

**Justification for Non-Substantive Changes Form SSA-199
Vocational Rehabilitation Provider Claim
20 CFR 404.2101(a); 404.2108(b); 404.2117(c)(1)&(2); 404.2121(a); 416.2208(b);
416.2217(c)(1)&(2); 416.2201(a); and 416.2221(a)
OMB No. 0960-0310**

Justification for Non-Substantive Changes to the Collection or Resubmission of the Collection within One Year of OMB Approval

We are re-adding a formula cost worksheet to the Vocational Rehabilitation (VR) Provider Claim clearance package. The Social Security Administration (SSA) uses the cost formula sheet to identify the monthly dollar amount per client for which SSA will reimburse a VR agency for every month of the beneficiary's VR payment period. The cost formula determines the monthly tracking costs as well as the Administrative, Counseling, and Placement (ACP) costs, also known as indirect cost. For purposes of the cost formula, ACP costs follow the federal fiscal year(s) (October 1 - September 30) in which these costs are incurred. A State VR agency must have an approved cost formula for the corresponding federal fiscal year before SSA can process the associated claims. Once approved, SSA will use the new formula amounts to compute ACP and Tracking costs. SSA computes the cost formula based on expenditures in the preceding federal fiscal year, which comes from the VR's RSA-2 and RSA-911.

We are making changes within a year of the OMB approval date, because we inadvertently forgot to include this document in the previously approved OMB approved clearance package. For previous renewals, we included this cost formula worksheet as an optional worksheet for the VR agencies to use when updating their cost formula. Because the VR agencies expect to use the updated FY2020 version, we are unable to wait until the next renewal cycle to include this worksheet. If the VR agencies do not have the worksheet, it could cause and issue, keeping SSA from reimbursing any VR agencies who prefer to use the worksheet for administrative cost the incurred working with our beneficiaries.

We will we implement this updated worksheet upon OMB's approval.