

**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 (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 supports as they work to decrease dependence on Federal cash benefits. SSA's Ticket Program transitions SSDI and 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 (VR) agencies. SSA and the ENs utilize a Ticket to Work Operations Support Manager (OSM) to operate the program and exchange information about Ticket Program participants. Through the OSM, the ENs provide updates on tasks, such as selecting a payment system or requesting payments for helping the recipient achieve certain work goals. The Ticket Program allows SSDI and SSI recipients to choose an 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 recipients 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 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 Ticket 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 in connection with a collection, it means we require information in writing with no established form). We revised many forms to make them electronically fillable and to make needed content changes (see Addendum for more detail). We also increased automation of payments to ENs. In lieu of using the forms, EN service providers, including state VR agencies, may provide the information for several of

these collections through a web-based Secure Ticket Portal. This Portal 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 offers account representatives, and a help line through our OSM to serve as an ongoing resource for any information service providers may need. If a regulation requires the EN, state VR agency, or a recipient to notify us of something in writing, such as when they want to unassign a ticket, the OSM will accept a written statement from any one of these entities making the request. The OSM will accept the written request by regular mail, fax, or email. The respondents for these collections are the ENs, and by extension, the Ticket Program 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 recipient having the ticket assigned to an EN or using it with a state VR agency, the EN may contact the OSM to find out whether the recipient is eligible to use the ticket per *20 CFR 411.140(d)(2)*. For initial requests, the EN or state VR agency may contact the OSM in one of two ways: 1) they may use the new Interactive Voice Recognition (IVR) telephone service, or 2) they may use the new Ticket Portal. Once they finish with their initial requests, ENs may also call the OSM and speak to a live person who provides them with information based on their needs. No matter which method the ENs use to obtain the eligibility report, they must provide the OSM with their Dun and Bradstreet Number as well as the recipient's SSN, and, in the case of live communication, the recipient's name.

Once the ENs establish ticket assignability, there are various ways ticket holders may use their tickets with a service provider. Each way requires the service provider, which is either an EN or a state VR agency, to send the OSM 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 OSM 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*. In addition, an EN may use the Ticket 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. In addition, an EN may use the Ticket 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 OSM 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 recipient or the service provider who wants to take a ticket out of assignment to notify the OSM. 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 OSM 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 recipients 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 recipient 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 request the recipient or the service provider 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 OSM transmits updated information to SSA so the inactive or reactivated ticket status will take effect. This information is important so the recipients do not continue their exemption status from receiving a medical CDR while the ticket is inactive, and so they regain exempt status when we reactivate the ticket.

Form SSA-1375, 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 OSM 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 holder does not respond, the OSM will seek certification from the EN or state VR agency via the Ticket Portal. Note: we resend Form SSA-1375 if the ticket holder responds with insufficient information, allowing the recipient a final opportunity to certify progress with work and earnings before an 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 OSM will decide if the ticket holder met the applicable requirements. If so, the OSM transmits the updated ticket status change and the recipient once again becomes 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 OSM 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 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 recipients, 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 OSM for verification prior to referring recipients 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 OSM 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 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, SSA-1396 allows the EN to request SSA check

its records for an indication of recipient's earnings. As an alternative, an EN may use the Ticket 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 OSM to determine a split in payment or proposing a split in payment upon which the ENs have agreed. The OSM 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 records and via the Ticket Portal.

h. Dispute Resolution

The Ticket Program provides a mechanism for dispute resolution when disputes involve recipients, the OSM, 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 OSM to recommend a dispute resolution. Sections *20 CFR 411.615* and *411.625* provide that a recipient or EN may advance a dispute resolution request to the OSM 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 Ticket Portal.

3. **Use of Information Technology to Collect the Information**

We have a secure Ticket Portal, which allows our Ticket providers to electronically complete actions and report to SSA. This Ticket Portal will eventually replace many of the current information collections described in #2 above. We estimate more than half of our providers use the Ticket Portal in 2015 to perform the majority of their actions and data sharing activities. In 2016, we expect an increase in the percentage of providers using the Ticket Portal to conduct business with SSA. Currently, we are exploring requiring all ENs to use the Ticket Portal when we update their next blank purchase agreements with SSA.

