

**Supporting Statement for the Information Collection Tools for the State of Georgia’s  
Criminal Justice Coordinating Council’s (CJCC) Evaluation of the Implementation of the  
SSI/SSDI Outreach, Access, and Recovery (SOAR) Model in County Jails  
OMB No. 0960-NEW**

**A. Justification**

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

The Social Security Administration (SSA) announced under Federal Register 86 FR 24427 on May 6, 2021, a new funding opportunity, the Interventional Cooperative Agreement Program (ICAP). ICAP allows SSA to partner with various non-federal groups and organizations to advance interventional research connected to the Supplemental Security Income (SSI) and Social Security Disability Insurance (SSDI) programs. *Section 1110(a) of the Social Security 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 is requesting approval to collect data necessary to evaluate an intervention with Georgia’s Criminal Justice Coordinating Council (CJCC) under ICAP. SSA awarded CJCC a cooperative agreement to conduct an intervention and evaluation of Supplemental Security Income (SSI)/Social Security Disability Insurance (SSDI) Outreach, Access, and Recovery (SOAR) model in county jails with inmates with serious and persistent mental illness (SPMI) across the state. In addition to SSA, CJCC partnered with the following: 1) Applied Research Services (ARS); 2) the Georgia Department of Behavioral Health and Developmental Disabilities (DBHDD); and 3) four county jails to implement the program. A division of the CJCC, Georgia Statistical Analysis Center (GASAC), supports all data collection and analysis with the goal of assisting the CJCC’s planning and development of strategies to improve the criminal justice system in Georgia. SSA will collect program data for research and evaluation purposes. Through the cooperative agreement, SSA oversees all data collection activities. SSA, CJCC, and the other program collaborators will be the primary users of the collected data

**2. Description of Collection**

Investigators hypothesize that untreated mental illness and repeated psychiatric crises may be a factor in jail recidivism. Connection to SSI/SSDI and attendant insurance benefits may help a person with SPMI obtain treatment and interrupt criminogenic behavior. The SOAR intervention will connect respondents in four county jails identified as having SPMI to Medicaid Eligibility Specialists (MES) hired and trained by the Georgia DBHDD, who will help them apply for SSI and SSDI. Respondents in two of the four counties (Fulton County Jail and Cobb County Jail) will also have the option of working with a Forensic Peer Mentor (FPM), a formerly incarcerated individual who is familiar with resources that may help participants increase their quality-of-life post incarceration and avoid recidivism. SSA anticipates the two DBHDD MES will each serve 45 participants per year, for a total of 90 participants per year. To maximize the likelihood of the SSI/SSDI application approval, the MES will employ the SOAR method, which uses in-depth medical and personal summaries of disability to facilitate the SSI/SSDI application process. Researchers will collect

data from participant surveys to evaluate and study the impact of the intervention. Through this survey-collected data, the State of Georgia, participating counties, DBHDD, and SSA hopes to address the following research questions:

- Does connection to a SOAR-trained specialist increase the likelihood that a person with SPMI in jail will be approved for SSI/SSDI benefits?
- If a person with SPMI receives SSI/SSDI benefits, are they able to connect to treatment resources that they may not have been able to obtain before?
- If a person with SPMI connects to treatment resources and successfully engages with them, are they able to achieve mental health recovery and stay out of jail?

## **Recruitment**

The DBHDD's MESs will collect data about the outcomes for individuals who choose to participate in an intervention to help them apply for SSI/SSDI benefits for research and evaluation purposes. The DBHDD will identify potential participants using jail intake information that denotes individuals as people who could benefit from working with one of their MES. The MES will ask individuals if they would like to participate in the demonstration; the MESs will provide the individual with services regardless of whether or not they agree to participate in our project. If an individual agrees to participate in the demonstration, they will complete the following: (1) consent form, and initial enrollment survey; and (2) the follow-up survey.

### **1. Consent form and initial enrollment survey:**

**Consent form:** Before participating in the research, the MES will provide the participants with a paper consent form in person and will request the participants complete and sign it. SSA requires a wet signature on the consent form; therefore, we do not accept an electronic signature. The consent form will include the following key element:

- The voluntary nature of the study;
- What personal information will be requested from them
- How their information will be used
- What safeguards are in place to protect their information
- 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 written consent form will include a participant number, which researchers will utilize to identify the participants in other information collection tools listed. The consent form will be the sole document containing both the participants' personal identification information and the participant number.

