

**Justification for Non-Substantive Changes for the SSA-9000  
Request for Accommodation in Communication Method  
45 CFR 85.51  
OMB No. 0960-0777**

**Background**

SSA submitted the OMB Clearance Package on Friday September 13, 2013 to renew the SSA-9000 (0960-0777). OMB approved the information collection request for 0960-0777 on November 6, 2013. On December 23, 2013, SSA submitted a Non-Substantive Change Request for 0960-0777, which OMB approved on January 13, 2014. This approved Change Request expanded SSA's scope for this information collection to include accommodations based on five broad categories of impairments: (1) blind or visual; (2) cognitive or learning; (3) deaf or hard of hearing; (4) mobility or physical; and (5) psychological or emotional. In addition, the Change Request enabled SSA to implement new SharePoint screens, the Section 504 SharePoint Tracker, to collect and track all disability accommodation requests we receive from public. SSA implemented the Section 504 SharePoint Tracker in early February 2014.

Per the approved Change Request documentation, SSA uses the Section 504 SharePoint Tracker automated process to capture and manage all requests for accommodation from SSA applicants, recipients, and representative payees with any disability, not just blind and visually impaired individuals. SSA employees continue using the SSA-9000 Intranet process to document when Social Security applicants, recipients, and representative payees request an alternative method of receiving notices or other related communications as a Special Notice Option.

**Revisions to the Information Collection**

As discussed in the Future Plans section of the Change Request approved on January 13, 2014, SSA implemented the Section 504 SharePoint Tracker as an interim step to centralize the disability accommodations request process, and planned to develop an integrated Intranet application, iAccommodate.

The iAccommodate automated application will track accommodation requests (including standard Special Notice Options); retain accommodation requests for future contacts from individuals; provide SSA an electronic means of maintaining and processing non-standard accommodation requests; streamline the process by interfacing with other SSA systems; and provide SSA robust Management Information (MI). In addition, the iAccommodate application will replace the interim 504 SharePoint Tracker, which is a stand-alone application.

Although this new application will replace the interim 504 SharePoint Tracker, it will not replace the existing Special Notice Option application. Employees will be able to use iAccommodate to capture and manage Special Notice Options for blind and visually impaired individuals, and track Special Notice Option requests for blind or visually impaired individuals. However, SSA will continue using the current SSA-9000 for blind or visually impaired individuals who request a notice option other than the Special Notice Options already offered to have effective communication with SSA.

In the future, SSA plans to develop an Internet application for members of the public to request accommodations. The Internet application will allow SSA to receive accommodation requests (including Special Notice Option requests) through one centralized electronic application.

SSA is submitting this Change Request to meet our planned July 2014 implementation date for the iAccommodate automated process. SSA's new application will allow SSA to use an Intranet-based automated system to record a request for an accommodation when a member of the public indicates a need for an accommodation based on a disability in order to conduct business with SSA. Many of the disability advocacy groups are awaiting the implementation of SSA's new Section 504 initiatives. This enhanced automated process is a critical component in enabling SSA to capture all accommodation requests agency-wide and to ensure consistency in the way that requests are processed and provided.

We intend to make the following changes to this information collection:

- **Change #1:** SSA is expanding the scope for this information collection to capture accommodation requests received from all members of the public, and not just current SSA disability applicants or recipients.
- **Justification #1:** Currently, this collection only records accommodation requests from SSA applicants, recipients, and representative payees based on five broad categories of impairments: (1) blind or visual; (2) cognitive or learning; (3) deaf or hard of hearing; (4) mobility or physical; and (5) psychological or emotional. Allowing accommodation requests from all individuals with a disability, regardless of their current status in SSA's records, further ensures SSA's compliance with Section 504 of the *Rehabilitation Act of 1973*. In this way, SSA will meet the requirement to provide meaningful access to our programs and activities for all qualified individuals with disabilities.
- **Change #2:** SSA is adding new Intranet screens, the iAccommodate process, to collect and track all disability accommodation requests we receive from the public.

