

SAMHSA SOAR Web-Based Data Form

Supporting Statement

A. Justification

The Substance Abuse and Mental Health Services Administration (SAMHSA) is requesting approval from the Office of Management and Budget for a SOAR Web-Based Data Form for case managers to use to maintain records on Social Security disability benefits applications, as part of the Supplemental Security Income (SSI)/Social Security Disability Insurance (SSDI) Outreach Access and Recovery (SOAR) effort. (See Attachment A for screen shots of the form.)

A. 1. Circumstances of Information Collection

In 2009 the Substance Abuse and Mental Health Services Administration (SAMHSA) of the U.S. Department of Health and Human Services created a Technical Assistance Center to assist in the implementation of the SSI/SSDI Outreach Access and Recovery (SOAR) effort in all states. SOAR's primary objective is to improve the allowance rate for Social Security Administration (SSA) disability benefits for people who are homeless or at risk of homelessness, and who have serious mental illnesses. SOAR has three main components: strategic planning for systems change, training for case managers and ongoing technical assistance.

During the SOAR training, the importance of keeping track of SSI/SSDI applications through the process is stressed, since the process is complex and involves several steps. In response to requests from states implementing SOAR, the Technical Assistance Center under SAMHSA's direction developed a web-based data form that case managers can use to track the progress of submitted applications, including decisions received from SSA either on initial application or on appeal.

In addition, data from the web-based form can be compiled into reports on decision results and the use of SOAR core components, such as the SSA-1696 Appointment of Representative which allows SSA to communicate directly with the case manager assisting with the application. These reports will be reviewed by agency directors, SOAR state-level leads, and the national SOAR Technical Assistance Center and SOAR national evaluation team to quantify the success of the effort overall and to identify areas where additional technical assistance is needed.

Section 501(d)(4) of the Public Health Service Act (42 USC 290aa) and Public Law 106-107 are the authorizing legislation for the SOAR web-based data form.

A. 2. Purpose and Use of Information

SOAR grew out of the Federal Policy Academy initiatives on chronic and family homelessness, where plans from most states identified a need to better access mainstream benefits to alleviate homelessness. Two primary benefits identified for this population are the SSA disability benefits, Supplemental Security Income (SSI) and Social Security Disability Insurance (SSDI). The SOAR TA Center has collected data on application outcomes for the last five years (2006-2010) from states that have initiated SOAR and have kept track of these data. These data demonstrate

the SOAR approach has increased the allowance rate on initial application for SSA disability benefits. One of the SOAR Technical Assistance Center's tasks was to simplify the tracking of application progress and decisions. To that end, the data form was developed and the Internet was chosen as a place to locate it because it was more universally accessible than using other Microsoft Office applications, such as Access. The web-based data collection form will assist case managers in keeping track of clients' disability applications.

Reports generated from the data collected will assist agency directors to monitor the allowance rates of individual case managers and to provide technical assistance and additional training as needed. On the state and national levels, including the national evaluation of SOAR, these reports also will be used to quantify the success of SOAR overall, measure the implementation of core SOAR components, and identify areas where additional technical assistance is needed.

Kinds of Information to Be Collected

Recognizing that the SOAR method can be used for initial applications, for applications initiated not using SOAR and for those in appeals, the SOAR data form has three distinct sections to it. (See below for a description of each section and Attachment A for screen shots of the form.) In addition to dates of application submission and decision, data elements include some of the more critical components of the SOAR process, including the submission of the SSA-1696 Appointment of Representative form, the collection of medical records by the case manager and the submission of a medical summary report. These data elements are included in all sections of the report. No personal identifying information, such as name, Social Security number or date of birth is collected using the form. Instead case managers assign a unique identifier to each case they enter. All data generated in the reports are either in the aggregate or averages.

New SOAR Application

The form for this section records the protective filing date (when SSA was first notified of an intent to file an application for disability benefits), when the application was submitted, whether there was a quality review of the application completed and was a Consultative Exam ordered. Other data include the date and result of SSA's decision and whether a representative payee was needed and provided.

SOAR – Initiated Reconsideration or Appeal

For applications initiated at the reconsideration or appeal level, data elements include whether SOAR staff initiated the appeal, whether an expedited hearing or review on records was requested, whether the applicant had an attorney, the date and outcome of the hearing and whether a representative payee was needed and provided.

Applications Not Initiated Using SOAR

For those applications that were already in process when SOAR was used, data elements include the date of first contact with the applicant, where the application was in the process, what decisions had been received and whether a representative payee was needed and provided.

A. 3. Use of Information Technology

SAMHSA chose an electronic, web-based data form to facilitate access to this data collection and case management tool. This password-protected web-based data form will be housed on the

SOAR website (www.prainc.com/soar). Using standard database programs, such as Microsoft Access, created software issues in terms of access to the program and version control. Reports can be generated and submitted electronically as part of this application, and SAMHSA anticipates that electronic submission will be used. No personal identifiers will be included in any report generated by this application, and it is in complete compliance with Section 508 of the Rehabilitation Act.

A. 4. Efforts to Identify Duplication

The information is collected only for the purposes of the SOAR effort and is not available elsewhere.

