

**Supporting Statement for
The Ticket to Work and Self-Sufficiency Program
20 CFR 411
OMB No. 0960-0644**

A. Justification

1. Introduction/Authoring Laws and Regulations

This information collection request (ICR) is necessary to administer the Ticket to Work Program authorized under *Section 1148* of the *Social Security Act*. The Ticket to Work Program provides Social Security Disability Insurance (SSDI) and Supplemental Security Income (SSI) beneficiaries with expanded options for access to employment services, vocational rehabilitation services, and other employment-related support as they work to decrease dependence on Federal cash benefits. SSA's Ticket to Work Program (TTW) transitions Social Security Disability Insurance (SSDI) and Supplemental Security Income (SSI) recipients toward independence by allowing them to receive Social Security payments while maintaining employment under the auspices of the program. SSA uses service providers, called employment networks (ENs), to supervise participant progress through the stages of ticket program participation, such as job searches and interviews, progress reviews, and changes in ticket status. ENs can be private for-profit and non-profit organizations, as well as state vocational rehabilitation agencies (VRs). SSA and the ENs utilize the Ticket to Work Program Manager to operate the TTW program and exchange information about TTW participants. For example, the ENs use Program Manager to provide updates on tasks such as selecting a payment system or requesting payments for helping the beneficiary achieve certain work goals. The Ticket to Work Program allows SSDI and SSI beneficiaries to choose an employment network (EN) service provider, who will guide and assist them in reaching their goals to obtain and retain self-supporting employment. These ENs are the primary respondents to the information collections (ICs) identified in this request, while SSDI and SSI disability beneficiaries are secondary respondents in a couple instances.

20 CFR 411.100-411.730 of the *Code of Federal Regulations* house the regulations for the Ticket to Work Program, including descriptions of the information collection requirements of the program. *Section 205(a)* of the *Social Security Act* gives the Commissioner of Social Security the authority to establish regulations for the Social Security Administration's programs.

2. Description of Collection

SSA requires ENs to submit multiple types of TTW program and participant information, resulting in 13 information collection instruments (described below in categories a-i; if we do not mention a specific form number, we require information in writing with no established form). We revised any forms to make them electronically fillable and to make needed content changes (see Addendum for more detail). In lieu of using the forms, EN service providers, including state vocational rehabilitation (VR) agencies, may provide the information for several of these collections through a new web-based Secure Provider Portal. We will pilot the use of this portal, which allows ENs to retrieve reports, and enter and submit various information electronically, minimizing the use of paper forms (see Addendum for more detail).

SSA offers training to service providers concerning program requirements of the regulations for any information collection listed below and for all modalities of collection, even when there is no form. Also, SSA assigns account representatives under the Ticket to Work Program Manager (PM) to each service provider to serve as an ongoing resource for any information they may need. If the regulation requires the EN, state VR agency or a beneficiary to notify us of something in writing, such as when they want to unassign a ticket, the PM will accept a written statement from any one of these entities making the request. The PM will accept the written request by regular mail, fax or email. The respondents for these collections are the ENs, and by extension, the TTW participants from whom they obtain information to complete some of these collections.

a. Establishing Ticket Assignments and Ticket Use

To establish ticket assignability, prior to the beneficiary having the ticket assigned to an EN or using it with a state VR agency, the EN may contact the PM to find out whether the beneficiary is eligible to use the ticket per *20 CFR 411.140(d)(2)*. The EN or state VR agency may contact the PM in one of three ways: 1) they may call the PM and speak to a live person who provides the information to them; 2) they may use the new Interactive Voice Recognition (IVR) telephone service, or 3) they may use the new Portal. No matter which method the ENs use to obtain the eligibility report, they must provide the PM with their DUNS as well as the beneficiary's SSN, and, in the case of live communication, the beneficiary's name.

Once the ENs establish ticket assignability, there are various ways a ticket holders may use their ticket with a service provider. Each way requires the service provider, which is either an EN or a state VR agency, to send the PM information signifying the relationship established between the agency and the ticket holder.

Form SSA-1370, Individual Work Plan (IWP) – Sections *20 CFR 411.140(d)(3)*, *411.150(b)(3)* and *411.325(a)*, require ENs (except state VR agencies acting as ENs) to submit an IWP to solidify a ticket assignment or reassignment and to inform the PM of amendments to the IWP. The IWP outlines the ticket holder's employment goals and the services the EN agrees to provide to help meet the goals and other information as described in *20 CFR 411.465*. Once it is available, an EN may use the Portal to select and transmit the IWP information, instead of using the fillable form.