**Justification #2:** Currently SSA uses the SSA-9000 process to determine, based on applicable law and regulation, whether to grant an individual's request for an accommodation based on their blindness or other visual impairment, and employees key in the information on SSA Intranet screens. In addition, effective February 2014, SSA began using the Section 504 SharePoint Tracker automated system to track accommodation requests for applicants, recipients and representative payees who request accommodations outside of the Special Notice Option arena, regardless of the disability category. Although this new application will not replace the existing SSA-9000 Special Notice Option application, employees will use the iAccommodate application to capture and manage Special Notice Options for blind and visually impaired individuals.

SSA employees will continue using the SSA-9000 Intranet process to document when Social Security applicants, recipients, and representative payees request an alternative method of receiving notices or other related communications as a Special Notice Option based on blindness or visual impairment. However, employees will also use the new iAccommodate Intranet process to track accommodation requests for any individual requesting an

accommodation (other than those that must use the current SSA-9000 process). The new Intranet process will replace the Section 504 SharePoint Tracker automated system.

Furthermore, the iAccommodate process will increase the agency's ability to monitor disability accommodation requests received, manage referrals and approvals, review for consistent administration of accommodations agency-wide, and provide enhanced management information data.

### **Description of the iAccommodate Intranet Automated Screens**

#### ***SSA IMain screen:***

- This screen provides a list of various selections employees can choose. From this screen, employees will select the "Person Information (Identity, Contact, Accommodation)" link to proceed with the iAccommodate process.

#### ***Person Information – Query screen:***

- The title bar of the screen provides links to the Paperwork Reduction Act and Help.
- The second portion of the screen contains a field for employees to enter a Social Security Number, and information about, as well as a link to the Privacy Act Statement.
- The last portion of the screen provides an option to "Query" the Social Security Number entered in the "SSN" field on the screen.

#### ***Person Information – Results screen:***

- The title bar of the screen provides links to the Paperwork Reduction Act and Help.
- This screen displays the results of an employee entering a Social Security Number on the previous screen (i.e., Person Information – Query screen).
- This screen displays four sections regarding an individual's identity:
  - Identity Information – displays the following basic identifying factors (i.e., Social Security Number, Name, Sex/Gender, Date of Birth, Proof of Birth Code, Place of Birth, Mother's Maiden Name and Father's Name).

The section also contains an "Edit" box if an employee needs to update an individual's information. If the employee selects "Edit," the Person Information-Identity Information screen will display for the SSA employee to update the requestor's identity information. The option to "Save" or "Cancel" the information entered on the screen appears at the bottom of the screen. This "edit" feature will not be available in the July release, but in a subsequent system maintenance update.

- Death Information – displays an annotation regarding death information.

(This will ensure that SSA employees properly screen an individual if the record displays a date of death. If death information is present, an employee will not be able to proceed with entering an accommodation request.)

- Contact Information – displays basic contact information about an individual (i.e., Phone, Email, Spoken Language Preference, Written Language Preference, and Contact Address).

The section also contains an “Edit” box if an employee needs to update an individual’s information. If the employee selects “Edit,” the Person Information-Contact Information screen will display for the SSA employee to update the requestor’s contact information. The option to “Save” or “Cancel” the information entered on the screen appears at the bottom of the screen.

- Accommodation Information- displays the following information about any accommodations an individual may have requested:
  - Active Accommodations, Request Date, Occurrence.
  - Non-Standard Accommodations, Request Date, Occurrence, Status.

The section will display any accommodation request(s) an SSA employee has annotated within the iAccommodate application for the displayed Social Security Number. This section will display “No records found” if an individual has not notified SSA of an accommodation request within the iAccommodate process.

The section also contains an “Edit” box if an employee needs to add or modify an individual’s accommodation request information.

- The options to “Accept” or “Cancel” the information entered on the screen.

