# Supporting Statement for Sheltered Workshop Wage Reporting OMB # 0960-0771

## A. <u>Justification</u>

### 1. Introduction/Authoring Laws and Regulations

Section 1612(1)(C) of the Social Security Act (*the Act*) and *42 USC 1382a* define remuneration received for services performed in a sheltered workshop as earned income for the Supplemental Security Income (SSI) program. The amount of monthly wages determines an individual's SSI payment amount.

## 2. **Description of Collection**

A sheltered workshop is a private non-profit or State or local government institution which provides individuals who have physical and/or mental impairments with services designed to prepare them for gainful work in the general economy. These services may include (but are not limited to) physical rehabilitation, training in basic work and life skills (how to apply for a job, attendance, personal grooming, handling money, etc.), training on specific job skills, and/or providing actual work experience in the workshop.

Because we share a common universe of clients, SSA has maintained a working relationship with sheltered workshops since the inception of the SSI program. Most workshops report monthly wage totals to the local SSA office so we can adjust the client's SSI check in a timely manner and prevent overpayments. While participation of the workshop is strictly voluntary, they are highly motivated to report the wages because it provides a service to their clients. Currently, there are three possibilities for Sheltered Workshop reporting.

- a. Reporting monthly on paper (mail or fax)
- b. Reporting electronically

The reports vary from workshop to workshop and run the gamut from extracts of their payroll records to manual summaries prepared by client workers on staff. There are no guidelines or handbooks. SSA does not require a specific format for the report. SSA meets with representatives from the Sheltered Workshop and explains that they should supply basic data, i.e., Name, Social Security Number, and total wages.

## 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 the Sheltered Workshop Wage Reporting System. Based on our data we estimate approximately 60% of respondents under this OMB number use the electronic version.

SSA offers an electronic option for reporting sheltered workshop wages through Government-to-Government Services Online. OMB # 0960-0757 clears the

registration process for the Government-to-Government Service Online.

## 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 significantly affect small businesses or other small entities.

6. **Consequence of Not Collecting Information or Collecting it Less Frequently**Sheltered Workshop reporting reduces the number of overpayments to SSI recipients. Processing these wage reports electronically reduces the cost of administering the program. If we did not collect the information, we would not be able to determine the savings. 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 January 03, 2011, at 76 FR 205, and we received no public comments. The 30-day FRN published on March 25, 2011 at FR 76 16847. If we receive any comments in response to this 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 payments 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

Approximately 900 respondents take 15 minutes each to complete the Sheltered Workshop Wage Reporting collection 12 times annually. Accordingly, the burden is 2,700 hours. This figure represents burden hours, and we did not calculate a separate cost burden.

The second Federal Register Notice shows incorrect burden information for the Sheltered Workshop Wage Reporting collection. We have corrected for this in the in #12 and on ROCIS.

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

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

#### 14. Annual Cost To Federal Government

The estimated cost to the Federal Government to collect the information is negligible. Because the cost of maintaining the system which collects this information is accounted for within the cost of maintaining all of SSA's automated systems, it is not possible to calculate the cost associated with just one Internet application.

## 15. Program Changes or Adjustments to the Information Collection Request

There has been a decrease in the number of burden hours. This decrease stems from estimated burden hours in the initial clearance. We are basing the new burden hours on actual usage data.

#### 16. Plans for Publication Information Collection Results

SSA will not publish the results of the information collection

## 17. **Displaying the OMB Approval Expiration Date**

SSA is not requesting an exception to the requirement to display an expiration date.

#### 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.