Form SSA-1365, State Agency Ticket Assignment Form – Sections *20 CFR 411.140(d)(3)*, *411.150(b)(3)* and *411.325(a)* require the State VR agency to submit information establishing the ticket assignment using the form we prescribe. This brief form is essentially a signed statement that the State VR agency developed an individualized plan for employment toward which the ticket holder and the agency agree to work. Once it is available, an EN may use the Portal to select and transmit the IWP information, instead of using the fillable form.

Electronic Data Sharing – Amendments to the Ticket to Work and Self-Sufficiency Program in *20 CFR 411.166* and *411.170(b)* created a new ticket status called the "Cost Reimbursement Option" for when the ticket holder is using the ticket with the state VR agency under the traditional cost reimbursement payment method (i.e. the state VR agency is not acting as an EN). We cannot assign tickets in this status to an EN while the state VR agency has the case open. In support of this policy, we ask state VR agencies to inform us when ticket holders

work with them under this option. Instead of an individual paper form, they report to the PM monthly by emailing an electronic file (common delimited file). This file contains the names and Social Security numbers of all the ticket holders with whom they have begun working under this option during the reporting period and the effective date of the individualized plan for employment, which signifies the date the ticket is officially in-use with the state VR agency.

b. Requesting Ticket Unassignments and Notifying of VR Case Closures

Sections *20 CFR 411.145* and *411.325* require the beneficiary or the service provider who wants to take a ticket out of assignment to notify the PM. Likewise, in connection with the regulatory amendment mentioned in a. above, to support *20 CFR 411.535(a)(1)(iii)*, the state VR agency should inform the PM when it closes the case of a ticket holder that the state VR agency was serving under the cost reimbursement option. These notifications are important to monitor participation in the program and accurately reflect the ticket status of beneficiaries who are eligible to participate in the Ticket to Work Program and the periods of service for which an EN or state VR agency may be credited.

c. Tracking Progress

SSA may not initiate a medical Continuing Disability Review (CDR) while a beneficiary is using a ticket. If a ticket holder assigned the ticket or is using the ticket with the state VR agency under the cost reimbursement option, at the conclusion of each 12 month period of ticket use, we will request the beneficiary or the service provider to certify whether the ticket holder is making the expected progress. Months in which the ticket is in inactive status do not count towards the 12-month periods of ticket use for timely progress. There are three information collections associated with this provision.

Request to Place Ticket in Inactive Status – Section *20 CFR 411.192(b)* and *(c)* permits a ticket holder to request in writing that SSA deactivate and reactivate the ticket during a period in which the ticket holder becomes temporarily unable to make timely progress toward self-supporting employment. Upon receiving such a request, the PM transmits updated information to SSA so the inactive or reactivated ticket status will take effect. This information is important so the beneficiaries do not continue to be exempt from receiving a medical CDR while the ticket is inactive and so they regain exempt status when we reactivate the ticket.

Form SSA-1375 and SSA-L1377, Requests for Certification of Work and Educational Progress – Section *20 CFR 411.200(b)* indicates that if SSA's administrative records do not show the ticket holder met the work or educational requirement for the timely progress period, the PM will request the ticket holders complete Form SSA-1375 to let us know whether they met the progress requirements for the period. If the ticket holders do not respond, the PM will seek certification from the EN or State VR agency via the SSA-L1377. We gave state VR agencies the option of whether they want to provide information on behalf of Ticket holders who do not respond to our request. Only 36 of the 72 agencies chose to continue receiving these requests. As an alternative, an EN may use the Portal to select and transmit the SSA-L1377 information, instead of using the fillable form.

Note: We resend Form SSA-1375 if the ticket holder responds with insufficient information, allowing the beneficiary a final opportunity to certify progress with work and earnings before the adverse decision takes effect.

Request to reenter Ticket-Use Status after Not Making Timely Progress – Section 20 CFR 411.210(b) requires the ticket holder to send a written request for reinstatement to in-use status after not meeting the timely progress criteria. The PM will decide if the ticket holder met the applicable requirements. If so, the PM will transmit the updated ticket status change and the beneficiary will once again be exempt from a medical CDR.

d. Selecting a Payment System

Section 20 CFR 411.505 requires ENs to make their selection of a payment system at the time they enter into contract with SSA. Section 20 CFR 411.365 requires state VR agencies to send the PM a letter telling us which EN payment system they choose when functioning as an EN. Amendments to the Ticket to Work and Self-Sufficiency Program in 20 CFR 411.515 allow ENs and state VR agencies acting as ENs to change their EN payment system election once in each calendar year. We will use the elections and time periods they cover to identify the method of payment appropriate for compensating an EN or state VR agency when they file a request for payment under an EN payment system.

