Supporting Statements Part A for Disability Perception Survey (DPS) OMB No. 0960-NEW

A. <u>Justification</u>

1. Introduction/Authoring Laws and Regulations

The Social Security Administration's (SSA's) Social Security Disability Insurance (SSDI) program provides crucial financial support to individuals unable to work due to a medical condition. Having access to and understanding information about SSDI among working adults is an important factor in connecting people with benefits. The purpose of the Disability Perception Survey (DPS) is to understand the type of information working adults currently have about the SSDI program to improve projections of disability applications and incidence.

SSA is requesting clearance to administer the DPS to a sample of working age adult SSDI program recipients, and those who may qualify for this benefit, to capture attitudes and perceptions about SSDI among working-age adults in the general population, and to determine what roles those factors ultimately play in an individual's decision to apply to the program.

The DPS evaluation will consist of two parts: (1) the DPS administered to working-age adults (18 to 64 years of age) SSDI program recipients, and those who may qualify for SSDI benefits; and (2) links of the survey data, including the individuals' social security numbers, to individuals' administrative records for research purpose. SSA will use the data the DPS collects to learn about the average American SSDI adult recipient's knowledge and to gain an understanding of the SSDI program and about who qualifies for these benefits. Section 1110(a) of the Social Security Act gives the Commissioner of Social Security authorization to help fund research or demonstration projects relating to the prevention and reduction of dependency. SSA contracted with NORC at the University of Chicago to conduct the DPS data collection. NORC conducted nine cognitive interviews between September 18, 2020, and October 2, 2020 to test and refine the DPS. The testing examined respondents' comprehension of the content, definitions, and terminology used in the survey. In addition, this process also helped examine question ordering and the clarity of supporting text and introductory statements. SSA submitted a clearance package to OMB to conduct the DPS pretest and received approval on May 1, 2021.

2. **Description of Data Collection**

The DPS will focus on a series of multiple-choice, open-ended, and vignette-style questions across five topic areas:

- General knowledge about the SSDI program, including perspectives on the causes of disability, eligibility requirements, the likelihood of receiving benefits, and the documentation required to apply for the program;
- Perceptions about the impact of work-limiting impairments including how and to what degree people with disabilities participate in the workforce, their work outcomes, use of services, barriers to work, and

- knowledge about Social Security Administration (SSA) programs designed to help beneficiaries find and keep jobs;
- Thoughts about SSDI based on personal experience or associations with SSDI beneficiaries and others, the likelihood of receiving benefits due to changes in one's personal health status, the impact of reduced financial resources, and factors considered when deciding whether to apply for SSDI;
- Opinions and reactions to how impairments described in brief vignettes of work-limiting and disabling experiences may affect current or future employment; and
- The impact of the COVID-19 pandemic on employment or participation in SSDI or other safety net programs.

The DPS is targeting 5,011 completed interviews among 18-64 year old adults across the U.S. population.

Recruitment

NORC will sample respondents for the study through NORC's AmeriSpeak sampling frame. AmeriSpeak uses a multi-stage probability sample that fully represents the U.S. household population. NORC uses a two-stage process for AmeriSpeak panel recruitment:

- **Initial recruitment:** NORC will invite panelists to participate in the DPS by email and or SMS text, with an invitation through the AmeriSpeak member web portal, which alerts panelist there is a survey available to them. The participant will receive an email with the survey URL which allows them to log into AmeriSpeak. NORC will also invite panelists who previously indicated their preference for responding to surveys by telephone. For those who request a telephone survey, NORC's telephone interviewers will call the respondent and ask them to participate in the survey, if the respondent wants to participate NORC will conduct the survey.
- **Non-response follow-ups:** NORC will sample a portion of non-responders and follow-up with a face-to face recruitment of the sampled non-responders. Non-response follow-up reduces non-response bias significantly by improving the representativeness of the AmeriSpeak Panel with respect to certain hard-to-reach segments of the population underrepresented by recruitment relying only on mail and telephone.

Eligibility criteria include those ages 18-64 years old who understand English or Spanish, and who have the ability to provide informed consent as well as a Social Security Number.

Participants in the DPS will receive the Informed Consent as part of the first screens of the survey. If NORC conducts the survey by telephone, the interviewer will review the main points on the consent with the participant. The Informed Consent, whether online or read by the interviewer, will include:

• The purpose of the survey and the primary topics addressed in the survey

questions;

- The information that the respondents may withdraw at any time;
- The voluntary nature of the study;
- A statement that the information collected is completely confidential and will not be used by SSA for the purposes of determining eligibility for benefits, nor for purposes other than research or program evaluation;
- The approximate time it will take to complete the survey;
- The incentive amount for participation, and how the respondent will receive their incentive;
- Information on who to call if they have questions about their rights as a survey participants;

If the respondents give their informed consent, but cannot provide their SSN, the survey will end, and the respondent will not continue further. Survey participants will receive \$20 as reimbursement for completing the DPS.

Following the emailing of the survey URL, NORC will follow up 10 times over the course of a 32-week field period to remind respondents to complete the survey. NORC will send the participants reminder scripts both by email and text messages to complete the survey. NORC will also send reminders by mail, via a reminder letter and postcard. The respondents are working adults (age 18-64) SSDI program recipients, and those who may qualify for SSDI benefits for SSDI benefits.

