

**Supporting Statement for
Work Incentives Planning and Assistance Program
OMB No. 0960-0629**

A. Justification

1. Introduction/Authoring Laws and Regulations

Section 1149 of the *Social Security Act (Act)* and section 121 of the Ticket to Work and Work Incentives Improvement Act of 1999 show the legislative authority for the Work Incentives Planning and Assistance Program. This legislation requires the Commissioner of Social Security to establish community-based work incentives planning and assistance programs that disseminate information on work incentives programs to assist persons with disabilities in their employment efforts. In response to the legislation, the Commissioner established a competitive program of cooperative agreements to provide work incentives planning, assistance, and outreach called the Work Incentives Planning and Assistance (WIPA) Program. WIPA is part of SSA's strategy for increasing the number of Social Security Disability Insurance (SSDI) and Supplemental Security Income (SSI) beneficiaries to return to work and achieve economic self-sufficiency and independence in the community. Potential awardees are State and local governments, public and private organizations, and nonprofit and for-profit organizations. Using a population based formula; Social Security has established as many WIPA project sites as needed in each state to ensure sufficient coverage of services for all SSDI and SSI beneficiaries nationally. We currently support eighty-three (83) WIPA projects. This OMB clearance request is a revision to an existing collection that has been operational since 2010.

2. Description of Collection

The awarded organizations provide information on work incentives programs, return to work related issues, and health care to Social Security claimants with disabilities (including transition-to-work aged youth) enabling them to make informed choices about work and employment. Social Security uses the information we collect to manage the program, with particular emphasis on grantee administration; beneficiary data and outcomes; training needs and grantee performance. We do not require respondents to complete the collection to obtain or maintain a specific benefit or entitlement. We estimate we complete 100 percent of the data collection electronically, i.e., we obtain the information during a personal interview with the claimant and the interviewer (WIPA certified and suitable staff) inputs the information into a database. The database is accessible via the Internet. We collect information from: a) project sites - the 83 grantee organizations with cooperative agreements to provide employment-related information, support, guidance and counseling to SSDI and SSI beneficiaries; b) community work incentives coordinators (CWICs) who serve as the contact specialists conducting on-site and remote interviews and counseling; and c) WIPA

participants who are Social Security beneficiaries with disabilities, who may be working currently, are about to work or considering a return to work. In addition, we collect data from the beneficiaries including demographic, background, employment, training, benefits, and work incentives to enable the WIPA program services to meet the needs of SSDI and SSI beneficiaries.

3. Use of Information Technology to Collect the Information

In accordance with the agency's Government Paperwork Elimination Act plan, Social Security created an Internet version of the database. We estimate we collect 100 percent of the data electronically.

4. Why We Cannot Use Duplicate Information

The nature of the information we collect and the manner in which we collect it precludes duplication. Social Security does not use another collection instrument to obtain similar data nor aggregate the data in the same way for similar purposes.

5. Minimizing Burden on Small Respondents

This collection does not significantly affect small businesses or other small entities.

6. Consequence of Not Collecting Information or Collecting it Less Frequently

Without this data collection as designed, Social Security would be unable to determine whether the WIPA services have an impact on beneficiaries' personal income and self-sufficiency, i.e., yield positive employment outcomes. Consequently, Social Security could not gather the information needed to support policy and program investment; inform the strategies and approaches leading to improved employment outcomes; and administer a successful program that meets the needs of SSDI and SSI beneficiaries without this data collection as designed.

7. Special Circumstances

There are no special circumstances that would cause SSA 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

SSA published the 60-day advance Federal Register Notice on April 27, 2016 at 81 FR 24927. We published the 30-day Notice on July 18, 2016, at 81 FR 46752. If we receive any comments on the second Notice, we will forward them to OMB. We did not consult with the public in the maintenance of this Internet database.

9. Payment or Gifts to Respondents

SSA does not provide payments or gifts to the respondents.

10. Assurances of Confidentiality

SSA protects and holds confidential the information it collects 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

The following table outlines the public reporting burden:

Modality of Completion	Number of Respondents	Frequency of Response	Average Burden per Response (minutes)	Estimated Annual Burden (hours)
Project Sites & CWICs	30,000	1	20	10,000
SSDI & SSI Beneficiaries	30,000	1	25	12,500
Help Line	30,000	1	5	2,500
Total	90,000			25,000

There are approximately 400 CWICs employed at the 83 WIPAs across the country that provide direct services to beneficiaries. The average caseload for a CWIC is 100 beneficiaries annually. For CWICs working full-time (at 1.0 FTE level), the burden per CWIC is 110 responses/year * 20 minutes/response = 37 hours/year. Because a project site's "Estimated Annual Burden" is the sum of the total number of annual responses completed by its CWICs, the burden on the 400 CWICs working for WIPAs is not listed separately in the table as it would double-count the CWIC burden.

The 13 small sites represent 16% (13/83) of the total number of project sites. The 4,800 value under "Frequency of Response" for the small sites represents 16% of the 30,000 total SSDI & SSI Beneficiaries.

The 21 medium sites represent 25% (21/83) of the total number of project sites. The 7,500 value under "Frequency of Response" for the medium sites represents 25% of the 30,000 total SSDI & SSI Beneficiaries.

The 49 large sites represent 59% (49/83) of the total number of project sites. The 17,700 value under "Frequency of Response" for the large sites represents 59% of the 30,000 total SSDI & SSI Beneficiaries.

The total burden, 25,000 hours, is based on a 17 percent reduction in the respondent burden (from 30 minutes/submission to 20 minutes/submission) listed in the original submission and reflects the Help Line completing the "Add a Beneficiary" form in ETO (5 minutes per submission). This burden reduction was the direct result of two types of modifications reflected in this request: elimination of one data collection form and compilation of two data collection forms into one. We outlined the details of these specific changes in the addendum, included as part of this request for clearance.

The total burden reflects 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

\$23 million per year for WIPA projects, training and technical assistance support, and data collection and reporting.

15. Program Changes or Adjustments to the Information Collection Request

The requested changes will streamline the forms, reduce the number of data items, consolidate data items, and greatly minimize the burden for all parties to complete the forms.

16. Plans for Publication Information Collection Results

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

17. Displaying the OMB Approval 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

Social Security does not use statistical methods for this information collection.