e. Reporting Referral Agreement Activity

Sections 20 CFR 411.400 – 411.420 explain that ENs and state VR agencies may have individual and broad-based agreements covering ENs' referral of beneficiaries, whose ticket assignments they hold, to state VR agencies for services. Section 20 CFR 411.325(d) and 411.415 require ENs to submit the agreements to the PM for verification prior to referring beneficiaries to the state VR agencies.

f. Requesting EN Payments

Section 20 CFR 411.575 requires ENs seeking milestone and outcome payments, including a state VR agency acting as an EN, to send a request for payment to the PM for each milestone or outcome payment attained. The payment request must include evidence of the ticket holder's work and earnings and or other documentation as required.

Form SSA-1391 is the Employment Network Payment Request Form. An EN may submit it with the SSA-1389, SSA-1393, SSA-1398 or SSA-1399 as necessary depending on the type of payment request. In addition, for ENs unable to obtain proof of earnings for their working ticket holder clients, the SSA-1396 allows the EN to request SSA to check its records for an indication of beneficiary's earnings. As an alternative, an EN may use the Portal to select and transmit the Earnings Inquiry Request or the payment request information, instead of using the fillable forms.

Split Payment Situations – in situations where more than one EN is eligible for a payment for the same period per 20 CFR 411.560 and 411.581, the ENs may submit an SSA-1401 asking the PM to determine a split in payment or proposing a split in payment upon which the ENs have agreed. The PM must approve the split payment percentages.

g. Reporting Periodic Outcomes

Section 20 CFR 411.325(f) provides that ENs must prepare periodic reports about their organizations. These annual reports contain information such as staffing size and experience, and the services the EN provides ticket holders. Information we previously obtained from ENs about outcomes, we now capture through our administrative data. In addition, this report will later be collected via the portal.

h. Dispute Resolution

The Ticket to Work Program provides a mechanism for dispute resolution when disputes involve beneficiaries, the PM, ENs, or state VR agencies. Section 20 CFR 411.435 provides that under certain circumstances ENs and state VR agencies that have a dispute related to an agreement between the two agencies may request the PM to recommend a dispute resolution. Sections 20 CFR 411.615 and 411.625 provide that a beneficiary or EN may advance a dispute resolution request to the PM and then to SSA.

i. EN Contract Changes

ENs must enter into an agreement with SSA per Section 20 CFR 411.320. After becoming an EN, if an organization wishes to make changes to certain information it provided, it should make the change using the SSA-1394, Employment Network Contract Change Form.

3. Use of Information Technology to Collect the Information

We use applicable automation when possible. To the extent possible, the PM will accept information from sources using electronic information technology. We have electronic data sharing for the two largest of the information collections described in this request. We also made the forms fillable and are giving service providers the option of transmitting information to us via email. In addition, we are adding the new fully electronic Secure ProviderPortal described in the addendum.

4. Why We Cannot Use Duplicate Information

The nature of the information collected and the manner in which it is collected preclude duplication. There is no other collection instrument used by SSA that collects data similar to that collected here.

5. Minimizing Burden on Small Respondents

The information collections in this request will not significantly affect a substantial number of small businesses. As of March 1, 2012 there are 1,043 ENs under contract with SSA, most of which are small businesses. About a third of them are active partners affected by most of the information collections in this request.

6. Consequence of Not Collecting Information or Collecting it Less Frequently

If SSA does not collect this information, we would not comply with some aspects of the Ticket to Work legislation, which may adversely affect the cost of operating the program. In addition, if SSA collected this information less frequently, we would not be able to adequately monitor activities affecting beneficiaries within the program. These information gaps could lead to less than adequate oversight of program compliance.

7. Special Circumstances

To manage the Ticket to Work Program, SSA must have up-to-date information concerning ticket assignments and unassignments, and the status of tickets under the cost reimbursement status with State VR agencies. Therefore, service providers must report this information to us close to the date of the action. Quarterly reporting would be insufficient. Otherwise, there are no special circumstances that would cause SSA to conduct this information collection in a manner inconsistent with 5 CFR 1320.

8. Solicitation of Public Comment and Other Consultations with the Public

The Emergency Federal Register Notice published on April 17, 2012 at 77 FR 22831, and SSA received no public comments. If we receive any comments in response to the Notice, we will forward them to OMB. SSA did not consult members of the public in the development or maintenance of this form.

The burden information we published on April 17, 2012 in the Emergency Federal Register Notice does not match the burden information listed below, as we inadvertently left out the burden for the Ticket Assignability information collection. We corrected that oversight in #12 below as well as in the Information Collection sections on ROCIS.

