

Supporting Statement for Ohio Direct Referral Demonstration (ODRD)
OMB No. 0960-NEW

A. Justification

1. Introduction/Authoring Laws and Regulations

The Social Security Administration (SSA) is requesting clearance to collect data necessary to conduct a random assignment evaluation of volunteers in Ohio who enroll in Ohio Direct Referral Demonstration (ODRD).

Since 1980, Congress authorized SSA to conduct demonstration and research projects to test the effectiveness of possible program changes that could encourage individuals to work and decrease their dependence on disability benefits. In fostering work efforts, we intend this research, and the program changes we evaluate, to produce savings in the trust fund or improve program administration. *Section 1110* of the *Social Security Act (Act)* authorizes SSA to conduct research and evaluation projects that waive Title 16 policy. *Section 234* of the *Act* authorizes SSA to conduct research and evaluation projects that waive Title 2 policy. Both of these authorities require informed, written consent for participation in demonstrations.

When Congress passed the *Ticket to Work and Work Incentives Improvement Act of 1999 (Public Law 106-170)*, they explicitly removed SSA's authority to refer beneficiaries to state vocation rehabilitation (VR) agencies so as to avoid any apparent preference to those agencies over the new employment networks created by the Ticket to Work program. Since then, Congress and others have shown interest in ways for SSA to facilitate the receipt of VR services, especially for transition-age youth who are not eligible for the Ticket program. (See <https://www.gao.gov/products/GAO-17-485>.)

SSA and Opportunities for Ohioans with Disabilities' (OOD) will conduct the ODRD to test the effectiveness of providing direct referrals to vocational rehabilitation services for 18 and 19 year-olds who are, or may become, Supplemental Security Income (SSI) or Social Security Disability Insurance (SSDI) recipients. The participants in the demonstration will be individuals ages 18 and 19 at the time of enrollment, who are either (1) applying for SSDI or SSI or (2) undergoing an age-18 redetermination of SSI eligibility. The ODRD is a joint effort by SSA and OOD's Division of Disability Determination (DDD), and Ohio's Bureau of Vocational Rehabilitation (BVR). Each agency will contribute its own staff time to the demonstration, and SSA will not incur additional costs.

ODRD builds off other work by SSA exploring ways to improve the adult employment outcomes and financial independence for SSI recipients and SSI and SSDI applicants who are in the process of transitioning to adulthood. The ODRD incorporates lessons learned from SSA's Youth Transition Demonstration (OMB # 0960-0687, discontinued) and the Promoting Readiness of Minors in SSI (PROMISE) demonstration (0960-0799). ODRD tests the effects of a direct referral to vocational

rehabilitation services for individuals aged 18 or 19 who are in the process of applying for, or undergoing an evaluation to, retain SSDI benefits or SSI payments.

Because SSA does not have the authority to provide vocational rehabilitation agencies the information with which they can contact SSDI or SSI beneficiaries, we will be using our demonstration authorities (*Sections 234 and 1110 of the Act*) to waive this rule. We are conducting the demonstration for research purposes. The demonstration will benefit SSA because we will learn about the effectiveness of providing direct referrals to vocational rehabilitation programs as a method of intervention for transition-aged adults who allege disabilities. This strategy may lead to decreased reliance on SSA's disability programs, thereby potentially producing long-term cost savings for the agency. SSA staff will use SSA and BVR program data to evaluate the demonstration project.

