

**Supporting Statements Part A for SSA Work Disability Functional Assessment Battery  
(WD-FAB) Data Collection  
OMB No. 0960-NEW**

**A. Justification**

**1. Introduction/Authoring Laws and Regulations**

The Social Security Administration (SSA) uses continuing disability reviews (CDR) to determine continued eligibility of program benefits for Social Security disability insurance (SSDI), and Supplemental Security Income (SSI) recipients. Medical diary designations based on the likelihood of medical improvement determine when beneficiaries undergo a CDR. Beneficiaries with a designation of medical improvement not expected (MINE) typically receive a CDR of 5 to 7 years after the most recent disability determination. Those classified as medical improvement possible (MIP) receive a review every 3 years. SSA reviews beneficiaries designated as medical improvement expected (MIE) every 6 to 18 months. SSA is requesting clearance to administer the Work-Disability Functional Assessment Battery (WD-FAB) data collection to a sample of working-age SSDI and SSI program recipients who are due for their CDRs. The WD-FAB is a self-reported assessment measuring whole person-functioning at the activity level for eight work-related functional domains: (1) Basic Mobility; (2) Upper Body Function; (3) Fine Motor Function; (4) Community Mobility; (5) Communication and Cognition; (6) Resilience and Sociability; (7) Self-Regulation; and (8) Mood and Emotion (Jette et. al., 2019). Section 1110(a) of the Social Security Act (Act) gives the Commissioner of Social Security the authority to help fund research or demonstration projects relating to the prevention and reduction of dependency. SSA contracted with Westat to conduct the WD-FAB data collection.

**2. Description of Data Collection**

To assess the feasibility of incorporating the WD-FAB into the CDR process, which focuses on evaluation over time, this study will conduct two assessments. The first assessment is a baseline assessment of the WD-FAB, and the second assessment, which we will conduct with the same individuals six months later, will detect any changes. Each survey will include three main components: classification questions, WD-FAB questions, and follow-up questions. The classification questions and WD-FAB questions will be identical in each survey. Survey 1 will cover questions in the following domains:

- Classification questions:
  - Demographic questions (age, gender, race, ethnicity, marital status, highest level of education completed);
  - Questions on general health, mental health status, and work-limiting conditions;
  - 4-item set of Healthy Days core questions included in the state-based Behavioral Risk Factor Surveillance System;
  - Questions from Form SSA-455;

- Veterans Item Health Survey;
- Items from WD-FAB; and
- 3-5 follow-up questions to solicit feedback on the WD-FAB about ease of use, clarity of instructions, and perceived burden.

Survey 2 will include the same classification questions included in Survey 1, and we will record responses using the WD-FAB Computer Assisted Telephone (CAT) system. CAT interviewers and respondents who complete the surveys via the web will access the same web version of the survey instruments ensuring data consistency between these two modes of data collection. The CAT methodology uses a computer interface that rapidly tailors questions to the unique ability level of each claimant, allowing the system to administer fewer items, while providing an assessment that is proven to be accurate, precise, comprehensive, and efficient (Meterko, Marfeo, et al. 2015). Follow-up questions for Survey 2 will include 52 effort and symptom validity questions to examine endorsement of certain symptoms related to function.

Data collection for Survey 1 will begin in November 2021 and extend for 12 weeks through January 2022. The target goal for Survey 1 is to obtain 2,400 completed surveys from the participant pool of at least 4,000 beneficiaries. Data collection for Survey 2 will begin in April 2022, approximately 6 months after Survey 1, and continue for 3 months through June 2022. For Survey 2, we will initiate contact with the 2,400 beneficiaries who complete Survey 1. The target goal for Survey 2 is to obtain 1,600 completed surveys. SSA will use the data the WD-FAB collects to assess the feasibility and value of incorporating the WD-FAB into SSA's CDR process with the intent of improving the CDR process.

### **Recruitment**

Participant recruitment will include multiple modes of contact. We will initiate contact by mailing a study invitation package. The study invitation package will include the following items:

1. An invitation letter explaining the study and notifying selected recipients that we will call them soon;
2. A study consent form explaining the background of the study, what will happen during the study, the risks and benefits associated with participating, and their rights as a study participant; and
3. Instructions to download the study smartphone app to facilitate study participation.

