

**Supporting Statement for Forms SSA-4565 and SSA-4566
Help Line Work Incentives Planning and Assistance (WIPA) Referral and WIPA
Intake; WIPA Case Notes and
WIPA STAR (Services, Tracking, and Reporting) System
OMB No. 0960-0629**

A. Justification

1. Introduction/Authoring Laws and Regulations

The legislative authority for the Work Incentives Planning and Assistance (WIPA) Program is found in the *Social Security Act* and *Section 121* of the *Ticket to Work and Work Incentives Improvement Act of 1999*. The legislative authority for the Ticket Program Manager (TPM) is *Public Law 106-170*.

WIPA

Section 1149 of the *Social Security Act* (Act) and *Section 121* of the *Ticket to Work and Work Incentives Improvement Act of 1999* requires the Commissioner of Social Security to establish community-based work incentives planning and assistance programs that disseminate information on work incentives programs to assist persons with disabilities in their employment efforts.

In response to the legislation, the Commissioner established a competitive program of cooperative agreements to provide work incentives planning, assistance, and outreach called the Work Incentives Planning and Assistance (WIPA) Program. WIPA is part of SSA's strategy for increasing the number of Social Security Disability Insurance (SSDI) and Supplemental Security Income (SSI) beneficiaries to return to work and achieve economic self-sufficiency and independence in the community.

Potential awardees are State and local governments, public and private organizations, and nonprofit and for-profit organizations. Using a population-based formula, Social Security has established as many WIPA project sites as needed in each state to ensure sufficient coverage of services for all SSDI beneficiaries and SSI recipients nationally. We currently support seventy-four (74) WIPA grantees.

Ticket Program Manager

In an effort to expand the range of employment support services available to SSDI and SSI beneficiaries, the *Ticket to Work and Work Incentives Improvement Act of 1999* (*Public Law 106-170*) added *Section 1148* to the *Social Security Act*. *Section 1148* addressed several of barriers that SSDI beneficiaries and SSI recipients encounter in obtaining jobs and continuing to work by: (1) Expanding the availability of health care services and coverage; (2) Eliminating certain work disincentives; (3) Providing for enhanced benefits planning and assistance from other public and private sources; and (4) Creating the Ticket-to-Work and Self-Sufficiency Program (Ticket Program).

The Ticket Program provides disability beneficiaries with more options for employment services while increasing provider incentives to serve these individuals. The Ticket Program directs Social Security to provide SSDI beneficiaries and SSI recipients with a Ticket that they may use to obtain Vocational Rehabilitation (VR) services, employment services, and/or other support services from an Employment Network (EN) of their choice and establish agreements with ENs to provide such services. *Public Law 106-170* authorizes the Commissioner of Social Security to enter into an agreement(s) with a Program Manager(s) to assist in administering the Ticket Program. In 2021, SSA awarded the Ticket Program Manager contract, consisting of a base year and four option years. The Ticket Program Manager operates the Ticket to Work Help Line to assist beneficiaries interested in working or working more.

2. Description of Collection

As part of SSA's strategy to assist SSDI beneficiaries and SSI recipients who wish to return to work and achieve self-sufficiency, SSA established the WIPA program. This community based, work incentive, planning and assistance project collects identifying claimant information via project sites and community work incentives coordinators (CWIC). SSA uses this information to ensure proper management of the project, with particular emphasis on administration, budgeting, and training. In addition, project sites and CWIC's collect data from SSDI beneficiaries and SSI recipients on background employment, training, benefits, and work incentives. SSA is interested in identifying SSDI beneficiary and SSI recipient outcomes under the WIPA program, to determine the extent to which beneficiaries with disabilities and SSI recipients achieve their employment, financial, and healthcare goals.

SSA's WIPA staff uses Form SSA-4565 (intake form) to collect information not available on the Help Line referral. In some circumstances, the referral for services comes from another source, if so; the CWIC may complete Form SSA-4565 when they first contact the beneficiary. Form SSA-4565 collects data from the beneficiaries including demographic, background, employment, training, benefits, and work incentives to enable the WIPA program services to best meet the needs of SSDI beneficiaries and SSI recipients.

SSA uses Form SSA-4566 (case notes form) to keep files up to date, recording subsequent contacts with the beneficiary, or with service providers on the beneficiary's behalf. We do not collect this information for data analysis; the WIPA project staff uses it to document their services. We may review files containing the forms when we conduct on-site reviews, but normally, the WIPA project staff either store the information on SSA-provided encrypted storage devices, or in hard copy in a locked file cabinet for later reference. The respondents are SSDI beneficiaries; SSI recipients; community project sites; and employment advisors.

SSA uses Form SSA-4567 (Help Line referral form) which is the vehicle that the Ticket to Work Help Line (Help Line) uses to alert the WIPA project that a beneficiary requires WIPA services. The Help Line Call Center Representative (CSR) completes the form with information the beneficiary provides and some information from our systems. The CSSR then emails the form via encrypted email to a secure mailbox at the WIPA site. The WIPA staff use the information to contact the beneficiary and determine if the individual is eligible for services. If so, then the WIPA staff uses the intake form to collect information not available on the Help Line referral.

SSA's WIPA STAR System is a new management and reporting tool Social Security developed for the WIPA program in place of the ETO system that SSA discontinued in FY 2018. The initial release of the data system, scheduled for the summer of 2022, will contain: (1) select fields from the form SSA-4565 to provide Social Security with information on beneficiaries served under the WIPA program; (2) all the fields on the form SSA-4566 to allow WIPA grantees to manage their cases notes for beneficiaries; and (3) fields not collected on the forms SSA-4565 and SSSA-4566 necessary for SSA to monitor WIPA grantees' performance and progress toward meeting the nine WIPA benchmarks. Future releases of the system will collect all the fields on the form SSA-4565. The database will be accessible via the Internet.

