**Justification for Non-Substantive Changes to**

**The Ticket to Work and Self-Sufficiency Program**

**OMB No. 0960-0644**

**Background**

The Social Security Administration (SSA) is requesting approval for a non-substantive change to the information collection for the Ticket to Work and Self-Sufficiency Program (Ticket Program), authorized under Section *1148* of the *Social Security Act*. The Ticket Program provides Social Security Disability Insurance (SSDI) and Supplemental Security Income (SSI) recipients 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 payments.

SSA’s Ticket Program, regulated under the Code of Federal Regulations (CFR) at *20 CFR 411.100-411.730,* helps SSDI and SSI recipients transition towards financial independence by providing them free employment support services to reduce or eliminate reliance on Federal cash payments. SSA partners with service providers called employment networks (EN’s) to supervise participant progress through the stages of Ticket Program participation, such as job searches and interviews, progress reviews, and changes in ticket status. EN’s can be private for-profit and non-profit organizations, as well as state vocational rehabilitation (VR) agencies and other State and local government agencies. SSDI and SSI recipients choose an EN service provider with whom they can assign and use their Ticket to return to work or increase work. EN’s are responsible for guiding and assisting SSDI and SSI recipients in reaching their goals to obtain and retain self-supporting employment. EN’s, including state VR agencies, are the respondents to the collection instruments affected by this change.

In 2012, we gave EN’s the option of using the Secure Provider Portal instead of paper forms to address many of the administrative requirements of the Ticket to Work regulations and their contracts. The Secure Provider Portal is a web-based application that allows service providers to review or submit information specific to their organization. The portal has become indispensable to the EN’s that have used it. It decreases the administrative burden associated with processing and sending paper forms and tracking the status of actions relative to their program participation.

SSA is assuming and renaming the Secure Provider Portal currently supported by an SSA contractor-owned system called MAXSTAR and maintained on the contractor’s website. We are renaming the portal the Ticket Portal. Having the Ticket Portal under SSA supports a more secure, efficient, and cost effective administration and operation of the Ticket to Work Program.

EN’s will now designate two portal users per business location, unless business reasons support an exception. This is a more secure process for gaining entry to the portal. The user must pass two-factor authentication with “extra security” by obtaining credentials required to access their MySSA account; and for each portal session, they must receive a text message to their smart phone with a security code allowing entry. In addition to two-factor authentication, the user must have SSA authorization to use the portal based on current employment with an EN, having an active SSA security clearance, which includes maintaining annual training, and having not been suspended from the portal in the last 90 days.

**Summary of the Non-Substantive Changes**

In addition to creating a more secure portal, we are making the Ticket Portal easier to navigate and it will increase automation of various business processes, requiring less information and data entry from ENs.

* The EN user will be able to access a menu to select information they’d like to view or a function they’d like to perform. If the user selects a list, they will be able to perform multiple functions regarding an individual from a single list (DemoDeck.pptx slides 3–5).
* The Ticket Portal will connect to SSA’s internal Ticket Operations Support System (iTOPSS), which will allow it to process EN requests using information already in the system when appropriate; eliminating the need for ENs to provide information we already have and for us to verify information by manually looking up the information in iTOPSS. This connectivity to iTOPSS will also allow the actions an EN user takes in the Ticket Portal to be processed in real time.

For example, iTOPSS can automatically check the eligibility and availability of the Ticket for assignment and make the assignment, which currently is done manually by contractor staff, taking 3-5 days to process for the Ticket assignment to show up in the portal as assigned. Under iTOPSS, this action happens in real time. The new portal shows the Ticket as assigned immediately following the EN inputting the request.

Just as the current Secure Provider Portal allows, the new Ticket Portal will continue to allow ENs to perform electronically the same important actions describe in item #2 Description of Collection, a-c and f of the current Supporting Statement for this information collection as necessary to comply with the regulatory provisions for the Ticket Program. Below we identify the aspects of this information collection processed through the Ticket Portal.

* Establishing Ticket Assignments and Ticket Use (DemoDeck.pptx slides 3 and 18-19)
* Requesting Ticket Unassignments and Notifying of VR Case Closures (DemoDeck.pptx slides 3 and 18-19)
* Tracking Progress (DemoDeck.pptx slides 5 and 9 - 10)
* Requesting EN Payment (DemoDeck.pptx slides 3 and 16-17)

Please note that when establishing Ticket assignments, we no longer require state VR agencies to submit Form SSA-1365. They now must submit all their case openings, Ticket assignments and cost reimbursement cases electronically by uploading a data file through the Ticket Portal.

The new estimates for these five collections are shown in the chart below.

ENs will continue to be able to receive various reports related to their participation in the program, such as checking to see what payments are pending for their EN or state VR agency or the status of files they have uploaded through the system (DemoDeck.pptx slides 8 and 21).

The SSA EN Ticket Portal will replace the distribution of compact dicks containing marketing information mailed to some ENs and state VR agencies. Instead, ENs will be able to request this file for download via the Ticket Portal (DemoDeck.pptx slide 24).

