

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 (Pub.L.) 106-170 (The Ticket to Work and Work Incentives Improvement Act of 1999)*, and amended by Sections 404 and 407 of *Pub.L. 108-203. Pub.L. 113-6* authorizes the continuation of the PABSS program through September 30, 2014. In response to *Pub.L. 113-6*, the Social Security Administration (Social Security) released a Request for Application to award grants to 57 Protection and Advocacy (P & A) agencies in every State, U.S. Territory and the tribal nations, 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, and removing obstacles to attaining employment. The purpose of the PABSS grant is also to provide advocacy or other services that beneficiaries with disabilities may need to secure, maintain, or regain gainful employment.

2. Description of Collection

In March of 2013, Social Security announced its intention to award grants to reestablish community-based protection and advocacy projects in every State, U.S. Territories and the Hopi and Navajo tribal nations, as authorized under Section 1150 of the *Social Security Act*. Awardees are the 57 P & A organizations established under *title I* of the *Developmental Disabilities Assistance and Bill of Rights Act*. The PABSS projects are part of Social Security's strategy to increase the number of beneficiaries who return to work and achieve financial independence and self-sufficiency as the result of receiving support, representation, advocacy or other services. The overarching objective of the PABSS 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 National Disability Rights Network (NDRN) is a membership organization that holds a contract with Social Security to provide training and technical support to the PABSS grantees. As part of that contract, NDRN maintains a secure, proprietary internet database that grantees use to submit an annual report reflecting services they provide under PABSS funding. Only the PABSS grantees and the contractor have access to the database. The contractor generates each grantee's report annually, and sends each report, as well as an aggregate report including the total of all services PABSS grantees provide nationally, to the Social Security Contract Officer and to the Contract Officer's Representative.

This report, the PABSS Annual Program Performance Report (PPR), collects statistical information from each of the PABSS projects in an effort to manage and capture program performance and quantitative data. Social Security uses the information to evaluate the efficacy of the program, and to ensure beneficiaries are receiving quality services. The project data is valuable to Social Security in its analysis of and future planning for the SSDI and SSI programs. The respondents are the 57 PABSS project sites.

Advocacy and legal staff from each of the P&A organizations interview beneficiaries face-to-face or via telephone and the interviewers input the number and type of services into the database. The database reports only aggregate State and National data. There is no personally identifying information in the database.

3. Use of Information Technology to Collect the Information

In accordance with the agency's Government Paperwork Elimination Act plan, there is only an Internet version of the PABSS data collection system. 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. Social Security 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, Social Security would be unable to monitor program activities and outcomes, and could not inform or support related policy development. Grantees collect this information at the point when a beneficiary seeks assistance from the grantee organization and 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 Social Security 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 14, 2013, at 78 FR 49592, and we received no public comments. SSA published the second Notice on November 12, 2013, at 78 FR 67434. If we receive comments in response to the 30-day Notice, we will forward them to OMB. We did not consult with the public in the revision of this form.

9. Payment or Gifts to Respondents

Social Security does not provide payment or gifts to the respondents.

10. Assurances of Confidentiality

SSA protects and holds confidential the information we are requesting 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

Type of Respondent	Number of Respondents	Frequency of Response	Average Burden Per Response (minutes)	Estimated Total Annual Burden (hours)
PABSS Program Grantees	57	1	60	57
Beneficiaries	5,000	1	30	2,500
Totals	5,057			2,557

The total burden for this ICR is 2,557. 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 operating the 57 projects, providing training and technical assistance to the PABSS and collecting the information.

15. Program Changes or Adjustments to the Information Collection Request

The reduction in the public reporting burden is due to a program change resulting in a reduction in the number of responses per year for PABSS program grantees (see Addendum for more information).

16. Plans or Publication Information Collection Results

Social Security will not publish the Results of the information collection.

17. Displaying the OMB Approved Expiration Date

SSA is not requesting an exception to the requirement to display the OMB approval 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

This information collection does not use statistical methods.