

**JUSTIFICATION FOR NON-SUBSTANTIVE CHANGE FOR
REQUEST FOR ACCOMMODATION IN COMMUNICATION METHOD
FORM SSA-9000
45 CFR 85.51
OMB No. 0960-0777**

Justification for Changes:

Background

On September 15, 2010, SSA received OMB approval to ask members of the public who request an accommodation under Section 504 of the Rehabilitation Act to explain and justify their request. With its original form, SSA-9000, the agency anticipated members of the public would explain why each of the agency's available notice formats was not suitable for them. However, after several months of using the approved form and intranet application to collect information from the public, the agency determined that members of the public were not providing the requested information, requiring the agency to recontact members of the public regarding their accommodation requests. We determined that we needed to ask questions more specifically to clarify for both agency employees and the public, exactly the information the agency needs to collect. We are requesting approval to ask more specific, clearer questions.

The iSNO behaves as if it is a few separate applications – Internet, used by the public; Intranet, used SSA claims representatives interviewing respondents; mini-path screens, used by SSA electronic legacy systems; and SSA's Office of General Counsel, who use it to adjudicate the accommodation request.

Paper Form:

Change 1: The "Accommodation Requested" question now comes after the "Condition that causes client to request an Accommodation" and "Explanation" questions.

(Old) The question "Condition that causes client to request an Accommodation" was after the "Accommodation Requested" question.

(New) We ask the "Condition that causes the client to request an accommodation" question first.

Justification 1: We want the clients to know all of the formats the agency provides before they choose which format they want. We think this will be helpful since we have found that many clients are requesting formats the agency already provides.

Change 2: Under the "Additional Accommodation Information," we changed from one question collecting information about each of our automatically granted formats to separate questions for each format.

(Old) Formerly we asked the client to explain why each of our currently offered accommodations (standard print by First Class or certified mail, Braille, Microsoft Word

file, and a telephone call) is not adequate for the client. Agency employees knew that we were providing large print and audio CD, so they should have also asked why those formats did not work for the client.

(New) The new fields are seven separate boxes. We now ask each question from the old screen as a separate question. We also provide clear instructions to the employee. We ask the following questions:

*Tell us why we cannot communicate with you by sending notices in standard print by first class mail.

*Tell us why we cannot communicate with you by sending you notices in standard print by certified mail.

*Tell us why we cannot communicate with you by sending notices in standard print by first class mail followed by a telephone call within 5 business days to read you the notice.

*Tell us why we cannot communicate with you by sending notices in Braille and in standard print, by first-class mail.

*Tell us why we cannot communicate with you by sending notices in a Microsoft Word file on a compact disc (CD) and in standard print, by first-class mail. Most screen readers should be able to read the Microsoft Word file on the CD. The Word CD will not work in an audio CD player.

*Tell us why we cannot communicate with you by sending notices in large print (18-point font) and in standard print, by first-class mail.

*Tell us why we cannot communicate with you by sending notices on audio compact discs (CDs) that contain a voice recording of the notice and in notices in standard print, by first-class mail. The audio CD should work in most CD players.

Justification 2: When we asked clients to explain why each format was not adequate, in most cases, they did not explain their reasoning for rejecting each format the agency offers. We must collect this information to decide whether to grant the client's 'other' accommodation request. We also wanted to ensure clients understood exactly how they would receive their notices (i.e. first class mail, standard print and Braille, etc), and to give them the greatest opportunity possible to explain why each particular format did not meet their needs.

Change 3: We changed the "Accommodation Requested" box to two separate questions.

(Old) We previously asked the client to select the Accommodation Requested from a drop down box. They could select "large print," "audio CD," or "other". We then asked the client to "Please list all accommodations that would enable client to participate fully".

(New) We have separated this into two questions. We first ask “In what format would the client like the notices” and allow the client to fill in the preference instead of providing a drop down box. Then we ask “Is there any other way we can communicate with you”

Justification 3: Again, we were not collecting enough information when we asked the questions together. We are separating the questions to ensure we collect the information we need to make a decision.

Electronic Screens

Change 1: On the screen entitled “Additional Accommodation Information,” the options for “Accommodation Requested” were radio buttons. The client can now choose audio CD, large print, or other. We also added (18-point font) to the large print option.

(Old) We listed “Accommodation Requested” options with a drop down box.

(New – January 29, 2010 Release) “Accommodation Requested” options are listed as radio buttons and Large Print now states Large Print (18-point font).

(Future – May 2011 Release) We will no longer list audio CD or large print, since SSA will automatically approve these formats if requested. Once clients state they want an ‘other’ accommodation, the SSA employee will ask which accommodation the client wants.

Justification 1: We added the radio buttons for technical functionality. We added 18-point font to make it clearer to the public what we mean by large print. We are making the future change when we can automatically grant audio CD and large print. At that time, we will no longer consider audio CD and large print as ‘other’ accommodations.

Change 2 (Future Change): On the screen entitled “Additional Accommodation Information,” the “Accommodation Requested” question will come after the questions “Explanation” and “Condition that causes client to request an Accommodation” .