Following the mailing of the study invitation package, we will call recipients to conduct a short screener to ensure we are speaking to the sampled recipient and confirm that the recipient is eligible for the study. Eligibility criteria include a

required age of 18 or over, ability to understand English, and ability to provide informed consent.

To assess ability to provide informed consent, interviewers will read aloud a brief description of the study and then ask participants to name one thing participation involves. This vetted question will be a check for one's cognitive ability to provide consent. Failure to name one thing will deem the recipient ineligible for the study due to inability to provide informed consent. If the recipient is able to provide informed consent, the interviewer will review the main points on the consent form over the phone with the beneficiary. This will include:

- The voluntary nature of the study;
- That the study will not directly benefit them;
- Their rights as study participants;
- That they can withdraw at any time; and
- Information on who to call if they have questions about their rights as research participants.

The interviewer will then ask the recipient if they want to participate in the study and collect verbal informed consent. After we collect consent, interviewers will collect contact information from the recipient including home address, preferred telephone numbers, and email addresses. Interviewers will obtain permission for the study to send reminders via text message for respondents with cell phones. The system will send electronic reminders to participants about survey completion and to keep in touch with respondents between each wave of data collection. We will confirm the recipient's address to mail incentives after survey completion.

At the close of the screener, recipients will have the option of completing the survey online themselves or over the telephone with an interviewer. For those recipients who opt to do the survey with an interviewer, the interviewer will give them the opportunity to do the survey immediately following the screener, or at a later date and time that is convenient for the recipient. The interviewer will schedule an appointment to call the recipient at their preferred date and time. We will ask recipients who opt to complete the survey on the web to provide a valid email address where they can receive information about how to access the web survey.

The recipient will receive an email with the survey URL and instructions for logging on. Recipients who elect to complete Survey 1 or Survey 2 on their own via the web will also receive email reminders if they have not started the web survey within four days and another emailed reminder on day 5. We will administer the eligibility screener via telephone and obtain consent prior to each survey. Survey participants will receive a gift card in the amount of \$50 and \$75 as a reimbursement for completing Survey 1 and Survey 2, respectively. Participation in the study is voluntary and will not affect respondents current or future benefits. The respondents are Study participants who are receiving SSA disability payments.

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

SSA's contractor, Westat, will design, develop and maintain a high quality, secure, and cost-effective information technology (IT) solution to support the WD-FAB data collection. Westat will develop an integrated web-based Study Management System (SMS) to maintain, track, and record all data we collect during the data collections. The SMS will serve as the mission control center, providing centralized management and operational support for project staff to monitor data collection activities during survey administration. The SMS will allow the tracking of electronic reminders and survey completion via multiple modes (telephone and web). It will also be integrated with the system that supports the study smartphone app to update participant contact information and set interview appointments. Using a web-based system allows us to enter, update, and store data in real-time so multiple users can access the system to view and enter information about participants to complete and monitor study activities. In addition, users can easily access the system from any computer with Internet access by simply typing in the URL address and using their secure login credentials. No Social Security Numbers will exist in the MIS. The telephone data collectors will have access to contact information stored within the SMS to administer the screener and telephone interviews, data collectors will not have access to survey responses.

Recipients can complete the survey online. In addition, recipients who opt to do the survey with an interviewer on the phone will be given the opportunity to do the survey immediately following the screener, or at a later date and time that is convenient for the recipient. The interviewer will schedule an appointment to call the recipient at their preferred date and time. We will develop a study smartphone app as a mechanism to keep in touch with participants; allow an easy and convenient way of updating contact information; and allow users to schedule appointments for the surveys, a smartphone app. Apart from collecting updated address and telephone contact information, the app will not collect any other study data.

To implement the app in the main study, Westat will include a flyer as part of the advance letter mailing package, including instructions on downloading the app. Participants who download the app will also receive push notification reminders from the app. These push notifications will include reminders:

- To schedule an appointment to complete the survey;
- About their scheduled appointments to complete the survey; and
- To complete the web survey if they opted to do survey online,

In addition to the capabilities for scheduling interviews, updating contact information, and sending reminders, the app also includes a terms and conditions page.