**Initial enrollment survey:** The MES will ask the program candidates to participate and respond to a one-time, initial enrolment survey. The survey will include questions about the participant's quality of life; mental health status; level of financial freedom; and their feelings about the SSI/SSDI application process. The participant fills out the survey on paper immediately after the MES completes the SSDI/SSI application. The participant may request assistance reading and filing out the survey, but they will not need information from outside parties to complete it. The initial enrollment survey is a qualitative survey.

## **2. Follow-up Surveys:**

The CJCC research analyst will administer the follow-up survey to participants two more times for evaluation purposes. The analyst will use the same survey tool for both follow-up surveys, scheduled at 6 months and 1 year after participants have given their consent to participate. Initially, participants will have access to the follow-up survey tool online. However, if the CJCC analyst does not receive a response within two to three weeks, participants will have the option to respond to the survey over the phone. The follow-up survey includes several questions from the initial enrollment survey to assess any changes in the participant's quality of life, mental health status, and level of financial freedom. Additionally, the survey asks participants to evaluate their experience with the MES if they were denied benefits but continued working with them. The follow-up survey also includes questions regarding their experience with the Forensic Peer Mentor (FPM) if that option was available. The participants have the option to not answer survey questions if they do not wish to, and they can stop answering the survey questions at any time, even if they have already begun. The IRB-approved informed consent form states this information.

We identified the following psychological costs based on the requirements for this information collection:

- **Psychological Cost #1:**
  - **Requirement for the Program:** The initial information collection instrument is the consent form, which explains the purpose and activities involved if the individual agrees to participate. The individual will be provided SOAR services by the MES regardless of whether they agree to participate in the evaluation.
  - **Psychological Cost:** The individual may feel the need to agree to participate in the evaluation in return for the MES providing help with their application. The MES will instruct individuals that participation in the evaluation is voluntary and that services are not contingent on participation.
- **Psychological Cost #2:**
  - **Requirement for the Program:** The baseline enrollment survey asks an individual to provide personal information about themselves. Respondents will complete the baseline survey in the same session as the consent form, which

explains the purpose and activities involved if the individual agrees to participate.

- **Psychological Cost:** The individual may perceive these questions as unduly invasive, and these factors can lead individuals to abandon completing the survey and revoking their consent to participate in the evaluation, as they have the right to do, as stated in the IRB-approved informed consent form.
- **Psychological Cost #3:**
  - **Requirement for the Program :** The follow-up survey asks an individual to provide personal information about themselves. We will ask the same follow-up survey questions in two intervals: 6 months after enrollment and 1 year after enrollment. We will provide the individual with the same information each time the individual receives the follow-up survey to remind them of their enrollment, as well as the purpose and goals of the evaluation.
  - **Psychological Cost:** The individual may perceive these questions as unduly invasive, and these factors can lead individuals to abandon completing the survey and revoking their consent to participate in the evaluation, as they have the right to do, as stated in the IRB-approved informed consent form.

There are no learning costs associated with this program, as DBHDD will explain the program to individuals eligible to participate in the evaluation. In addition, there is no need for any research beyond reading instructions to understand how to comply with any of the information collection tools. The consent form explains the purpose and activities that will be involved if the individual agrees to participate in the evaluation and requires only a signature. The baseline and follow-up surveys ask an individual to provide personal information about themselves.

The respondents are individuals with serious and persistent mental illness incarcerated in county jails in the state of Georgia.

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

GASAC will collect the survey data using International Business Machines (IBM) Statistical Package for Social Sciences (SPSS) Interviewer Server Administrator (ISA) during the SOAR evaluation. IBM SPSS ISA is a software program the GASAC uses for all survey-based data collections. The software platform is hosted on CJCC's Azure Cloud Servers, which also house the database backend. CJCC's IT department maintains the server infrastructure through our Microsoft 365 Enterprise Licensing Agreement (ELA). The ELA between CJCC and Microsoft requires maintaining all data and infrastructure on Azure Cloud Services, including redundancies and backups, within the continental United States. The IBM SPSS ISA application which CJCC utilizes requires the same windows authentication as the computer logins within CJCC, along with two-factor authentication. GASAC restricts access to the IBM SPSS ISA applications and the data collections to their research analysts and database administrators within the GASAC at CJCC, they are the only ones who can access the

data.

