

**Promoting Opportunity Demonstration (POD) Project
5 CFR 1320.5(b)
OMB No. 0960-0809**

Revisions to the Collection Instruments

- **Change #1:** We are revising question D6 on our Year 1 and Year 2 Follow-Up Survey instruments, which we only ask of treatment group participants.

Current Question:

[QUESTION FOR TREATMENT GROUPS]

D6. Under POD, how do earnings affect [your/(his/her)] benefits?

[PROBE:] The substantial gainful activity (SGA) amount is about \$1,200 a month for a person who is not blind or \$2,000 a month for a person who is blind.

IF WEB: _____ (STRING 1000)
IF CATI: BENEFITS REDUCED BY \$1 FOR EVERY \$2 IN EARNINGS ABOVE A CERTAIN AMOUNT 1
IF CATI: REDUCED TO ZERO FOR EARNINGS ABOVE A CERTAIN AMOUNT 2
IF CATI: NEVER REDUCED FOR ANY EARNINGS AMOUNT 3
IF CATI: OTHER (SPECIFY) _____ (STRING 1000).....99
Don't know d
REFUSED.....r

Revised Question:

[QUESTION FOR TREATMENT GROUPS]

D6. Under POD rules, are [your/(his/her)] benefits reduced at any time if [your/(his/her)] monthly earnings are above a level that SSA set for POD?

PROBE: The monthly earnings level that SSA set for POD is the higher of the following: (1) \$850 in 2018 called the POD earnings threshold, or (2) your total monthly itemized Impairment-Related Work Expenses (IRWEs) if that amount is greater than \$850.

YES

NO

DON'T KNOW

REFUSED

Justification #1: We modified the D6 question to correspond more closely to the question in D5, which is asked of control group members. We believe the revised question will provide a better assessment of the treatment group's understanding of the POD rules using a more discrete set of responses that create better comparability to the control group's questions about current rules. We do not anticipate this revision will change the burden estimate for this question.

- **Change #2:** We are adding three questions to the Year 1 and Year 2 Follow-Up Survey instruments related to impairment-related work expenses. We expect to field the Year 1 Follow Up Survey beginning in February 2019.

We are adding the following questions to the Follow Up Surveys:

- C16.** The next questions are about any expenses [you/[FIRST NAME]] may have had for services or other support related to [your/(his/her)] condition that [you need/(he/she) needs] in order to work.
In the past month, did [you/[FIRST NAME]] have any of the following expenses related to [your/(his/her)] condition that help [you/(him/her)] to work?

a. Transportation costs, such as vehicle modifications or paratransit

b. Attendant care costs, such as services performed to help prepare for work

c. Medical exam or prescription drug costs

d. Physical device costs, such as wheelchairs, dialysis equipment, or pacemakers

e. Residential modification costs, such as exterior ramps, railings, pathways, or enlarging a

[Empty box]

doorway

f. Other costs?

(SPECIFY) _____

IF C16A, C16B, C16C, C16D, C16E, OR C16F = 1
REPEAT FOR EACH YES AT C16

C17. In the past month, how much did [you/[FIRST NAME]] spend on expenses for [FILL SERVICE FROM C16]?

\$ |__| , |__|__|__| . |__|__| AMOUNT
(0-9,999.99)

DON'T KNOW.....d
REFUSED.....r

GO TO C17 FOR NEXT EXPENSE OR D1 IF NO OTHER EXPENSES

IF C17 = DON'T KNOW OR REFUSED, ASK

C18. Was it ...

- Less than \$100,.....1
- Between \$100 and \$199,.....2
- Between \$200 and \$299, or.....3
- \$300 or more?.....4
- DON'T KNOWd
- REFUSED.....r

Justification #2: These questions will provide additional information about the impacts of the POD new rules on beneficiary expenses related to work. We developed these questions in response to a question from OMB about how we plan to identify the effects of POD on work related expenses. Specifically, we reviewed the available information in SSA administrative data and determined there was not enough data to address the potential effects of the POD new rules on expenses, in part because the new rules change the treatment of impairment

related work expenses (IRWEs). We do not anticipate that the addition of these three questions will significantly affect the overall cost for the project, as they are only answered, if necessary, by a subset of the overall population for the survey.

- **Change #3:** We are modifying the paper and online end of year reconciliation (EOYR) data collection instruments. We are making the following changes to the EOYR:
 - For years when participation in the POD project does not span the entire calendar year, we are requesting pre-POD and post-POD earnings documentation;
 - We are no longer requesting confirmation from beneficiaries who earned less than the POD monthly threshold throughout a calendar year;
 - We no longer need a separate online EOYR form. Rather, we will streamline the process of electronically reporting this documentation using the existing online Monthly Earnings and IRWE Reporting form;
 - In an effort to simplify the EOYR process for participants, we also generally revised the form’s language and instructions to better match the monthly reporting form as much as possible.

