

Supporting Statement
Request for Accommodation in Communication Method
Form SSA-9000-F6
45 CFR 85.51
OMB No. 0960-0777

A. Justification

1. Introduction/Authoring Laws and Regulations

In *American Council of the Blind, et al v. Michael Astrue and Social Security Administration*, the U.S. District Court for the Northern District of California ordered the Social Security Administration (SSA) to give blind or visually impaired Social Security applicants, beneficiaries, recipients, and representative payees the opportunity to elect one of five alternative formats to receive notices about program benefits. SSA expanded the options, and now offers seven alternative notice options. SSA developed Form SSA-9000-F6, Request for Accommodation, to gather information from blind or visually impaired individuals about why they require a particular accommodation, other than the accommodations already offered to communicate effectively with SSA. Section 504 of the *Rehabilitation Act of 1973 (Section 504)* states that no otherwise qualified disabled individual shall, solely because of his or her disability, be excluded from the participation in; be denied the benefits of; or be subjected to discrimination under any program or activity conducted by any Executive agency. This law is codified in 29 USC 794 (2010) of the *United States Code*. Under Section 504 of the *Rehabilitation Act of 1973*, individuals with disabilities have the right to request an accommodation of their choice. Section 504 requires SSA to take appropriate steps to ensure effective communication and meaningful access for these individuals, and to furnish appropriate auxiliary aids or services where necessary to afford individuals with disabilities equal opportunities to participate in, and enjoy the benefits of, a program or activity conducted by the agency. An individual with a disability can request an accommodation to communicate effectively with the agency or to gain meaningful access to programs and services.

2. Description of Collection

SSA allows disabled or impaired Social Security applicants, beneficiaries, recipients, and representative payees to choose one of seven alternative methods of communication they want SSA to use when we send them benefit notices and other related communications. The seven alternative methods we offer are: (1) standard print notice by first-class mail; (2) standard print mail with a follow-up telephone call; (3) certified mail; (4) Braille; (5) Microsoft Word file on data CD; (6) large print (18-point font); or (7) audio CD. However, respondents who want to receive notices from SSA through a communication method other than the seven methods listed above must explain their request to us. Those respondents use Form SSA-9000 to: (1) describe the type of accommodation they want; (2) disclose their condition necessitating the need for a different type of accommodation; and (3) explain why none of the seven methods described above are sufficient for their needs. SSA uses Form SSA-9000 to determine, based on applicable law and regulation, whether to grant the respondents' requests for an

accommodation based on their impairment or disability. SSA collects this information electronically through either an in-person interview or a telephone interview during which the SSA employee keys in the information on our iAccommodate Intranet screens. The respondents are disabled or impaired Social Security applicants, beneficiaries, recipients, and representative payees who ask SSA to send notices and other communications in an alternative method besides the seven modalities we currently offer.

3. Use of Information Technology to Collect the Information

In accordance with the agency's Government Paperwork Elimination Act plan, SSA created an Intranet version of Form SSA-9000-F6. Based on our data, we estimate approximately 100% of respondents under this OMB number use the electronic version. While we retain a paper form in case SSA's systems are down, we rarely use it.

4. Why We Cannot Use Duplicate Information

The nature of the information we collect and the manner in which we collect it preclude duplication. SSA does not use another collection instrument to obtain similar data.

5. Minimizing Burden on Small Respondents

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

6. Consequences of Not Conducting Information or Collecting it Less Frequently

If we did not use Form SSA-9000-F6, SSA would have no adequate means of determining whether to grant an individual's request for an additional or alternative notice format. Because we collect the information on an as needed basis, we cannot collect it less frequently. There are no technical or legal obstacles to burden reduction.

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 3, 2019, at 84 FR31972, and we received no public comments. The 30-day FRN published on September 16, 2019 at 48694. If we receive any comments in response to this Notice, we will forward them to OMB.

9. Payment or Gifts to the 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 Questions of a Sensitive Nature

The information collection does not contain any questions of a sensitive nature.

12. Estimates of Public Reporting Burden

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)**
SSA-9000/ iAccommodate	5,000	1	20	1,667	\$10.22*	\$51,100**

* 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 **1,667** hours (reflecting SSA management information data), which results in an associated theoretical (not actual) opportunity cost financial burden of **\$51,100**. 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 on the respondents.

14. Cost to the Federal Government

The annual cost to the Federal Government for this collection is approximately \$60,000. This estimate accounts for costs from the following areas: (1) designing, printing, and distributing the form; (2) SSA employee (e.g., field office, 800 number, DDS staff) information collection and processing time; and (3) systems development, updating, and maintenance costs.

15. Changes to the Public Reporting Burden

There are no changes to the public reporting burden.

16. Publication of the Results of the Information Collection

SSA will not publish the results of the information collection.

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

SSA is not requesting an exception to the requirement to display the OMB approval

expiration date.

For the **paper Form SSA-9000-F6**, we will not publish 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. OMB Certification Requirements

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 will not use statistical methods for this information collection.