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## Supporting Statement for Promoting Opportunity Demonstration (POD) OMB No. 0960-0809

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### PART A: JUSTIFICATION

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#### A.1. Introduction and authoring laws and regulations

The Social Security Administration (SSA) is requesting a *Revision to an Existing Collection* to collect 2021 earnings and Impairment-Related Work Expenses (IRWE) data from Promoting Opportunity Demonstration (POD) treatment group subjects. SSA uses two forms to collect this information: (1) POD Monthly Earnings and Impairment-Related Work Expenses (IRWE) Reporting Form – referred to as the “POD Monthly Form”; and (2) POD End of Year Reporting (EOYR) Form – referred to as the “POD EOYR Form.” SSA is requesting to update these forms to collect 2021 earnings and IRWE information.

SSA uses the earnings and IRWE data collected on these forms to apply the benefit offset to volunteers who enrolled in POD and were randomly assigned to one of two treatment arms. Both treatment arms include a benefit offset of \$1 for every \$2 earned above the larger of the Trial Work Period (TWP) level (defined as \$940 in 2021) and the amount of the subject’s IRWEs. At the time of random assignment in 2017, the POD subjects who volunteered to enroll in POD were located in eight states: Alabama, California, Connecticut, Maryland, Michigan, Nebraska, Texas, and Vermont.

Congress required SSA to implement and evaluate POD for voluntary subjects. As part of the Bipartisan Budget Act (BBA) of 2015 (Public Law 114-74), Section 823, policymakers required SSA to carry out POD to test a new benefit offset formula for SSDI beneficiaries who volunteer to be in the study. The new rules, which also simplify work incentives, aim to promote employment and reduce dependency on benefits.

#### A.2. Description of Data Collection

Abt Associates, the contractor selected by SSA to implement POD, collects data from SSDI beneficiaries assigned to the two POD treatment groups (respondents) through two data collection instruments: (1) POD Monthly Form; and (2) POD EOYR Form. The POD implementation team collects earnings and IRWE data from POD treatment group subjects whose monthly earnings exceed the POD threshold. The POD implementation team submits the data it collects from treatment group subjects to SSA. SSA uses the data to apply the POD offset to treatment group subjects’ SSDI benefits. These two forms are shown in Attachments A and B, and we describe them below:

- 1. POD Monthly Form.** The POD implementation team collects monthly earnings and IRWEs from participants whose monthly earnings exceed the POD threshold. Each month, participants use a form to provide their employers’ names, along with their earnings from each employer and any IRWEs they claimed that month. Participants also submit documentation to the POD implementation team, such as paystubs and receipts for IRWEs. This information allows the POD implementation team to submit the data SSA needs to apply the POD offset.

**2. POD EOYR Form.** Beginning in 2018, the implementation team sent POD participants this form in advance of SSA’s annual August automated reconciliation process. The forms lists all of the earnings and IRWEs the participant reported for the previous year. The form instructs participants to review the amounts and to report any revised or missing amounts to the POD implementation team in advance of SSA’s end of year reconciliation. Participants use the POD Monthly Form to report the revised or missing amounts to the POD implementation team.

Respondents have two options for reporting their earnings and IRWE documentation contained in the POD Monthly Form and the POD EOYR Form: paper (mail or fax) or an online reporting portal. Respondents are encouraged to submit their earnings and IRWE documentation monthly, but can submit it the following year in advance of SSA’s end of year reconciliation process. While the collection of the earnings and IRWE data from respondents on the POD Monthly Form and the POD EOYR Forms is voluntary, failure to submit data could result in the inaccurate calculation of SSDI benefits.

Exhibit A.1 summarizes the time frames over which SSA, and the POD implementation team anticipate using the two forms to collect information.

Exhibit A.1. Timeline for data collection efforts

	2022			
	Q1	Q2	Q3	Q4
<b>POD Monthly Earnings and Impairment-Related Work Expenses (IRWE) Reporting</b>	X	X	X	
<b>POD End of Year Reporting (EOYR)</b>	X	X	X	

**A.3. Use of information technology to collect the information**

The POD implementation team uses information technology to facilitate implementation data collection in standardized and accurate ways. We replicated the POD Monthly Form in an electronic format (earnings reporting portal). This provides respondents the option of submitting these forms and supporting documentation on paper or electronically, using an online process.