***Person Information – Requests for Reasonable Accommodation screen:***

- **NOTE:** This screen automatically appears if an SSA employee selects “Edit” Accommodation Information on the previous screen (i.e., Person Information – Results screen). An SSA employee would use this screen if a member of the public contacts SSA to add or modify an accommodation request.
- The first portion of this screen displays the individual’s Social Security Number and Name. (This data is propagated from the previous screen (i.e., Person Information – Results screen).
- The second portion of this screen (Request for Reasonable Accommodation) informs the SSA employees that they are on the “Provide Information” section of the request for accommodation process. This portion also provides links to the Paperwork Reduction Act and Privacy Act Statements.
- The third portion of the screen (Request Information) lists the following mandatory fields SSA employees should complete:
  - Request Date
  - SSA Office Code where the accommodation is requested
- The fourth portion of the screen (Accommodation Approved Today) contains the following:
  - Special Notice Options section

- The ability to Show or Hide the Special Notice Options.
- A Help link for SSA employees to obtain more information about the Special Notice Options.
- A link for SSA employees to visit the Special Notice Options website.
- Policy links for SSA employees to obtain more information about the Special Notice Options.
- A list of standard Special Notice Options (SNO). SSA employees will choose the appropriate selection for SSA applicants, recipients or representative payees, based upon the requestor's input.
  - Standard print notices sent by first-class mail
  - Standard print notices sent by certified mail
  - Standard print notices sent by first-class mail and a follow-up telephone call within 5 business days to read the client the notice
  - Standard print notices and Braille notices sent by first-class mail
  - Standard print notices and data compact disc (CDs) that contain a Microsoft Word file sent by first-class mail
  - Standard print notices and audio compact discs (CDs) that contain a voice recording of the notice sent by first-class mail
  - Standard print notices and large print (18-point font) notices sent by first-class mail

The Impairment Type field displays “Blind or Visually Impaired.” Since the Special Notice Options are only for individuals who are blind or visually impaired, the Impairment Type field will not provide employees any other impairment code options.

- The option to “Undo Change”

If individuals who are not claimants, applicants, recipients, individual representative payees, or not “Blind or Visually Impaired” requests a Special Notice Option they must select from the “Non-Standard Accommodations” section of the screen. The SSA employee will refer the accommodation request to the Center for Section 504 Compliance.

o Standard Accommodations section

- The ability to Show or Hide the Standard Accommodations.
- A Help link for SSA employees to obtain more information about the Standard Accommodations.
- Policy links for SSA employees to obtain more information about Standard Accommodations.
- A list of standard accommodations. SSA employees will choose the appropriate selection based upon the requestor's input:
  - Certified and Qualified Sign Language Interpreter.
  - Certified and Qualified Video Remote Sign Language Interpreter (VRI).
  - Handwritten notes.
  - Lip reading or speech reading.

NOTE: Although these standard accommodations can be made available in every office, not every office will be able to provide them immediately upon request. Some standard accommodations may require advance notification from the requesting party, and coordination with other SSA offices to obtain the requested accommodation.

- SSA employees must also select the impairment type indicated by the requestor. The impairment types include Blind or Visually Impaired, Deaf or Hard of Hearing, Cognitive or Learning, Mobility or Physical, Psychological or Emotional and Other.
- SSA employees must also indicate if the accommodation request is for a one-time occurrence. If the SSA employee does not check the ‘One Time’ field, the system will automatically annotate the request as a recurring one.
- Locally-Available Accommodations section:
  - The ability to Show or Hide the Locally-available Accommodations.
  - A Help link for SSA employees to obtain more information about Locally-available Accommodations.
  - Policy links for SSA employees to obtain more information about Locally-available Accommodations.
  - A list of locally-available accommodations. SSA employees will select from a list of accommodations available in their particular SSA office:
    - Social Security employee who is a Qualified Sign Language Interpreter.
    - Social Security employee who know American Sign Language (ASL).
    - CapTel service.
    - Hearing Loop.
    - Real-time Court Reporting.
    - UbiDuo face-to-face communicator.
    - Bariatric Chair.
- SSA employees must also select the impairment type indicated by the requestor. The impairment types include Blind or Visually Impaired, Deaf or Hard of Hearing, Cognitive or Learning, Mobility or Physical, Psychological or Emotional and Other.
- SSA employees must also indicate if the accommodation request is for a one-time occurrence. If the SSA employee does not check the ‘One Time’ field, the system will automatically annotate the request as a recurring one.
- Other Accommodations section:
  - The ability to Show or Hide the Other Accommodations.
  - A Help link for SSA employees to obtain more information about Other Accommodations.
  - SSA employees can annotate any other accommodations provided to the requestor.
  - SSA employees must also select the impairment type indicated by the requestor. The impairment types include Blind or Visually Impaired, Deaf or Hard of Hearing,