In accordance with the agency's Government Paperwork Elimination Act plan, SSA created an Internet version of the WD-FAB. Based on our data, we estimate

approximately 30% of respondents under this OMB number use the electronic version.

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**

The information we collect from this study will provide SSA with the data needed to assess the feasibility and value of incorporating the WD-FAB into the continuing disability review (CDR) process. We will administer the survey to the same sample twice, to establish a baseline and assess any potential changes in beneficiary's functioning over time. We need these two data collections at the indicated frequency because it allows adequate time to observe any changes in work related function among the beneficiaries. 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 April 28, 2021, at 86 FR 22510, and we received no public comments. The 30-day FRN published on August 11, 2021 at 86 FR 44123. 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 development of this form.

9. **Payment or Gifts to Respondents**

We will use a graduated incentive structure to encourage study participation and retention of respondents between Survey 1 and Survey 2:

- Respondents who complete Survey 1 will receive a \$50 Visa debit card, and
- Respondents who complete Survey 2 will receive a \$75 Visa debit card.
- Respondents who download the study smartphone app will receive an additional \$5 (added to their debit card for Survey 1 or Survey 2).

We estimate it will take respondents 50 minutes to complete Survey 1 and 75 minutes to complete Survey 2; it will take respondents a total of 125 minutes to complete both surveys. The study app provides a cost-efficient way for the study to maintain contact with participants between survey waves and collect updated contact information. In total, respondents will receive \$130 in Visa debit cards

for completing both surveys and downloading the study app.

We determined the graduated incentive structure of \$50 for completing Survey 1 and \$75 for completing Survey 2 to maximize response rates and encourage respondents to complete both surveys. One of the central goals of the study is to evaluate how WD-FAB scores and beneficiary functional information might change over time, therefore, participation in both surveys is of critical importance. An additional reason for the incentive structure is to provide an adequate incentive for respondents to complete Survey 2, which contains an additional 52 follow-up endorsement questions that are not included in Survey 1. Finally, with current inflation rates, we expect respondents will be more likely to respond to both surveys with the higher incentive rates.

SSA's management supports this incentive structure which is covered under SSA's FY 2020 research budget. SSA's Office of Acquisition and Grants included the incentive funds in the amount awarded in the contract to Westat.

10. **Assurances of Confidentiality**

SSA assures the respondents that the proposed collection of information is voluntary and we will keep the information we collect. We communicate this to respondents in the informed consent language during the screener, in the study invitation letter, and FAQs.

Westat has extensive experience conducting data collection in a secure environment. SSA will store all study materials Westat maintains in a secure project directory on the Westat network accessible only to project team members. SSA will provide data files to Westat via Government Services Online (GSO) secure transmission portal for the WD-FAB project.

Westat will assign a data steward who will download the sample file to a restricted access directory to which only the steward will have access. The data steward will then create a random participant identifier for each record. This ID will be used to track participants throughout data collection and analysis. The Westat data steward will create another special ID before loading the sample into the SMS. This ID provides an additional key that serves to tie the random participant ID with recruitment disposition data, survey and other study data, and the individual's Social Security Number (SSN). By using these special ID keys, Westat never releases an SSN to any staff (internal or external) at any time. The data steward, and a backup staff, will be the only individuals with access to SSNs.

We will keep all contact information, IDs, and password information in a crosswalk spreadsheet housed on the SMS developed for the WD-FAB study and we will maintain it on a password protected Westat project network accessible only to key project staff. We will keep any additional electronic documentation with participant-identifying information on a password protected network drive which is accessible only to select key staff working on the project.

We will keep all materials used for mailing purposes that include personal contact information securely locked in an office located at Westat. All Westat employees will sign the Confidentiality pledge and we will require Westat employees to complete Westat Human Subjects Protection training. SSA requires all Westat employees to complete a background screening process as well.

One month following data collection for each survey, Westat will provide SSA the raw data files, including sample frame data and response disposition, with individual identifiers to support SSA’s long-term analyses by SSA. Westat will securely transfer encrypted data to SSA via GSO secure transmission portal. Westat will destroy study data, including data backup tapes, upon completion of the study.