3. Use of Information Technology to Collect the Information

Amerispeak will allow the tracking of electronic reminders and survey completion and will serve as the mission control center providing, centralized management and operational support. During the AmeriSpeak recruitment process, panelists will be offered an opportunity to choose their preferred electronic mode via the web or phone for future participation in AmeriSpeak surveys. For panelists using smartphones for web-mode surveys, the NORC survey system renders an optimized presentation of the survey questions for these mobile users. Although the Disability Perceptions Survey supports mixed-mode data collection, both modes will be administered primarily online through AmeriSpeak's web-based application. For Panel members who indicated a preference for phone communications, we will administer the survey at a time that is convenient to them. A telephone option improves the coverage of the sample for those without Internet access, with limited access, and with Internet access but who are unwilling to share an email address. NORC's telephone interviewers administer surveys using a data collection system that supports both the phone and web modes, providing an integrated sample management and data collection platform.

In accordance with the agency's Government Paperwork Elimination Act plan, SSA created an Internet version of the DPS. Based on our data, we estimate approximately 85% of respondents under this OMB number will 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 affect small businesses or other small entities.

6. Consequence of Not Collecting Information or Collecting it Less Frequently
The information we collect from the DPS study will provide SSA with the data
needed to determine what the public understands or misunderstands about the
SSDI program, and SSA will be able to improve communications with the public.
For example, there may be large groups of people who do not apply for SSDI
benefits because they don't know about the program, or think they are not
eligible. This survey will help identify those people, and SSA can then target
them in future communications. 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 March 10, 2022, at 87 FR 18453, and we received no public comments. The 30-day FRN published on June 1, 2022, at 87 FR 33282. 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 provide payments of 20,000 AmeriPoints (equivalent of \$20) to survey participants, since our contractors who are conducting this study regularly compensate participants for this level of participation.

10. **Assurances of Confidentiality**

All individuals will be assured of the confidentiality of their replies and other personal information under *Section 934(c)* of the Public Health Service Act, *42 USC 299c-3(c)*. NORC will inform Web survey respondents as well as those who complete the survey by phone their participation is voluntary. Prior to the start of the survey, NORC will show or read a landing page that will include a statement of confidentiality containing the language below to prospective respondents. The confidentiality statement will include SSA's purpose for collecting the information, and will inform the respondent that the statement is in accordance with this statute. SSA will not use or disclose any identifiable information about them to anyone other than SSA for any other purpose without their prior consent. Ultimately, we will examine how this knowledge and these experiences affect the

future use of services. SSA is conducting this survey for research purposes.

In addition to the project-specific informed consent, SSA will provide all panelists with a Privacy Statement, which outlines the information that we will collect and how we will use the information. Because we will ask each panel member to provide key demographic data such as age, gender, race/ethnicity, state of residence, household income, as well as their Social Security Number, the Privacy Statement will also tell panel members how they can verify the accuracy of their PII and how they can request that the information be deleted or updated.

The AmeriSpeak Privacy Statement includes the following:

- A promise to treat all AmeriSpeak panelists and their information with respect.
- The assurance that participation in any AmeriSpeak study is completely voluntary and that panel members may choose not to answer any questions that they do not wish to answer. Furthermore, panel members may withdraw their participation in AmeriSpeak at any time.
- AmeriSpeak will never try to sell the panel member anything or ask for donations.
- AmeriSpeak will not share PII with any clients unless panel members have given explicit permission to do so. Only survey responses will be shared with clients.
- AmeriSpeak will never share personal information with telemarketers or others who would try to sell panel members anything.
- AmeriSpeak has established security measures to protect the security and confidentiality of its panel members.
- Panel members control their personal information and have the right to view their personal information or ask AmeriSpeak to delete it.

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

Modality of Completio n	Number of Responden ts	Frequenc y of Response	Average Burden per Respons e (minute s)	Estimate d Total Annual Burden (hours)	Average Theoretic al Hourly Cost Amount (dollars)*	Total Annual Opportuni ty Cost (dollars)**
DPS (Web version)	4,259	1	17	1,207	\$11.70*	\$14,122**
DPS(Phon e version	752	1	17	213	\$11.70*	\$2,492**
Totals	5,011			1,420		\$6,614**

* We based this figure on the average DI payments based on SSA's current FY 2022 data (https://www.ssa.gov/legislation/2022factsheet.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.

We base our burden estimates on internal usability testing. Per our management information data, we believe that the **17** minutes shown in our chart above accurately shows the average burden per response for reading the instructions, gathering the facts, and answering the questions. Based on our current internal usability testing data, the current burden information we provided is accurate. The total burden for this ICR is **1,420** burden hours (reflecting SSA management information data), which results in an associated theoretical (not actual) opportunity cost financial burden of **\$6,614**. 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 \$1,146,500. This estimate is a projection of the costs for NORC to conduct the survey and analysis, and for SSA to oversee the contract. These costs break down as follows:

Description of Cost	Methodology for Estimating	Cost in Dollars*
Factor	Cost	
Designing and Printing the	Design Cost + Printing Cost	0*
Form		
Distributing, Shipping, and	Distribution + Shipping +	0*
Material Costs for the	Material Cost	
Form		
Contractor Information	GS-9 employee x # of	\$46,500*
Collection and Processing	responses x processing time	
Time		
Full-Time Equivalent	Out of pocket costs + Other	\$0
Costs	expenses for providing this	
	service	
Systems Development,	Contract cost – design survey,	\$1,100,000
Updating, and	create sampling plan,	
Maintenance	implement survey, conduct	
	analysis	
Quantifiable IT Costs	Any additional IT costs	0*
Total		\$1,146,500

^{*} We have 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 NORC.

15. **Program Changes or Adjustments to the Information Collection Request**This is a new data collection that increases the public reporting burden. See question #12 above for updated burden figures.

16. Plans for Publication Information Collection Results

As part of NORC contract, we do not have plans to publish any results. NORC 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).