**A.4. Why the information collected will not duplicate existing information**

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

**A.5. Minimizing burden on small businesses or other small entities**

Some beneficiaries who have institutional representative payees may participate in the demonstration. The small institutions may support the beneficiaries in submitting their earnings and IRWE documentation. The POD implementation team collects the minimum amount of information required for SSA to determine a beneficiary’s SSDI payments under POD.

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## A.6. Consequences of not collecting information or collecting it less frequently

The implementation data for POD, which the POD implementation team collects on the Monthly Reporting Form, is essential for SSA to operate POD and are not available from other sources. Collecting the data less frequently would increase the risk of SSA calculating the participants' SSDI benefit incorrectly, which could in turn cause participants to experience overpayments and underpayments.

## A.7. Special circumstances

The proposed data collection activities are consistent with the guidelines set forth in 5 *CFR* 1320.5 (Controlling Paperwork Burden on the Public, General Information Collection Guidelines). There are no circumstances that require deviation from these guidelines.

## A.8. Solicitation of public comment and other consultation with the public

### A.8.1. Federal Register

The 60-day advance Federal Register Notice published on November 30, 2021 at 86 FR 68034, and we received no public comments. The 30-day FRN published on February 7, 2022 at 87 FR 6929. If we receive any comments in response to this Notice, we will forward them to OMB.

### A.8.2. Consultation with the public

We did not consult with the public in the revision of the two forms.

## A.9. Payments or gifts to respondents

SSA does not provide payments or gifts to POD participants who submit information on the POD Monthly Form or the POD EOYR Form to the POD implementation team.

## A.10. Assurances of confidentiality

The subjects of this information collection and the nature of the information the team collects requires strict confidentiality procedures. SSA protects the information the POD implementation team 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.

In addition, the POD Implementation Data System (IDS) stores and handles POD implementation data in compliance with SSA's guidelines. SSA staff and study team members access the POD IDS via a secure, cloud-based virtual desktop infrastructure from their own workstations that allows remote desktop connections to access all systems resources securely. This is a password-protected site with secured socket layer (SSL) protocols for data transmissions over the internet. This ensures that we properly protect and guard participant data. We integrate data collected through the online portal into the POD IDS database via automated data scripts. We also enter data collected via mail into an earnings record created in the POD IDS and the implementation team scans, uploads, and attaches any supporting documentation. Once the implementation team scans the documentation, the team securely disposes of all paper copy participant PII.

The POD implementation team also developed and maintains a system security plan (SSP) for the POD IDS. The POD SSP provides an overview of the security requirements of the system and describes the controls for meeting those requirements. The SSP also describes responsibilities and expected behavior of all individuals who access the various system components and data. The implementation team updates the SSP as we add new functions to the system and new risks emerge. The SSP complies with all applicable federal and SSA guidelines and regulations and includes a series of guidelines covering all aspects of administrative, physical, and technical security areas.

**A.11. Justification for sensitive questions**

The POD Monthly Form and the POD EOYR Form include questions about household earnings that we do not deem sensitive. These forms also include questions about financial costs of impairment-related work expenses that respondents might consider private. However, this information is necessary for SSA to calculate respondents’ SSDI benefits accurately, and for SSA to determine the effects of POD. The data are only used for the purposes of calculating SSDI benefit payments to implement POD.

**A.12. Estimates of public reporting burden**

Data collection for the implementation of POD uses two data collection forms: (1) POD Monthly Form; and (2) POD EOYR Form. While both forms collect the same information, respondents do not submit the same information twice. Respondents use the POD Monthly Form to submit a single month’s earnings and IRWE documentation, usually the month following the date of the earnings or IRWE. Annually, the POD implementation team sends the POD EOYR form to all POD treatment group subjects with earnings above the POD threshold, and those whose earnings level is unknown. This form summarizes the respondent’s reported earnings for the previous year (as reported in the POD Monthly Form). The respondent reviews the POD EOYR Form and uses the POD Monthly Form to report additional earnings or IRWEs for the previous year, if needed.