Data destruction at Westat involves deleting the data from their network. Westat’s backup retention policy states that they must keep all project backup tapes for 13 months, after which they erase, and overwrite them. Westat will delete all beneficiary contact information and survey data from Westat servers once SSA receives, reviews, and no longer has any questions for Westat about the data.

**11. Justification for Sensitive Questions**

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

**12. Estimates of Annualized Burden Hours and Costs**

**WD-FAB Survey 1**

<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>
Survey 1 competency screening	4,500	1	5	375	\$10.95*	\$4,106**
Survey 1 (respondents)	4,000	1	50	3,333	\$10.95*	\$36,496**
Survey 1 (non-respondents)	1,600	1	2	53	\$10.95*	\$580**
<b>Total</b>	<b>10,100</b>			<b>3,761</b>		<b>\$41,182</b>

**WD-FAB Survey 2**

<b>Modality of Completion</b>	<b>Number of Respondents</b>	<b>Frequency of Response</b>	<b>Average Burden per Response</b>	<b>Estimated Total Annual Burden (hours)</b>	<b>Average Theoretical Hourly Cost Amount</b>	<b>Total Annual Opportunity Cost</b>
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			(minutes)		(dollars)*	(dollars)**
Survey 2 competency screener	2,400	1	5	200	\$10.95*	\$2,190**
Survey 2 (respondents)	2,400	1	75	3,000	\$10.95*	\$32,850**
Survey 2 (non-respondents)	800	1	2	27	\$10.95*	\$296
<b>Total</b>	<b>5,600</b>			<b>3,227</b>		<b>\$35,336</b>

**WD-FAB Grand Total Burden Figures:**

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)*
<b>Totals</b>	<b>15,700</b>			<b>6,988</b>		<b>\$76,518</b>

\* We base this figure on average DI payments wages for disability recipients as reported by Social Security Administration data (<https://www.ssa.gov/legislation/2021FactSheet.pdf>).

\*\*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.**

Note: Westat will schedule an appointment to call the recipient at their preferred date and time; therefore, there the respondents will not incur an average wait time.

The total burden for this ICR is **4,655** burden hours (reflecting previously tested and validated WD-FAB instrument information data from the usability testing), which results in an associated theoretical (not actual) opportunity cost financial burden of **\$36,588.30**. 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. **Annual Cost To Federal Government**

The annual cost to the Federal Government is approximately **\$1,491,259.10**. This estimate is a projection of conducting the WD-FAB data collection, including the system and survey programming, administering the surveys, and analysis and reporting activities:



<b>Description of Cost Factor</b>	<b>Methodology for Estimating Cost</b>	<b>Cost in Dollars*</b>
Designing and Printing the Form	Design Cost + Printing Cost	\$223,689
Distributing, Shipping, and Material Costs for the Form	Distribution + Shipping + Material Cost	\$149,126
SSA Employee (e.g., field office, 800 number, DDS staff) Information Collection and Processing Time	GS-9 employee x # of responses x processing time	\$0
Full-Time Equivalent Costs	Out of pocket costs + Other expenses for providing this service	\$0
Systems Development, Updating, and Maintenance	Costs to complete the Systems Security Risk Assessment, develop the SSP, SAR, POA&M, and to maintain the data inventory	\$149,126
Quantifiable IT Costs	Any additional IT costs	\$447,378
Other	Survey Administration (Data Collection)	\$521,941
<b>Total</b>		<b>\$1,491,260</b>

\* We inserted a \$0 amount for cost factors that do not apply to this collection.

SSA is unable to break down the costs to the Federal government further than we already have. We used the figures above based on the expected costs from our contract with Westat.

15. **Program Changes or Adjustments to the Information Collection Request**  
This is a new data collection that increases the public reporting burden. See #12 above for updated burden figures.
16. **Plans for Publication Information Collection Results**  
As part of Westat's contract, we do not have plans to publish any results. Westat will provide SSA with the datasets along with descriptive analysis.
17. **Displaying the OMB Approval Expiration Date**  
SSA is not requesting an exception to the requirement to display an 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).