- The second portion of this screen informs the SSA employees that they are on the “Confirmation” section of the request for accommodation process.
- The third portion allows SSA employees to see that they have successfully completed the accommodation request. The screen displays the accommodations requested.
- The option to click “Done.”

***Description of the iAccommodate process Usage:***

- If a member of the public indicates a need for assistance or requests an accommodation to conduct business with SSA, SSA employees in Field Offices, Hearing Offices, and National 800 Number Call Centers will use the iAccommodate process to record the accommodation request. The SSA employee will refer to a list of standard accommodations shown in the iAccommodate application, and will route any non-standard accommodation requests to the Center for Section 504 Compliance for further processing. SSA employees will ask individuals for their Social Security Number in order to retain records of an individual’s request for future contacts with SSA. In addition, SSA will document the transaction for management information purposes.
- If a member of the public requests and receives an accommodation, an SSA employee will complete the Person Information – Requests for Reasonable Accommodation screen by annotating the type of accommodation(s) SSA provided for the individual.
- If members of the public request an accommodation and need to update their contact information, the SSA employee will ask the requestors for the following information and confirm the answers propagated on the Person Information – Results screen:
  - o Social Security Number
  - o Name
  - o Phone Number
  - o Contact Address

In addition, the SSA employee will annotate the answers for the following information:

- o Impairment type as indicated by the requestor.
- o Indication if the accommodation is for a one-time occurrence.
- o Description of the disability/impairment that causes the individual to request a non-standard accommodation.
- o Explanation as to why SSA cannot communicate with the requestor with one of the standard accommodations.
- o The non-standard accommodation the requestor prefers.
- o Any alternative accommodations that will work for the requestor.

**Burden Information:**

We based previous burden estimates for the Section 504 SharePoint Tracker respondents on calculations done to estimate preliminary administrative costs for the overall Section 504 initiative. However, after the initial implementation of the Section 504 SharePoint Tracker in

February 2014, we discovered that the actual number of respondents is significantly lower than expected. Since the iAccommodate Intranet site will replace the Section 504 SharePoint Tracker, we based our new estimate on actual usage of the Section 504 SharePoint Tracker. SSA will decrease the public reporting burden as indicated below.

<b>Modality of Completion</b>	<b>Number of Respondents</b>	<b>Frequency of Response</b>	<b>Average Burden Per Response (minutes)</b>	<b>Estimated Total Annual Burden (hours)</b>
SSA-9000 (paper form and screen shots)	1,417	1	20	472
iAccommodate Intranet Application	8,000	1	10	1,333
<b>Totals</b>	<b>9,417</b>			<b>1,805</b>

**Note:** We do not expect any significant increase in respondents for the change in scope; however, if we note an increase to our estimated number in the chart above, we will inform OMB via Change Request.

**Plans for Implementation**

SSA plans to implement this change in **July 2014**, upon OMB’s approval.

**Future Plans**

As mentioned earlier, the iAccommodate process is an Intranet application which will centralize the disability accommodations request process, and replace the Section 504 SharePoint Tracker. In the future, SSA will implement an Internet application, which will ultimately interface with the SSA-9000 Special Notice Option Internet screens. Our future Internet version will allow the respondents to complete the application directly, rather than through a personal interview with an SSA employee. SSA will submit a Change Request to OMB when we are ready to implement the new Internet application.