**Transitioning Users to the Ticket Portal**

Beginning in September, we purpose to pilot the Ticket Portalto a small number of ENs with query capability only. During this first phase of the pilot, we will not collect information through the portal. This means that the EN will not be able to request Ticket assignment and unassignment or payments through the portal. They also will not be able to respond to Timely Progress Review requests. They will only be able to view information in our records concerning their Ticket program participation, i.e., Ticket assignments they hold or previously held, payments paid or pending, and the latest contact information we have for their organization.

In November, we purpose to expand the portal capability to include functions involving some data collection and increase the number of ENs participating in the pilot. In January 2015, we purpose to fully implement the new portal with the remaining planned capabilities making it available to all ENs who meet the requirements to use it. SSA Systems will run post implementation validation through late March 2015. We will run the Secure Provider Portal and the Ticket Portal simultaneously until that time. We have already started communicating with ENs about the Ticket Portal, and training and marketing of the Ticket Portal will be ongoing.

**Change in Estimates of Public Reporting Burden**

We expect the Ticket Portal to have greater appeal and estimate its usage will increase from 50 percent of transactions to 75 percent. In addition, the respondent response time has decreased in some instances because of this change in the business process.

1. 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)  Portal | 31,141 | 1 | 1.25 | 649 |
| 20 CFR 411.140(d)(2)  Interactive Voice Recognition Telephone | 6,428 | 1 | 2.5 | 268 |

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

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| --- | --- | --- | --- | --- |
| **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 | 1,956 | 1 | 60 | 1,956 |
| 20 CFR 411.140(d)(3); 411.325(a); 411.150(b)(3); Portal | 5,868 | 1 | 10 | 978 |

Electronic data sharing via the Portal for state VR agency’s ticket assignments and cost reimbursement cases: (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) | 40,324 | 1 | 5 | 3,360 |

1. Requesting Ticket Unassignments and Notifying of VR Case Closures

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

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| --- | --- | --- | --- | --- |
| **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 | 2,494 | 1 | 15 | 624 |
| 20 CFR 411.145; 411.325  Portal | 7,481 | 1 | 11 | 1,372 |

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

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

1. 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.

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| --- | --- | --- | --- | --- |
| **Modality of Completion** | **Number of Respondents** | **Frequency of Response** | **Average Burden Per Response (minutes)** | **Estimated Total Annual Burden (hours)** |
| 20 CFR 11.192(b)&(c) | 6 | 1 | 30 | 3 |

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

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| --- | --- | --- | --- | --- |
| **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: Individuals – (Respondents fill out the Work Incentives Seminar Event {WISE} Webinar Registration Page.)

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| --- | --- | --- | --- | --- |
| **Modality of Completion** | **Number of Respondents** | **Frequency of Response** | **Average Burden Per Response (minutes)** | **Estimated Total Annual Burden (hours)** |
| 20 CFR 411.200(b); | 24,000 | 1 | 3 | 1,200 |

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

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| --- | --- | --- | --- | --- |
| **Modality of Completion** | **Number of Respondents** | **Frequency of Response** | **Average Burden Per Response (minutes)** | **Estimated Total Annual Burden (hours)** |
| 20 CFR 411.200(b);  Portal | 64,824 | 1 | 5 | 5,402 |

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.

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| --- | --- | --- | --- | --- |
| **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 |

1. Selecting a Payment System

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

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

1. 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.

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| --- | --- | --- | --- | --- |
| **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 2012 or 2013)

1. 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 other forms are required on certain types of payment claims.)

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| --- | --- | --- | --- | --- |
| **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 | 2,805 | 1 | 40 | 1,870 |
| 20 CFR 411.575;  Portal | 22,440 | 1 | 22 | 8,228 |
| 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 |

1. Periodic Outcomes Reporting

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

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| --- | --- | --- | --- | --- |
| **Modality of Completion** | **Number of Respondents** | **Frequency of Response** | **Average Burden Per Response (minutes)** | **Estimated Total Annual Burden (hours)** |
| 20 CFR 411.325(f) | 1,371 | 1 | 45 | 1,028 |

1. Dispute Resolutions

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

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| --- | --- | --- | --- | --- |
| **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 |

1. EN Contract Changes

(Private Sector – mandatory for any contract changes)

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| --- | --- | --- | --- | --- |
| **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 | 42 | 1 | 10 | 7 |
| 20 CFR 411.320; Portal | 168 | 1 | 7.5 | 21 |

ICR Summary of Burden

|  |  |  |  |  |
| --- | --- | --- | --- | --- |
|  | **Number of Respondents** | **Frequency of Response** | **Average Burden Per Response (minutes)** | **Estimated Total Annual Burden (hours)** |
| **Totals** | 360,414 |  |  | 55,833 |

**BURDEN: RESPONSES HOURS COSTS**

Previous 357,792 66,821 0

New 360,414 55,833 0

Difference -

(Change due to

Agency Discretion) 2,622 -10,988 0