

**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 people 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 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-two WIPA projects.

**2. Description of Collection**

As part of SSA's strategy to assist SSDI beneficiaries and SSI recipients who wish to return to work and achieve self-sufficiency, SSA established the WIPA program. This community based, work incentive, planning and assistance project collects identifying claimant information via project sites and community work incentives coordinators (CWIC). SSA uses this information to ensure proper management of the project, with particular emphasis on administration, budgeting, and training. In addition, project sites and CWIC's collect data from SSDI beneficiaries and SSI recipients on background employment, training, benefits, and work incentives. SSA is interested in identifying SSDI beneficiary and SSI recipient outcomes under the WIPA program, to determine the extent to which beneficiaries with disabilities and SSI recipients achieve their employment, financial, and healthcare goals. Form SSA-4567 (Help Line referral form) is the vehicle the Ticket to Work Help Line (Help Line) uses to alert the WIPA project a beneficiary requires WIPA services. The Help Line Call Center Representative (CSR) completes the form with information the beneficiary provides and some information from our systems, and emails the form via encrypted email to a secure mailbox at the WIPA site. The WIPA staff uses the information to contact the beneficiary and determine if the individual is eligible for services; if so, the WIPA staff uses Form SSA-4565 (intake form) to collect information not

available on the Help Line referral. In some circumstances, the referral for services comes from another source, if so; the CWIC may complete Form SSA-4565 when they first contact the beneficiary. SSA uses Form SSA-4566 (case notes form) to keep files up to date, recording subsequent contacts with the beneficiary, or with service providers on the beneficiary's behalf. We do not collect this information for data analysis; the WIPA project staff uses it to document their services. We may review files containing the forms when we conduct on-site reviews, but normally, the WIPA project staff either store the information on SSA-provided encrypted storage devices, or in hard copy in a locked file cabinet for later reference. The respondents are SSDI beneficiaries; SSI recipients; community project sites; and employment advisors.

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

Due to budget constraints, we are removing the electronic version of WIPA and replacing it with Forms SSA-4565 (WIPA Intake Information); SSA-4566 (WIPA Case Note); and SSA-4567 (Help Line WIPA Referral) to collect the information we were collecting through the electronic version. SSA is suspending the electronic versions of WIPA, because SSA needs to reduce its use of administrative funds for the WIPA program. Rather than allow one contract to endure most of the cuts with severe effects, SSA made reductions to two contracts funded with administrative funds: (1) the Ticket Program Manager (TPM) contract; and (2) the WIPA Training and Technical Assistance contract. SSA will reduce the WIPA Training and Technical Assistance contract to only the essentials we need to provide training and technical assistance to the WIPA projects so we can continue to provide benefits planning services to beneficiaries. In the future, if we are able to increase funding for this program again, we will reinstitute the electronic versions.

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**

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

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

If we did not collect this data, SSA 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). In addition, SSA would be unable to 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. Because we collect the information on an as needed basis, we cannot collect it less

frequently.

**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**

The 60-day advance Federal Register Notice published on July 18, 2019 at 84 FR 34469, and we received no public comments. The 30-day FRN published on October 7, 2019 at 84 FR 53551. If we receive any comments in response to this 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**

<b>Modality of Completion</b>	<b>Number of Respondents</b>	<b>Frequency of Response</b>	<b>Average Burden per Response (minutes)</b>	<b>Estimated Total Annual Burden (hours)</b>	<b>Average Theoretical Hourly Cost Amount (dollars)*</b>	<b>Total Annual Opportunity Cost (dollars)**</b>
<b>Small Site (Under 150 beneficiaries served) (SSA-4565, SSA-4566)</b>	4,800	1	20	1,600	\$10.22*	\$16,352**
<b>Medium Site (150-599 beneficiaries served) (SSA-4565, SSA-4566)</b>	7,500	1	20	2,500	\$10.22*	\$25,550**

<b>Large Site (600 or more beneficiaries served) (SSA-4565, SSA-4566)</b>	17,700	1	20	5,900	\$10.22*	\$60,298**
<b>Total Sites</b>	<b>30,000</b>			<b>10,000</b>		
<b>SSDI &amp; SSI Beneficiaries</b>	30,000	1	25	12,500	\$10.22*	\$127,750**
<b>Help Line (SSA-4567)</b>	30,000	1	5	2,500	\$10.22*	\$25,550**
<b>Totals</b>	<b>90,000</b>			<b>25,000</b>		<b>\$255,500**</b>

\*We based this figure on average DI payments, as reported in SSA’s disability insurance payment data.

\*\* This figure does not represent actual costs that SSA is imposing on recipients of Social Security payments to complete this application; rather, these are theoretical opportunity costs for the additional time respondents will spend to complete the application. **There is no actual charge to respondents to complete the application.**

The total burden for this ICR is **25,000** burden hours (reflecting SSA management information data), which results in an associated theoretical (not actual) opportunity cost financial burden of **\$255,500**. SSA does not charge respondents to complete our applications.

**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**

The annual cost to the Federal Government is approximately \$23,000,000. This estimate accounts for costs from the following areas: (1) designing, printing, and distributing the form; and (2) SSA employee (e.g., field office, 800 number, DDS staff) information collection and processing time.

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

There are no changes to the public reporting burden; however, due to changes in our internal accounting process, we are changing the way we report the information. Previously, we reported all project sites under one information collection (IC); but now, for better accounting, we are reporting them by size of the site. While this does not actually cause a burden change, it makes it easier for SSA to track the number of respondents per cite. In addition, we are replacing electronic versions of WIPA with paper Forms SSA-4565 (WIPA Intake Information); SSA-4566 (WIPA Case Note); and SSA-4567 (Help Line WIPA

Referral) to collect the information we were collecting through the electronic version. Since it takes the same amount of time for respondents to use the electronic versions as it does the paper versions, there are no changes to the public reporting burden for this change.

16. **Plans for Publication Information Collection Results**

SSA will not publish the results of the information collection.

17. **Displaying the OMB Approval Expiration Date**

OMB granted SSA an exemption from the requirement to print the OMB expiration date on its program forms. SSA produces millions of public-use forms with life cycles exceeding those of an OMB approval. Since SSA does not periodically revise and reprint its public-use forms (e.g., on an annual basis), OMB granted this exemption so SSA would not have to destroy stocks of otherwise useable forms with expired OMB approval dates, avoiding Government waste.

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**

SSA does not use statistical methods for this information collection.