Justification #3: We are adding the collection of pre-POD and post-POD earnings to the data collection instrument because we identified a need for this documentation in the EOYR process as we continue develop the POD policies and data system. Submission of the paid wages documentation from before or after the POD participation period will prevent erroneous benefit payments. In the EOYR, we will deduct earnings outside of the POD period from SSA’s Master Earnings File records prior to recalculation of offset. Pre-POD earnings documentation (step 1 on the revised instrument) will help accurately calculate benefits for participants in POD in the month(s) in 2018 prior to when they were randomly assigned into a POD treatment group and post-POD earnings documentation (step 4 on the revised instrument) will help accurately calculate benefits in the month(s) after active participation in POD ends.

- **Change #4:** We are updating the burden for the Year 1 and Year 2 Follow-Up Survey instruments, and for the EOYR information collection due to the revisions we are making to the form and the process (as listed in Change #2 above). The following chart shows the updated burden information for this collection:

Modality of Completion	Number of Respondents	Frequency of Response	Number of Responses	Average Burden Per Response (minutes)	Estimated Total Annual Burden (hours)
Informed Consent Form	16,500	1	16,500	10	2,750
Baseline	16,500	1	16,500	20	5,500

Survey					
12-Month Follow Up Survey	6,000	1	6,000	32	3,200
24-Month Follow Up Survey	12,000	1	12,000	27	5,400
Interviews with Site Staff	40	4	160	66	176
Onsite Audit of Sample of Case Files	8	2	16	20	5
Semi-Structured Interviews with Treatment Group Subjects	144	1	144	60	144
Monthly Earnings and Impairment-Related Expenses Reporting Form (Paper)	1,820	12	21,840	10	3,640
Monthly Earnings and Impairment-Related Expenses Reporting Form (Internet)	780	12	9,360	5	780
End of Year Reporting Documentation	2,615	1	2,615	8	349
Totals	56,407		85,135		21,944

Justification #4: We anticipate the additional questions we are adding to the Follow-Up Surveys will increase the burden for these surveys by about 4 minutes total (per survey). We created this estimate based on usability testing with 9 participants who took approximately 1 minute per question. We rounded up our estimate, as the small sample size for the testing does not account for the greater number of respondents for the survey. We will submit a Change Request to update this estimate if it proves inaccurate once we field the questions in the survey.

In addition, the revisions we are making to the EOYR process required us to reevaluate the time estimates for the process. Since we are removing the electronic version (as we will use data from the IRWE electronic collections instead), and we revised the amount of requested information on the form, we needed to adjust the burden to accommodate these revisions.

Finally, the overall decrease in the initial estimated number of volunteers for POD from 15,000 to 10,000 also created an overall decrease in the burden for this project. While we initially anticipated a higher volume of volunteers, we believe the lower volume is still sufficient to our needs for the evaluation of this project.

We will implement these revisions to the POD surveys and EOYR form upon OMB approval. We intend to implement the revised Year 1 and Year 2 survey with the additional questions in February 2019 and 2020. We will make the previous version obsolete and only field the revised version with the three newly added questions. We intend to implement the revised EOYR form in early 2019 to allow us to conclude our 2018 year-end results before August 2019 (as mentioned below).

Justification for Resubmission of the Collection within One Year of OMB Approval

We request these changes now so that we can implement the revised instruments with POD participants prior to fielding the Year 1 Follow Up Survey in February 2019. We cannot wait until the PRA renewal time, as the Year 1 Follow Up Survey is set to be fielded starting in 2019.

In addition, we are making these revisions based on a question from OMB that sparked the need to add these additional questions to the survey. The question required time for the contractor to review the SSA administrative data and make a determination that there was not enough data to address the potential effects of the POD new rules on expenses, in part because the new rules change the treatment of IRWEs.

In consultation with the evaluation contractor, we identified a strategy to assess the effects of the new POD rules on work related expenses through the survey at minimal burden. The evaluation contractor tested the three questions while conducting a pretest of the full survey, and estimated the average burden for administering the 3 new questions was 4 minutes. We used that data in the updated burden chart above (as well as in the updated burden chart we included in the Supporting Statement).

In addition, we are requesting the changes to the EOYR process now so that we can collect documentation of pre-POD and post-POD earnings to ensure we calculate the 2018 benefits correctly for participants in POD. We intend to send the form in early 2019 to all POD participants. We cannot wait until the PRA renewal time, as we need the documentation in 2019 to include it in the 2018 reconciliation scheduled for August 2019.