9. Payment or Gifts to Respondents

SSA provides no payment or gifts to the respondents.

10. Assurances of Confidentiality

The information provided is protected and held confidential 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 collections in this request do not contain any questions of a sensitive nature.

12. Estimates of Public Reporting Burden

Listed below are the burden hours for each of the IC instruments included in this request. The total burden reflects as burden hours, and SSA calculated no separate cost burden. All of the instruments are under the same OMB number.

a. Establishing Ticket Assignments and Ticket Use

Ticket Assignability.

Modality of Completion	Number of Respondents	Frequency of Response	Average Burden Per Response (minutes)	Estimated Total Annual Burden (hours)
20 CFR 411.140(d)(2) Regular Telephone	3,214	1	5	268
20 CFR 411.140(d)(2) Interactive Voice Recognition Telephone	12,856	1	2.5	536
20 CFR 411.140(d)(2) Portal	16,071	1	1.25	335

State agencies use Form SSA-1365 or the Portal. This report is mandatory.

Modality of Completion	Number of Respondents	Frequency of Response	Average Burden Per Response (minutes)	Estimated Total Annual Burden (hours)
20 CFR 411.140(d)(3); 411.325(a); 411.150(b)(3); SSA-1365	2,370	1	15	593
20 CFR 411.140(d)(3); 411.325(a); 411.150(b)(3); Portal	2,370	1	11	434

ENs in the private sector use the SSA-1370 or the Portal. This report is mandatory

Modality of Completion	Number of Respondents	Frequency of Response	Average Burden Per Response (minutes)	Estimated Total Annual Burden (hours)
20 CFR 411.140(d)(3); 411.325(a); 411.150(b)(3); SSA-1370	3,913	1	60	3,913
20 CFR 411.140(d)(3); 411.325(a); 411.150(b)(3); Portal	3,912	1	45	2,934

Electronic data sharing for State VR agency's tickets under cost reimbursement: (State/local/tribal Government – mandatory report, agencies may choose to submit electronically)

Modality of Completion	Number of Respondents	Frequency of Response	Average Burden Per Response (minutes)	Estimated Total Annual Burden (hours)
Electronic file submission – 20 CFR 411.166 & 411.170(b)	35,584	1	5	2,965

b. Requesting Ticket Unassignments and Notifying of VR Case Closures

Unassignments: (State/local/tribal Government primarily, or Individuals or Private Sector – voluntary to request unassignments)

Modality of Completion	Number of Respondents	Frequency of Response	Average Burden Per Response (minutes)	Estimated Total Annual Burden (hours)
20 CFR 411.145; 411.325	4,988	1	15	1,247
20 CFR 411.145; 411.325 Portal	4988	1	11	914

VR Case Closures: (State/local/tribal Government – voluntary for the VR agencies to close cases)

Modality of	Number of	Frequency	Average Burden	Estimated Total
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Completion	Respondents	of Response	Per Response (minutes)	Annual Burden (hours)
20 CFR 411.535(a)(1)(iii) Data Sharing/Portal	8,505	1	5	709

c. Tracking Progress

Request to Place Ticket in Inactive Status by submitting a written request to the PM per 411.192(b)&(c): (Individuals) No established IC instrument, and this is voluntary for the claimants.

Modality of Completion	Number of Respondents	Frequency of Response	Average Burden Per Response (minutes)	Estimated Total Annual Burden (hours)
20 CFR 411.192(b) & (c)	6	1	30	3

Request for Certification of Work and Educational Progress: Individuals – Respondents fill out either the SSA-1375.)

Modality of Completion	Number of Respondents	Frequency of Response	Average Burden Per Response (minutes)	Estimated Total Annual Burden (hours)
20 CFR 411.200(b); SSA-1375;	112,362	1	15	28,091

Request for Certification of Work and Educational Progress: (Private Sector or State/local/tribal Government.)

Modality of Completion	Number of Respondents	Frequency of Response	Average Burden Per Response (minutes)	Estimated Total Annual Burden (hours)
20 CFR 411.200(b); SSA-L1377	43,216	1	15	10,804
20 CFR 411.200(b); Portal	21,608	1	11	3,961

Request to reenter Ticket-Use Status after Not Making Timely Progress by submitting a written request to the PM per 411.210(b): (Individuals) No established IC instrument. – voluntary request for the claimants.