- **Consent form:** The participant will sign the informed consent on paper when the MES meets with them in jail. The MES will scan the informed consent form to GASAC IBM SPSS and will keep the physical documents secured in a locked file cabinet in the DBHDD regional office.
- **Initial enrollment survey:** The MES will administer the initial enrollment survey in person once they have gathered the information to complete the application. Afterward, the MES will manually enter the survey responses into the GASAC IBM SPSS ISA for aggregate analysis and evaluation.
- **Follow-up survey:** GASAC's IBM SPSS ISA will electronically disseminate the follow-up surveys by sending a secure link to the participants' emails, which will be obtained from the consent forms. If participants do not submit a response within two to three weeks, the GASAC research analyst will contact the participant by telephone to collect survey responses over the phone. The GASAC research analyst will then immediately enter the collected responses into the IBM SPSS ISA system.

#### **4. Why We Cannot Use Duplicate Information**

For the evaluation of the SOAR intervention, the nature of the information we collect and the manner in which we collect it precludes duplication. SSA does not utilize another collection instrument to obtain similar data. Surveys which the CJCC Research Analysts administer to participants provide valuable information that the evaluation team cannot gather through SSA's program records.

The purpose of the initial enrollment survey and follow-up surveys is to gather point-in-time information about the respondents' quality of life, mental health status, level of financial freedom, and feelings about the SSI/SSDI application process, aiming to evaluate potential changes over time. The survey data is available in program data; however, we need to collect it for the survey to show the current status (point-in-time data) of the participants.

#### **5. Minimizing Burden on Small Respondents**

This collection does affect small businesses or other small entities.

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

If we did not evaluate the intervention, we would not be to address questions about the potential success of the outreach and assistance to individuals with SPMI who are inmates of county jails. The initial enrollment survey is a one-time collection and necessary to conduct a credible evaluation. The data the CJCC SOAR evaluation team will collect are not available from other sources, and the survey will collect a richer set of information than the evaluation team can gather from program records alone. We only conduct the initial enrollment survey once, therefore, we cannot conduct it less frequently.

The follow-up surveys will collect information that the evaluation team cannot obtain from program records alone. We will conduct two rounds of follow-up surveys. Fewer rounds of the follow up surveys would mean MES's would not be able to respond to participant feedback in real-time, which the initial survey would allow them to do. Collecting two additional surveys six months apart allows enough time to have passed for SSI/SSDI benefits to have impacted the participants' lives and for researchers to compare how having benefits affects participants over a period of time.

#### **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 Consolutions with the Public**

The 60-day advance Federal Register Notice published on March 31, 2023, at 88 FR 19340, and we received one public comment. The 30-day FRN published on June 28, 2023, at 88 FR 41994. 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 revision of this form.

We consulted with the professionals from the State of Georgia, and their contractors ARS, to contribute to the design of the information collection effort for this evaluation.

#### **9. Payment or Gifts to Respondents**

SSA does not provide payments or gifts to the respondents.

#### **10. Assurances of Confidentiality**

The subjects of this information collection and the nature of the information the team will collect require strict confidentiality procedures. SSA will protect the information the CJCC SOAR evaluation 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.

All potential participants should be able to make a genuinely informed decision about participating in the demonstration. The CJCC SOAR evaluation team will obtain the informed consent of each participant through a signed consent form. The consent form also indicates to applicants that participation is voluntary and that agreeing to participate means that they give permission for researchers to access information about them, such as their SSDI benefit status, from other sources. The consent form will make clear the assurances and limits of confidentiality.

SSA and the evaluation team contractors have procedures in place to appropriately safeguard data from unauthorized use and disclosure, including the use of passwords and encrypted identifiers. The CJCC SOAR evaluation team uses several mechanisms to secure data including: obtaining suitability determinations for designated staff; training staff to recognize and handle sensitive data; protecting computer systems from access by staff without favorable suitability determinations; limiting the use of

personally identifiable information in data; limiting access to secure data on a need-to-know basis, and to staff with favorable suitability determinations; and creating data extract files that exclude identifying information.