A. 5. Involvement of Small Entities

This data collection does not have significant involvement of small entities.

A. 6. Consequences If Information Collected Less Frequently

The use of this data form is completely voluntary. The SOAR Technical Assistance Center requests aggregate data from each state annually, but neither states nor individual programs implementing SOAR are required to use this form. They can choose other methods of data collection and management for SSA disability applications. If data are not collected, however, SAMHSA will be unable to make informed decisions about future funding for SOAR and how best to direct resources for technical assistance.

A. 7. Consistency With the Guidelines in 5 CFR 1320.5(d)(2)

This information collection fully complies with 5 CFR 1320.5(d)(2).

A. 8. Consultation Outside the Agency

The notice required in 5 CFR 1320.8(d) was published in the *Federal Register* on _____ Volume ____, page _____.

Seven representatives from three states, Maine, Nebraska and New Jersey, and staff of Mathematica Policy Research, which is conducting the national SOAR evaluation, were asked to review the prototype of the web-based data form for usability and navigation. Feedback provided was incorporated into the form. The table below lists participant’s names and contact information

Name	Agency	Address	Phone
Alisa Ainbinder	Mathematica Policy Research	Washington, DC	202-484-9220
Dennis Hoffman	Community Alliance	Lincoln, NE	
Jacqueline Kauff	Mathematica Policy Research	Washington, DC	202-484-9220
Robert Leonard	Iowa Institute for Community Alliances	Omaha, NE	712-256-8663
Tara Muir	Community Alliance	Omaha, NE	402 -341-5128
Tarry Truitt	Mercer Alliance to End Homelessness	Lawrence, NJ	609-844-1008
Jay Yoe	State DHHS	Augusta, ME	207- 287-8982

A. 9. Payment to Respondents

Respondents will not receive any payment.

A. 10. Assurance of Confidentiality

No personal identifying information is being collected and the form is password protected. Client-level application data will be stored on a secured (https) part of the Policy Research Associates’ (the Technical Assistance Center’s contractor) server. Reports will be submitted to agency and SOAR leads via email as an Excel spreadsheet. There are no identifiers in the data. The contractor’s Human Subjects Coordinator and Institutional Review Board chair met and concluded that this project meets the criteria for exemption from IRB review (45 CFR 46.1010(b)(5)(i)). A Certificate of Confidentiality is not required. Data will be kept private to the extent of the law.

A. 11. Questions of a Sensitive Nature

This information collection contains no questions of a sensitive nature.

A. 12. Estimates of Annualized Hour Burden

The annualized hour burden is summarized in the table below:

Form Name	No. of Respondents	Responses per Respondent	Total Responses	Hours per Response	Total Hour Burden	Hourly Wage Cost	Total Hour Cost (\$)
SOAR Data Form	800	36	28,800	.25	7,200	\$20	\$144,000

The hour burden estimate was calculated, including the number of responses and hours per response, based on informal testing of the prototype by representatives from three states (see A. 8.) The hourly wage cost was calculated using Bureau of Labor Statistics mean salary for mental health and substance use social workers (<http://www.bls.gov/oes/current/oes211023.htm>). Their estimated yearly salary is \$41,880. Since data will be entered primarily by case managers, we felt this category was the closest in the BLS data. The hourly wage for that salary is approximately \$20. It is also anticipated that case managers may enter data on an application more than one time. For example they may enter the demographic data and the protective filing date and then enter the form again to enter the date the application was submitted, so the time they will be in the form may vary.

A. 13. Estimates of Annualized Cost to Respondents

There is no capital/startup or operation and maintenance cost involved in collecting the information. Use of this web-based form is voluntary. If case managers do not have access to the web, they can use a variety of other methods of data tracking, such as HMIS, an Excel spreadsheet or paper forms (see B.2.)

A. 14. Estimates of Annualized Cost to the Government

The total estimated cost to the Federal Government for data collection activity for the three years remaining in the contract (effective 9/2011) is \$184,549. This includes the cost of the online database development (first year only), implementation and analysis by the contractor for the TA Center and 2% of a SAMHSA project officer’s time at \$100,000 annual salary (\$2,000) for each year of the contract. The cost for the first year is \$89,371 and the cost for each of the subsequent years is \$47,589. The annualized cost to the government is \$61,516 per year.

A. 15. Changes in Burden

This is a new project.

A. 16. Time Schedule, Publication and Analysis Plans

It is anticipated that once OMB clearance has been approved, data collection will begin immediately and will continue for as long as case managers track applications they submit using the SOAR model.

Outcome data on SOAR applications will be compiled and published annually by the SOAR Technical Assistance Center under SAMHSA's guidance from reports generated from this web-based data form. In addition, reports from the web-based data form will be used in the national evaluation of SOAR, which will be completed in October 2014. The SOAR Technical Assistance Center will seek renewal of OMB clearance every three years or when any modification is made to the form.

A. 17. Display of Expiration Date

The expiration date will be displayed.

A. 18. Exceptions to Certification Statement

This submission describing data collection requests no exceptions to the Certificate for Paperwork Reduction Act (5 CFR 1320.9).