2. Description of Collection

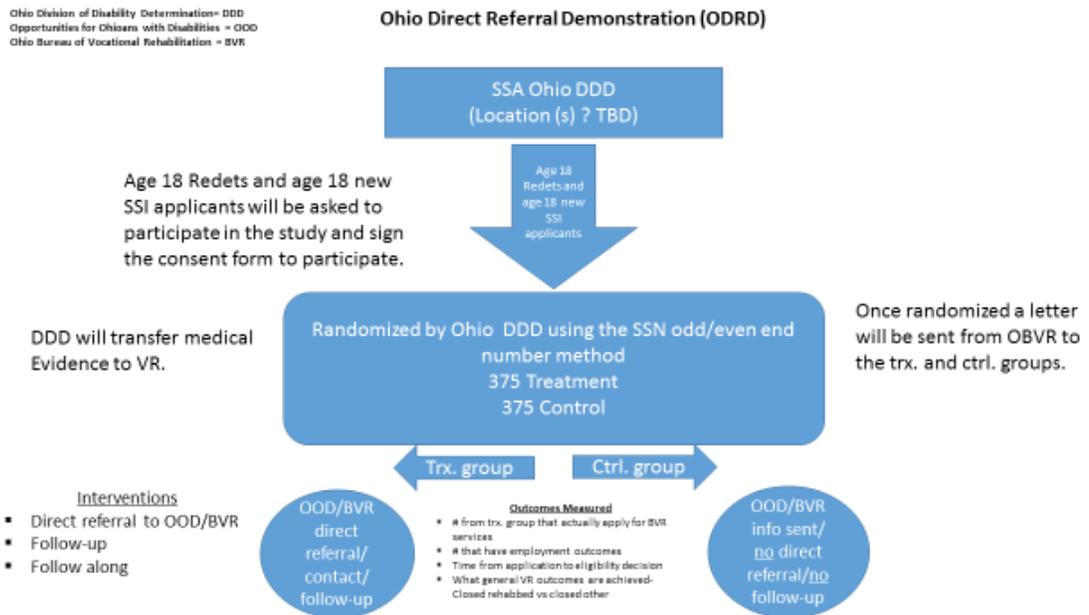
SSA is seeking OMB clearance for the data collection related to enrollment and evaluation of the ODRD. Using SSA claims records, which DDD will access to perform disability determinations for SSA, DDD will attempt to recruit at least 750 participants.

As required under SSA's demonstration authority, DDD will obtain signed, informed consent from individuals who want to participate in the demonstration. Recruitment for the ODRD will require two forms: (1) a new Invitation to Participate and Consent form, and (2) Form SSA-3288, Consent for Release of Information (OMB # 0960-0566). DDD will send the new Invitation to Participate and Consent form to young adult disability recipients and applicants to see if they are interested in participating in the demonstration. The ODRD Invitation to Participate and Consent forms will meet the informed consent requirements in the Social Security Act and SSA regulations. Specifically, they include language explaining the study as well as potential benefits and harms.

In addition, we will also send the SSA-3288, Consent for Release of Information (0960-0566), which SSA currently uses to authorize release of information to third parties. For the ODRD, Form SSA-3288 will identify BVR as the third party to whom DDD will disclose contact information (name, address, telephone number); other identifying information (date of birth and SSN); and complete medical records for the participants.

Furthermore, the BVR application for vocational rehabilitation services already provides consent to release information to SSA for research purposes. We expect participants will complete the BVR application separately once DDD refers them to the BVR. SSA will use administrative records systems and BVR data to evaluate the effect of the demonstration. This is a onetime collection of information, and there are no surveys or additional data collections for the ODRD. See Figure 1 below, which shows the study design.

Fig. 1: ODRD Study Design



Finally, this collection is voluntary, and participation in this demonstration will have no impact on respondents' disability benefits or SSI payments. In addition, participation in the ODRD is revocable at any time. SSA and OOD will remove participants who revoke consent from the demonstration. Upon notification of revocation of participation, SSA and OOD will no longer use, transmit, or request information about the participant who revoked participation in any ODRD data exchange or analysis. Participation in the ODRD will have no effect on DDD's usual process for deciding eligibility for SSI payments or SSDI benefits.

The respondents are individuals aged 18 or 19 who are in the process of applying for, or undergoing an evaluation, to obtain or retain SSDI benefits or SSI payments.

3. Use of Information Technology to Collect the Information

We will send paper forms and consents to potential participants for this evaluation. SSA did not create an electronic version of the Invitation and Consent form under the agency's Government Paperwork Elimination Act (GPEA) plan because we will only recruit 750 individuals for this demonstration.

For Form SSA-3288, Consent for Release of Information, the DDD will send a paper copy of that for completion and signature for participants to consent to disclosure of contact information (name, address, telephone number); other identifying information (date of birth and SSN); and complete medical records to BVR. The SSA-3288 is available in a print-only PDF on SSA's website. We discuss the SSA-3288 further under OMB # 0960-0566.