The burden estimates assume that 2,000 POD treatment group participants will report their earnings and IRWEs for 2021. This estimate is based on the available earnings data indicating the number of participants who will need to report their earnings and IRWEs for 2021.

**Exhibit A.6. Annual burden estimates by modality and form type**

Modality of completion and form type	Number of respondents	Frequency	Number of responses	Average burden per response (in minutes)	Total annual burden (in hours)	Average Theoretical Hourly Cost Amount (dollars)**	Total Annual Opportunity Cost (dollars) ***
POD Monthly Earnings and Impairment-related work Expenses (IRWE) Reporting	1,000	6	6,000	40*	4,000	\$27.07* *	\$108,280** *

Form--by <i>paper</i>							
POD Monthly Earnings and Impairment-related work Expenses (IRWE) Reporting Form-- <i>online</i>	1,000	6	6,000	5	500	\$27.07*	\$13,535***
POD End of Year reporting (EOYR) Documentation	2,000	1	2,000	8	267	\$27.07*	\$7,228***
Totals	4,000		14,000		4,767		\$129,043**

\*The 40 minute burden per respondent assumes 10 minutes to report by paper (mail or fax) for all 1,000 respondents plus 30 minutes travel time to reach a fax machine. The 30 minute travel time assumes that one half of the 1,000 total respondents (500) will travel 60 minutes round trip to a fax machine and one half of total respondents (5) will not need to travel at all. 60 minutes \* .5 respondents = 30 minutes.

\*\* We based this figure on average U.S. citizen's hourly salary, as reported by Bureau of Labor Statistics data ([https://www.bls.gov/oes/current/oes\\_nat.htm#00-0000](https://www.bls.gov/oes/current/oes_nat.htm#00-0000)).

\*\*\* 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.**

### A.13. Annual cost to the respondents (other)

There are no direct costs to respondents for completing either form other than their time to participate in the study as described in section A.12. SSA and the POD implementation team will not ask respondents to maintain any new records. The implementation team will collect and maintain all data from the implementation data collection forms, and is responsible for all costs associated with the form data collection, storage, processing, and other functions related to these data. Section A.14 summarizes these costs, which are costs to the federal government under an SSA contract.

### A.14. Annualized cost to federal government

Exhibit A.7 shows the costs for the POD Monthly Earnings and IRWE Reporting Form and POD EOYR Form. The contractor budgeted labor costs for data collection activities associated with this submission, including developing the forms and estimated costs for data collection activities.

Exhibit A.7. POD implementation contractor annual data collection costs to the federal government

Fiscal Year	POD Monthly Earnings and Impairment-Related Work Expenses (IRWE) Reporting Form	POD End of Year Reporting (EOYR) Form	Total
2022	\$160,116	\$16,422	\$176,538

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#### A.15. Program changes or adjustments to the information collection request

The burden hour time to complete the POD Monthly Form increased for paper only submissions as we included a travel time of 30 minutes for approximately half of the respondents who may need to travel to a fax machine to submit their forms. As we are near the end of the data collection for this demonstration project, we only expect to collect the information from these two forms for another six-month period. Therefore, we decreased the frequency of response for the Monthly form as well. We did not increase the burden for the POD EOYR Form; however, we note that fewer respondents will complete these forms in the last half year of this data collection. In addition, we included the Average Theoretical Hourly Cost Amount for both forms.

Finally, we removed the following items from this request as we have completed collection of the data from these items:

- POD Baseline Survey
- POD Informed Consent Form
- POD Onsite Audit of Case Files in MIS
- POD Semi-Structured Interviews with Treatment Group Subjects
- POD Staff Interviews with Site Staff
- POD Year 1 Follow Up Survey
- POD Year 2 Follow Up Survey

The removal of these completed information collections decreases the total annual reporting burden for this information collection request.

#### A.16. Plans for public information collection results

The POD implementation team will not publicize any data it collects.

#### A.17. Displaying the OMB approval expiration date

SSA is not requesting an exception to the requirement to display the OMB approval expiration date. The POD implementation team displays the OMB expiration date on all forms.

#### A.18. Exception 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).