(Old) The “Condition that causes client to request an Accommodation” question was after the “Accommodation Requested” question.

(Future) We will ask the “Condition that causes the client to request an accommodation” question first. Also, the Accommodation Requested question will no longer have radio buttons. Instead, the client will have to fill in a text box stating the accommodation they want.

Justification 2: We want the clients to know all of the formats the agency provides before they choose which format they want. We think this will be helpful since we have found that many clients are requesting formats the agency already provides. The future change will occur because the agency will automatically approve large print and audio CD requests, so they will no longer be ‘other’ accommodations.

Change 3: On the screen entitled “Additional Accommodation Information”, we added an instruction to SSA employees clarifying that they should not write the accommodation the client is requesting in the “Condition that causes client to request an accommodation” box.

(Old) The old screen only stated “Condition that causes client to request an Accommodation.”

(New) The new screen states “Condition that causes client to request an Accommodation. Do not write the client’s request in this box. If the client wants large print, 18-point font or audio CD and another format (i.e. large print, 18-point font and a phone call), you must select “Other”. If a client wants any format other than audio CD or large print, 18-point font (i.e. large bold print), do not write the request in this box. Select “Other”.

Justification 3: We discovered that many employees wrote miscellaneous information about the client’s requested accommodation in the “Condition that causes client to request an Accommodation” box. This is confusing for the public, the employees, and the SSA employee who rule on these requests.

Change 4: On the screen entitled “Additional Accommodation Information”, we changed from one question collecting information about each of our automatically granted formats to separate questions.

(Old) The old screen asked the client to explain why each of our currently offered accommodations (standard print by First Class or certified mail, Braille, Microsoft Word file, and a telephone call) is not adequate for the client.

(New) The new fields are seven separate boxes. We now ask each question from the old screen as a separate question. We also provide clear instructions to the employee. We ask the following questions:

*Tell us why we cannot communicate with you by sending notices in standard print by first-class mail.

*Tell us why we cannot communicate with you by sending you notices in standard print by certified mail.

*Tell us why we cannot communicate with you by sending notices in standard print by first-class mail followed by a telephone call within 5 business days to read you the notice.

*Tell us why we cannot communicate with you by sending notices in Braille and in standard print by first-class mail.

*Tell us why we cannot communicate with you by sending notices in a Microsoft Word file on a compact disc (CD) and in standard print by first-class mail. Most screen readers

should be able to read the Microsoft Word file on the CD. The Word CD will not work in an audio CD player.

*Tell us why we cannot communicate with you by sending notices in large print (18-point font) and in standard print by first-class mail.

*Tell us why we cannot communicate with you by sending notices on audio compact discs (CDs) that contain a voice recording of the notice and in notices in standard print by first-class mail. The audio CD should work in most CD players.

Justification 4: When we asked clients to explain why each format the agency granted was not adequate, in most cases, they did not explain their reasoning for rejecting each format the agency offers. The agency must collect this information to decide whether to grant the client's 'other' accommodation request. We also wanted to ensure the client understood exactly how she or he would receive his or her notices (i.e. first-class mail, standard print and Braille, etc), so we provided more information about each notice format.

Change 5: We changed the "Accommodation Requested" box to two separate questions.

(Old) We previously asked the client to select the Accommodation Requested from a drop down box. They could select "large print", "audio CD", or "other". We then asked the client to "Please list all accommodations that would enable client to participate fully".

(New) We have separated this into 2 questions. We first ask "What accommodation (notice format) do you want?" and allow the client to fill in the preference instead of providing a drop down box. Then, we ask "Is there any other way we can communicate with you"

Justification 5: Again, we were not collecting enough information when we asked the questions together. We are separating the questions to ensure we collect the information we need to make a decision.

Change 6: On the Summary Page, the Explanation section now summarizes each notice format based on the seven questions we added above.

(Old) Explanation

(New) Why we cannot communicate with the client by sending notices by first class mail:

*Why we cannot communicate with the client by sending notices in standard print by certified mail:

*Why we cannot communicate with the client by sending notices in standard print followed by a telephone call:

*Why we cannot communicate with the client by sending Braille notices in addition to standard print notices:

*Why we cannot communicate with the client by sending notices on a Microsoft Word data CD in addition to standard print notices:

*Why we cannot communicate with the client by sending notices on an audio CD in addition to standard print notices:

*Why we cannot communicate with the client by sending notices in large print (18-point font) in addition to standard print notices

(Future language)

*Why we cannot communicate with the client by sending notices by first class mail:

*Why we cannot communicate with the client by sending notices in standard print by certified mail:

*Why we cannot communicate with the client by sending notices in standard print by followed by a telephone call:

*Why we cannot communicate with the client by sending notices in Braille and in standard print by first class mail:

*Why we cannot communicate with the client by sending notices on a Microsoft Word data CD and in standard print by first class mail:

*Why we cannot communicate with the client by sending notices on an audio CD and in standard print by first class mail:

*Why we cannot communicate with the client by sending notices in large print (18-point font) and in standard print by first class mail:

Justification 6: We want the user (both the client and SSA employees) to see clearly why the client cannot use each format that the agency provides.

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