The DDD will send mail to potential participants to conduct recruitment, and will not

interview them. We will require all DDD staff responsible for the implementation of the recruitment and enrollment process to participate in Protecting Human Research Participants Training offered by the National Institutes of Health.

4. Why We Cannot Use Duplicate Information

The ODRD is not asking duplicative information. We are recruiting individuals for a demonstration that will test the impact of a direct referral to Vocational Rehabilitation Services. The information we will collect is a consent to participate. The nature of the information we are collecting and the manner in which we are collecting it preclude duplication. SSA does not use another ODRD consent form. All data used in the evaluation will come from existing state or SSA administrative records.

SSA discusses use of the SSA-3288 under OMB # 0960-0566.

5. Minimizing Burden on Small Respondents

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

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

If we did not use the Invitation to Participate and Consent form, and Form SSA-3288, Consent for Release of Information form; SSA would not be able to recruit for the ODRD. Since we only collect this information once per participant, we cannot collect it less frequently. There are no technical or legal obstacles to burden reduction.

7. Special Circumstances

There are no special circumstances with this collection 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

Under *sections 234 and 1110 of the Act*, we must publish a notice describing each experiment or demonstration project in the Federal Register before we place each experiment or project in operation. SSA will publish this notice before recruitment begins.

SSA conducted usability testing for the Invitation to Participate and Consent Form with nine individuals between the ages of 18-19 to assess burden estimates for the form.

For the Invitation to Participate and Consent form, SSA published the 60-day advance Federal Register Notice on September 12, 2019 at 84 FR 48204, and we did not receive any public comments in response to this notice. We published the 30-day Federal Register Notice on November 20, 2019 at 64177. If we receive any comments in response to the 30-day Notice, we will forward them to OMB. We did not consult with the public in the maintenance of this collection.

9. Payment or Gifts to Respondents

SSA will not be providing incentives or payments for participation in the ODRD.

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

We estimate it will take 750 recruited respondents approximately 6 minutes on average to complete the Invitation to Participate and Consent Form.

Modality of Completion	Number of Respondents	Frequency of Response	Average Burden per Response (minutes)	Estimated Total Annual Burden (hours)	Average Theoretical Hourly Cost Amount (dollars)*	Total Annual Opportunity Cost (dollars)**
Invitation to Participate and Consent Form – Participant Only (no Representative Payee)	645	1	6	65	\$8.55*	\$556**
Invitation to Participate and Consent Form – Representative Payee (on behalf of the Participant)	105	1	6	11	\$33.50*	\$369**
Totals	750			76		925**

* We based this figure on average U.S. minimum wage (for the participants ages 18-19 who may be working); and the average family income in Ohio (for the Representative Payees).

** 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 **76 hours**. We based this figure on the usability testing we mentioned above in #8. This burden hour figure results in an associated theoretical (not actual) opportunity cost financial burden of **\$925.00**. SSA does not charge respondents to complete our applications.

We calculated the burden for the SSA-3288 under OMB # 0960-0566. We adjusted the burden for the SSA-3288 for the ODRD.

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 \$30,031. This estimate is a projection of the cost for Federal employees to evaluate this demonstration project based on the evidence the ODD collects over the duration of the ODRD project. To estimate this cost, we considered time for pulling the data, conducting the analysis, and writing up the results.

There is no cost to the Federal government to print or process this form. The ODD will print, mail out, and process the form. SSA will not reimburse them, so there is no cost to the agency, or the Federal government for the form.

15. Program Changes or Adjustments to the Information Collection Request

This new information collection increases the public reporting burden. See #12 for the burden figures.

16. Plans for Publication Information Collection Results

Recruitment and enrollment for the ODRD will begin in January 2020 and end in December 2020. The ODD will complete the recruitment and enrollment phase using the Invitation to Participate and Consent Form, and Form SSA-3288 (0960-0566). SSA staff will complete the analysis and evaluation for the ODRD based on the data the ODD collects over the course of the demonstration project. SSA will not collect any additional information. SSA may publish a paper after we complete the analysis. We anticipate completing the analysis by 2022.

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).