The respondents are SSDI beneficiaries, SSI recipients, community project sites, and community work incentives coordinators.

3. Use of Information Technology to Collect the Information

Form SSA-4565

The Ticket to Work Help Line agents' complete lines 1-20 on the form using an editable PDF file, entering information collected from respondents (beneficiaries) over the phone. The WIPA grantees complete lines 21-60 on a paper form, also gathering information from respondents over the phone. The WIPA grantees then enter select fields from the form into the WIPA STAR system, an Internet-based modality. The expectation is that 75% of respondents will complete the SSA-4565 in the manner described. For the remaining 25%, respondents contact their local WIPA grantee directly for services and the WIPA grantee completes fields 1-60 on the form and then enters select fields into the WIPA STAR system. SSA has plans in the upcoming two years for the WIPA grantees to enter all the fields into the form SSA-4565 in the WIPA STAR system. When we are able to schedule this form for conversion to an Internet version for the WIPA grantees, we will submit a Change Request to OMB to request prior approval.

Form SSA-4566

This form is completed by respondents (WIPA grantees) who record interactions (via phone, in person or email) with a beneficiary or a third-party after the interaction occurs. The WIPA grantees will use the WIPA STAR system, an Internet-based modality, to record the information on the form. The expectation

is that 100% of respondents will enter all case notes collected on the form SSA-4566 directly into the WIPA STAR system. The paper version of the form SSA-4565 will be available if WIPA grantees do not have internet access.

WIPA STAR System

The respondents (WIPA grantees) will use the WIPA STAR system, an Internet-based modality, to record select fields from the form SSA-4565, all fields on the SSA-4566 and fields not on either form that SSA requires to measure the grantees' progress meeting the WIPA benchmarks and to conduct monitoring and oversight of the WIPA grantees' performance. In accordance with the agency's Government Paperwork Elimination Act (GPEA) plan, SSA created an Internet, Intranet, and automated version for the Internet Direct Deposit Application. We estimate approximately 100% 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 significantly affect small businesses or other small entities.

6. Consequence of Not Collecting Information or Collecting it Less Frequently

Without this data collection as designed Social Security could not gather the information needed to support policy and program investment, inform the strategies and approaches leading to improved employment outcomes and administer and report on a successful program that meets the needs of SSDI beneficiaries and SSI recipients. 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 13783, and we received no public comments. The 30-day FRN published on May 24, 2022, at 87 31598. If we receive any comments in response to this Notice, we will forward them to OMB

9. Payment or Gifts to 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 Sensitive Questions

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	Number of Responses	Average Burden per Response (minutes)	Estimated Total Annual Burden (hours)	Hourly Cost Amount (dollars)*	Opportunity Cost (dollars)
SSA-4565	32,000	1	32,000	25	13,333	\$16.29*	\$217,000
SSA-4566	360	890	320,400	2	10,680	\$16.29*	\$173,000
WIPA STAR System	720	1,869	1,345,680	20	448,560	\$16.29*	\$7,307,000
Totals	33,080	2,760	1,698,080		472,573		\$7,698,000

* We based this figure on the average DI payments based on SSA's current FY 2022 data (<https://www.ssa.gov/legislation/2022factsheet.pdf>); and the average Office and Administrative Support hourly wages, as reported by Bureau of Labor Statistics data (<https://www.bls.gov/oes/current/oes430000.htm>) Office and Administrative Support Occupations (bls.gov).

** 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 current management information data, which includes data from actual interviews, as well as from years of conducting this information collection. Per our management information data, we believe that 2, 20 and 25 minutes accurately shows the weighted average burden per response for reading the instructions, gathering the facts, and answering the questions. Based on our current management information data, the current burden information we provided is accurate. The total burden for this ICR is **472,573** burden hours (reflecting SSA management information data), which results in an associated theoretical (not actual) opportunity cost financial burden of **\$7,698,214**. 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 \$23,003,420. This estimate accounts for costs from the following areas:

Description of Cost Factor	Methodology for Estimating Cost	Cost in Dollars*
Designing and Printing the Form	Design Cost + Printing Cost	\$0*
Distributing, Shipping, and Material Costs for the Form	Distribution + Shipping + Material Cost	\$0*
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	GS-9 employee x man hours for development, updating, maintenance	\$3,420*
Quantifiable IT Costs	Any additional IT costs	\$23,000,000*
Total		\$23,003,420

* 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. In addition, it is difficult for us to break down the cost for processing a single form, as field office and State Disability Determination Services staff often help respondents fill out several forms at once, and the time it takes to do so can vary greatly per respondent. As well, because so many employees have a hand in each aspect of our forms, we use an estimated average hourly wage, based on the wage of our average field office employee (GS-9) for these calculations. However, we have calculated these costs as accurately as possible based on the information we collect for creating, updating, and maintaining these information collections.

15. **Program Changes or Adjustments to the Information Collection Request**
When we last cleared this IC in 2020, the burden was 25,000 hours. However, we are currently reporting a burden of 472,573 hours. This change stems from an increase in the number of responses from 90,000 to 330,80 from adding the WIPA Star System. The new WIPA Star System is a new data system that increases the public reporting burden. See question #12 for burden estimates. There is no change to the burden time per response. Although the number of responses changed, SSA did not take any actions to cause this change. These figures represent current Management Information data.
16. **Plans for Publication Information Collection Results**

SSA will not publish the results of the information collection.

17. Displaying 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.

For the **Internet version** SSA is not requesting an exception to the requirement to display the OMB approval 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).

B. Collections of Information Employing Statistical Methods

SSA does not use statistical methods for this information collection.