Modality of Completion	Number of Respondents	Frequency of Response	Average Burden Per Response (minutes)	Estimated Total Annual Burden (hours)
20 CFR 411.210(b)	41	1	30	21

d. Selecting a Payment System

(State/local/tribal Government primarily or Private Sector – mandatory selection)

Modality of	Number of	Frequency	Average Burden	Estimated Total
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Completion	Respondents	of Response	Per Response (minutes)	Annual Burden (hours)
20 CFR 411.365; 411.505;411.515	5	1	10	0

e. Reporting Referral Agreement Activity

(Private Sector – mandatory to report to SSA when an EN has an agreement with the state VR agency)

Report a new referral agreement to the PM per 411.325(d), and submit a copy of it to the PM per 411.415. No established IC instrument.

Modality of Completion	Number of Respondents	Frequency of Response	Average Burden Per Response (minutes)	Estimated Total Annual Burden (hours)
20 CFR 411.325(d); 411.415	1*	1	480	8

*(None received in 2010 or 2011)

f. Requesting EN Payments

(State/local/tribal Government primarily or Private Sector – the response time shows a total of all forms filled out for this section. Only the SSA-1391 is required for all EN payment requests. The only forms are required on certain types of payment claims.)

Modality of Completion	Number of Respondents	Frequency of Response	Average Burden Per Response (minutes)	Estimated Total Annual Burden (hours)
20 CFR 411.575; SSA-1389, SSA-1391, SSA-1393, SSA-1396, SSA-1398, SSA-1399	14,025	1	40	9,350
20 CFR 411.575; Portal	14,025	1	22	5,142
20 CFR 411.575; Automatic Payments	28,050	1	0	0

Split Payment Situations

(State/local/tribal Government primarily or Private Sector – mandatory to obtain partial payment)

Modality of Completion	Number of Respondents	Frequency of Response	Average Burden Per Response (minutes)	Estimated Total Annual Burden (hours)
20 CFR 411.560; SSA-1401	100	1	20	33

g. Periodic Outcomes Reporting

(State/local/tribal Government primarily or Private Sector – mandatory report)

Modality of	Number of	Frequency	Average Burden	Estimated Total
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Completion	Respondents	of Response	Per Response (minutes)	Annual Burden (hours)
20 CFR 411.325(f)	1371	1	60	1371

h. Dispute Resolutions

(State/local/tribal Government primarily, or Individuals/Private Sector – voluntary)

Modality of Completion	Number of Respondents	Frequency of Response	Average Burden Per Response (minutes)	Estimated Total Annual Burden (hours)
20 CFR 411.435; 411.615; 411.625	2	1	120	4

i. EN Contract Changes

(Private Sector – mandatory for all contract changes)

Modality of Completion	Number of Respondents	Frequency of Response	Average Burden Per Response (minutes)	Estimated Total Annual Burden (hours)
20 CFR 411.320; SSA-1394	210	1	10	35

ICR Summary of Burden

	Number of Respondents	Frequency of Response	Average Burden Per Response (minutes)	Estimated Total Annual Burden (hours)
Totals	333,793			73, 673

13. Annual Cost to the Respondents (Other)

There is no known cost burden to beneficiary respondents, and no known cost burden to business respondents above the customary cost of business recordkeeping equipment.

14. Annual Cost To Federal Government

SSA carries out these information collections as part of the PM’s contract and embeds them in their various workload processes. We estimate the cost of the PM processing these workloads to be \$7 million.

15. Program Changes or Adjustments to the Information Collection Request

We decreased the burden estimates for the paper SSA-1365 as we no longer require the use of this form for all cases. We decreased the annual reporting burden for the Request to reenter Ticket-Use Status (section c) based on more accurate data over the past year. Previously, we used a high estimate based on an educated guess, with the current data, we feel more confident in our new numbers. We reduced the response time for Selecting a Payment System (section d) as current data shows a more accurate time estimate. In addition, we increased the response time for the SSA-1389 to account for the new Part 2 we added (see Addendum for more detail). We also decreased the response time for Periodic Outcomes Reporting (section g) as we now accept this reporting electronically and we request less information since we capture some information as a by-product of operational activity.

Finally, we are adding the new Secure Provider Portal which will decrease the time burden for some of the collections listed above (see Addendum for more details). We estimate approximately half of all respondents will use the Portal rather than the paper forms.

All other increases and decreases to our burden estimates are based on current actual response data. We base our estimates on the average two-year actual responses (from the previous two years) for each instrument divided by two.

16. Plans for Publication Information Collection Results

SSA will not publish the results of these information collections.

17. Displaying the OMB Approval Expiration Date

SSA is not requesting an exemption from displaying the expiration date for OMB approval of these information collections.

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. Collection of Information Employing Statistical Methods

SSA does not use statistical methods for these information collections.