### 11. Justification for Sensitive Questions

The initial enrollment and follow-up surveys include broad multiple-choice questions about participants’ financial independence and more specific questions regarding their mental health, ability to address mental health issues, quality of life, and other possible impacts of benefits acquisition or other programmatic outcomes. The initial enrollment and the follow-up surveys are necessary to evaluate the effects of the intervention on participants’ financial well-being, mental health, and other quality of life indicators. The survey will not collect data that the evaluation team can obtain directly from other sources. Respondents can decline to respond to questions that they deem too private or sensitive. However, to encourage responses, the introduction to the questionnaire will remind respondents that the study will keep their responses private and that we are not collecting their name or any other identifiable information. Even so, the respondents may perceive these questions as unduly invasive, and these factors can lead individuals to abandon completing the survey and revoking their consent to participate in the evaluation, as they have the right to do, as stated in the IRB-approved informed consent form.

### 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)	Average Theoretical Hourly Cost Amount (dollars)*	Average Wait Time for Teleservice Centers (minutes)**	Total Annual Opportunity Cost (dollars)***
Initial Enrollment Survey (Paper)	90	1	90	19	29	\$12.81*		\$371***
Informed Consent (Paper)	90	1	90	10	15	\$12.81*		\$192***
Follow-up Survey (Internet or Telephone)	90	2	180	23	69	\$12.81*	19**	\$1,614***
<b>Totals</b>	<b>270</b>		<b>360</b>		<b>113</b>			<b>\$2,177***</b>

\* We based this figure on the average DI payments based on SSA's current FY 2023 data (<https://www.ssa.gov/legislation/2022factsheet.pdf>).

\*\* We based this figure on average FY 2023 wait times for teleservice centers (approximately 19 minutes per respondent), based on SSA’s current management information data.

There are no learning costs associated with this program, as DBHDD will explain the program to individuals eligible to participate in the evaluation. In addition, there is no need for any research beyond reading instructions to understand how to comply with any of the information collection tools. The consent form explains the purpose and activities that will be involved if the individual agrees to participate in the evaluation and requires only a signature. The baseline and follow-up surveys ask an individual to provide personal information about themselves.

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 **10, 19,** and **23** minutes accurately shows the average burden per response for learning about the program; receiving notices as needed; reading and understanding instructions; gathering the data and documents needed; answering the questions and completing the information collection instrument; scheduling any necessary appointment or required phone call; consulting with any third parties (as needed); and waiting to speak with SSA employees (as needed). Based on our current management information data, the current burden information we provided is accurate. The total burden for this ICR is **113** burden hours (reflecting SSA management information data), which results in an associated theoretical (not actual) opportunity cost financial burden of **\$2,177**. 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 **\$2,028**. This estimate accounts for costs from the following areas:

<b>Description of Cost Factor</b>	<b>Methodology for Estimating Cost</b>	<b>Cost in Dollars</b>
Printing	Printing Cost	\$45
Distributing, Shipping, and Material Costs for the Form	Distribution + Shipping + Material Cost	\$0*
CJCC Research Analyst administering the information collections	CJCC Evaluation team processing time	\$1,586
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	\$0*
Quantifiable IT Costs	IBM Support Assistant	\$397



	system	
<b>Total</b>		<b>\$2,028</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 cooperative agreement with CJCC.

**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 the burden figures.

**Note:** The total burden reflected in ROCIS is **360**, while the burden cited in #12 of the Supporting Statement is **113**. This discrepancy is because the ROCIS burden reflects the teleservice waiting time. In contrast, the chart in #12 of the Supporting Statement reflects actual burden.

**16. Plans for Publication Information Collection Results**

The team will analyze, tabulate, and report the information collected on the evaluation of the intervention. After SSA reviews it, CJCC will publish the information via written report on their website to communicate results of the program. This data will not identify study jails nor participants. We will write and publish the report at the end of the 5-year grant period. We will present the results and methodologies to our partners, interested parties, and stakeholders.

Time schedule for analysis and reporting:

SSA will conduct semi-annual analysis of the responses. The expected period of data collection is January to June. We will begin data collection starting September 30, 2023, with the initial enrollment survey, at the time individuals consent to participate. We will stop Data collection on September 30, 2026, with follow-up surveys to the latest participants to join the evaluation. The survey collection and reporting schedule is as follows:

Data collection: September 30, 2023 - September 30, 2026

Data analysis: October 1, 2026

Final report: December 2026

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

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.