimination Act plan, SSA created an Internet version of PABBS. Based on our data, we estimate approximately 100% of respondents under this OMB number use the electronic version.
4. **Why We Cannot Use Duplicate Information**  
The nature of the information we are collecting and the manner in which we are collecting it preclude duplication. SSA does not use another collection instrument to obtain similar data.
5. **Minimizing Burden on Small Respondents**  
This collection does not have a significant impact on a substantial number of small businesses or entities.
6. **Consequence of Not Collecting Information or Collecting it Less Frequently**  
If we did not collect this information, SSA would be unable to monitor program activities and outcomes, or to support policy development. Grantees collect this information at the point when a beneficiary seeks assistance from the grantee organization or when the P & A organizations complete requested services. Because we collect the information on an as needed basis, we cannot collect it less frequently.  
  
There are no technical or legal obstacles to burden reduction.
7. **Special Circumstances**  
There are no special circumstances that would cause SSA to conduct this information collection in a manner inconsistent with 5 CFR 1320.5.
8. **Solicitation of Public Comment and Other Consultations with the Public**  
The 60-day advance Federal Register Notice published on August 26, 2010, at 75 FR 52578, and we received no public comments. SSA published the second

Notice on November 12, 2010, 2010 at 75 FR 69516. If we receive comments in response to the 30-day Notice, we will forward them to OMB. We did not consult with the public on the revision of this application.

**9. Payment or Gifts to Respondents**

SSA does not provide payment or gifts to the respondents.

**10. Assurances of Confidentiality**

SSA protects and holds confidential the information it collects 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. Justification for Sensitive Questions**

The information collection does not contain any questions of a sensitive nature.

**12. Estimates of Public Reporting Burden**

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

The total burden for this ICR is 1,364. This figure represents burden hours and we did not calculate a separate cost burden.

**13. Annual Cost to the Respondents (Other)**

This collection does not impose a known cost burden to the respondents.

**14. Annual Cost To Federal Government**

The annual cost to the Federal Government is approximately \$7,000,000. This estimate is a projection of the cost for collecting the information.

15. **Program Changes or Adjustments to the Information Collection Request**  
There are no changes to the public reporting burden.
  16. **Plans or Publication Information Collection Results**  
SSA will not publish the Results of the information collection.
  17. **Displaying the OMB Approved Expiration Date**  
OMB granted SSA an exemption from the requirement to print the OMB expiration date on its program forms. SSA produces millions of public-use forms with life cycles exceeding those of an OMB approval. Since SSA does not periodically revise and reprint its public-use forms (e.g., on an annual basis), OMB granted this exemption so SSA would not have to destroy stocks of otherwise useable forms with expired OMB approval dates, avoiding Government waste.
  18. **Exceptions to Certification Statement**  
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**  
SSA does not use statistical methods for this information collection.