4. **Why We Cannot Use Duplicate Information**

The nature of the information we collect and the manner in which we collect it precludes duplication. SSA does not use another collection instrument to obtain similar data.

5. **Minimizing Burden on Small Respondents**

The information collections in this request will not significantly affect a substantial number of small businesses. As of April 2015, there are 671 ENs under contract with SSA, most of which are small businesses. By September of 2015 we expect at least half of the ENs to save time by submitting their information and data through the Ticket Portal.
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 recipients 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 option 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. 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 60-day advance Federal Register Notice published on September 4, 2015 at 80 FR 53608, and we received no public comments. The 30-day FRN published on November 17, 2015 at 80 FR 71908. If we receive any comments in response to this Notice, we will forward them to OMB.
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**

The chart below shows the burden hours for each of the collection instruments and statutory requirements 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

Modality of Collection	Number of Respondents	Frequency of Response	Average Burden Per Response (minutes)	Estimated Total Annual Burden (hours)
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a) 20 CFR 411.140(d)(2) – Interactive Voice Recognition Telephone	6,428	1	2.5	268
a) 20 CFR 411.140(d)(2) – Portal	25,713	1	1.25	536
a) 20 CFR 411.140(d)(3) – Virtual Job Fair Registration- Employment Networks	500	1	10	83
a) 20 CFR 411.140(d)(3); 411.325(a); 411.150(b)(3) – SSA-1365	948	1	15	237
a) 20 CFR 411.140(d)(3); 411.325(a); 411.150(b)(3) – SSA-1365 Portal	3,792	1	11	695
a) 20 CFR 411.140(d)(3); 411.325(a); 411.150(b)(3) – SSA-1370	1,956	1	60	1,956
a) 20 CFR 411.140(d)(3); 411.325(a); 411.150(b)(3) – SSA-1370 Portal	5,868	1	10	978
a) 20 CFR 411.166; 411.170(b) – Electronic File Submission	40,324	1	5	3,360
b) 20 CFR 411.145; 411.325	2,494	1	15	624
b) 20 CFR 411.145; 411.325 – Portal	7,481	1	11	1,372
b) 20 CFR 411.535(a)(1)(iii)				

– Data Sharing/Portal	8,505	1	5	709
c) 20 CFR 411.192(b)&(c)	6	1	30	3
c) 20 CFR 411.200(b) – SSA-1375	112,362	1	15	28,091
c) 20 CFR 411.200(b) – Portal	64,824	1	5	5,402
c) 20 CFR 411.210(b)	41	1	30	21
c)20 CFR 411.200(b) Wise Webinar Registration Page	24,000	1	3	1,200
c) 20 CFR 411.200(b) Virtual Job Fair Registration	9,000	1	10	1,500
d) 20 CFR 411.365; 411.505; 411.515	6	1	10	1
e) 20 CFR 411.325(d); 411.415	1*	1	480	8
f) 20 CFR 411.575 – SSA-1389; SSA-1391; SSA-1393; SSA-1396; SSA-1398; SSA-1399	2,805	1	40	1,870
f) 20 CFR 411.575 – Portal	42,075	1	22	15,427
f) 20 CFR 411.575 – Automatic Payments	11,220	1	0	0
f) 20 CFR 411.560 – SSA-1401	100	1	20	33
g) 20 CFR 411.325(f)	1,371	1	45	1,028
h) 20 CFR 411.435;				

411.615; 411.625	2	1	120	4
i) 20 CFR 411.320 – SSA- 1394	52	1	10	9
i) 20 CFR 411.320 – SSA- 1394 Portal	158	1	5	13
Totals	372,032			65,428

13. **Annual Cost to the Respondents (Other)**

There is no known cost burden to recipient 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 OSM’s contract and embeds them in their various workload processes. We estimate the cost of the OSM processing these workloads to be \$7 million.

15. **Program Changes or Adjustments to the Information Collection Request**

We decreased the burden estimate for the Request for Certification of Work and Educational Progress through the Ticket Portal. We estimate half of our providers will use the Ticket Portal in 2016, and over time, all ENs will submit their information through the Ticket Portal.

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.