

SAMHSA SOAR Web-Based Data Form

Supporting Statement

A. Justification

The Substance Abuse and Mental Health Services Administration (SAMHSA) of the U.S. Department of Health and Human Services is requesting approval from the Office of Management and Budget for a revision to the SOAR Web-Based Data Form. This Form, originally approved under OMB No. 0930-0329, expiring 10/31/2014, is designed for caseworkers to use to maintain records on applications for the Social Security Administration's (SSA) disability benefit programs, Supplemental Security Income (SSI) and Social Security Disability Insurance (SSDI). SOAR stands for SSI/SSDI Outreach, Access and Recovery and focuses on improving allowance rate on applications for these two benefit programs. Questions on the reason for denial, Medicaid/Medicare reimbursement, earnings and back payments were added to the Form. (See A. 2 and Attachment A for screen shots of the Form.)

A. 1. Circumstances of Information Collection

In 2009, SAMHSA created a Technical Assistance (TA) Center to assist in the implementation of the SOAR effort in all states. SOAR's primary objective is to improve the allowance rate for SSA disability benefits for people who are experiencing or at-risk of homelessness, and who have serious mental illness, co-occurring substance use disorders or other physical disabilities.

As communities seek to implement SOAR there is a strong emphasis on tracking the outcomes of SSI and SSDI applications submitted using the SOAR process. Communities use the outcomes of applications to conduct quality review assessments of caseworkers and to ensure the effectiveness of their programs. Many communities have been able to use their strong outcomes to argue for additional funding to support their SOAR implementation efforts. In response to requests from communities and states implementing SOAR, the SOAR TA Center under SAMHSA's direction developed a web-based data form that caseworkers can use to track the progress of submitted applications, including decisions received from the Social Security Administration (SSA) either on initial application or on appeal. Not all caseworkers use the SOAR Web-Based Data Form, so the data collected using the Form is a sampling of caseworkers tracking outcomes of their SOAR-assisted applications. SAMHSA estimates that the reporting on the SOAR Web-Based Data Form represents a sample of about 20% of cases where SOAR is used.

In addition, data from the Form can be compiled into reports on the outcome of and time to decision of SSI and SSDI applications and the use of SOAR critical components, such as the SSA-1696 Appointment of Representative, which allows SSA to communicate directly with the caseworker assisting with the application. These reports are reviewed by agency directors, SOAR State Team Leads, the national SOAR TA Center and SOAR national evaluation team to quantify the success of the effort overall and to identify areas where additional technical assistance is needed. Other federal agencies, such as the United States Interagency Council on Homelessness (USICH), have requested outcomes of the SOAR initiative, specifically total

numbers of decisions and approvals of SSA disability benefits applications submitted using SOAR. The most recent example is the USICH's request for 2013 SOAR Outcomes. A link to this annual outcome brief is posted on the SOAR website.

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 eight years (2006-2013) 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 TA Center's tasks was to simplify the tracking of application progress and decisions. To that end, the data Form was developed and is now housed on a secure server and available online. The web-based data collection Form continues to assist caseworkers in keeping track of clients' disability applications

Reports generated from the data collected assist agency directors to monitor the allowance rates of individual caseworkers and to provide technical assistance and additional training as needed. On the state and national levels, including the national evaluation of SOAR, these reports are also 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 includes three distinct sections. (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 caseworker 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, caseworkers 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 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 ALJ Hearing

For applications initiated at the Reconsideration or ALJ Hearing level, data elements include whether SOAR staff initiated the appeal, whether an expedited hearing or review on record 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.

Changes

In response to requests from users, added one question about the reason for denial, if received. SAMHSA has also added ten optional questions about Medicaid and Medicare reimbursement amounts, back payments and applicants' work involvement and earnings. These data provide important tools in local and state sustainability efforts of SOAR. If caseworkers do not have this information, they can simply leave the items blank. (See Attachment A for screen shots of the Form.)

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 is housed on the SOAR website (<https://soartrack.prainc.com>). Reports are generated and submitted electronically as part of this application. 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 TA 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 May 20, 2014 (79 FR 28936).

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 for the initial OMB approval submission.

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 TA Center’s contractor) server. Reports are available in aggregate and summary online and can also 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	700	3	2100	.25	525	\$21	\$11,025

The hour burden estimate was calculated, including the number of responses and hours per response, based on informal review of usage once the Form was launched. 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 \$43,340. Since data will be entered primarily by caseworkers, SAMHSA felt this category was the closest in the BLS data. The hourly wage for that salary is approximately \$21. It is also anticipated that caseworkers 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. Not all states use the SOAR Web-Based Data Form, so the data collected using the Form is a sampling of caseworkers tracking outcomes of their SOAR-assisted applications.

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 caseworkers do not have access to the web, they can use a variety of other methods of data tracking, such as the Homeless Management

Information System (HMIS) if it has been customized to include SOAR data elements, an Excel spreadsheet or paper forms (see B.2.) Not all states use the SOAR Web-Based Data Form, so the data collected using the Form is a sampling of caseworkers tracking outcomes of their SOAR-assisted applications.

A. 14. Estimates of Annualized Cost to the Government

If funding is continued the cost would be estimated at approximately \$50,000 annually, which would cover 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 annualized cost to the government is \$50,516 per year.

A. 15. Changes in Burden

Currently there are 7,200 hours in the OMB inventory. SAMHSA is requesting 525 hours. The decrease of 6,675 is due to an adjustment in SOAR TA Center's understanding of how the Form is used, based on the past two years of use.

A. 16. Time Schedule, Publication and Analysis Plans

It is anticipated that once OMB clearance has been approved on this revised form, data collection will continue for as long as caseworkers track applications they submit using the SOAR model. Outcome data on SOAR applications will be compiled and published annually by the SOAR TA Center under SAMHSA's guidance from reports generated from this web-based data form. Reports from the web-based data form will be used in the national evaluation of SOAR, which will be completed in October 2014. In addition, reports will be shared with the USICH to fulfill their data requests. The SOAR TA 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.