

**Supporting Statement for
The Ticket to Work and Self-Sufficiency Program
20 CFR 411
OMB No. 0960-0644**

A. Justification

1. Introduction/Authoring Laws and Regulations

This information collection request (ICR) is necessary to administer the Ticket to Work (Ticket) Program authorized under Section 1148 of the *Social Security Act (Act)*. The Ticket Program provides Social Security Disability Insurance (SSDI) and Supplemental Security Income (SSI) recipients with expanded options for access to employment services; vocational rehabilitation services; and other employment-related supports, as they work to decrease dependence on Federal cash benefits. The Ticket Program transitions SSDI and SSI recipients toward independence, by allowing them to receive Social Security payments while maintaining employment under the auspices of the program.

The Social Security Administration (SSA) uses service providers, called Employment Networks (ENs), to support and supervise program participant progress through the stages of Ticket Program participation, such as job searches and interviews; progress reviews; and changes in ticket status. ENs can be private for-profit and non-profit organizations, as well as state vocational rehabilitation (VR) agencies. SSA and the ENs utilize a Ticket Program Manager (TPM) to operate the program and exchange information about Ticket Program participants. Through the TPM, the ENs provide updates on tasks, such as selecting a payment system or requesting payments for helping the recipient achieve certain work goals. The Ticket Program allows SSDI and SSI recipients to choose an EN service provider, who will guide and assist them in reaching their goals to obtain and retain self-supporting employment. 20 CFR 411.100-411.730 of the *Code of Federal Regulations* house the regulations for the Ticket Program, including descriptions of the information collection requirements of the program. Section 205(a) of the *Act* gives the Commissioner of Social Security the authority to establish regulations for the Social Security Administration's programs.

2. Description of Collection

SSA requires ENs to submit multiple types of Ticket Program and participant information, resulting in 20 information collection instruments (described below in categories a-j; if we do not mention a specific form number in connection with a collection, it means we require information in writing with no established form). We also increased automation of payments to ENs. ENs, including state VR agencies, provide the information requested from several of these forms through a web-based Secure Ticket Portal, in lieu of submitting forms. This Portal allows ENs to retrieve reports, and enter and submit information electronically, minimizing the use of paper forms.

SSA offers training to service providers concerning program requirements of the regulations for any information collection form listed below, and for all modalities of collection, even when there is no form. In addition, SSA offers account representatives, and a help line through our TPM to serve as an ongoing resource for any information service provider's may need. If a regulation requires the EN, state VR agency, or a recipient to notify us of something in writing, such as when they want to unassign a ticket, the TPM will accept a written statement from any one of these entities making the request. The TPM will accept the written request by regular mail, fax, or email. In some instances, ENs may also submit the information through the Portal to SSA.

a. Establishing Ticket Assignments and Ticket Use

To establish ticket assignability, prior to the recipient having the ticket assigned to an EN or using it with a state VR agency, the EN may contact the TPM to find out whether the recipient is eligible to use the ticket per *20 CFR 411.140(d)(2)*. For initial requests, the EN or state VR agency may use the Ticket Portal. No matter which method the ENs use to obtain the eligibility report, they must provide the TPM with their Dun and Bradstreet Number, as well as the recipient's SSN, and, in the case of live communication, the recipient's name.

Once the ENs establish ticket assignability, there are various ways Ticketholders may use their tickets with a service provider. Each way requires the service provider, which is either an EN or a state VR agency, to send the TPM information signifying the relationship established between the agency and the Ticketholder.

Form SSA-1365, State Agency Ticket Assignment Form – Sections *20 CFR 411.140(d)(3)*, *411.150(b)(3)* and *411.325(a)* require the state VR agency to submit information establishing the ticket assignment using the form we prescribe. This brief form is essentially a signed statement that the state VR agency developed an individualized plan for employment toward which the Ticketholder and the agency agree to work on.

Form SSA-1370, Individual Work Plan (IWP) – Sections *20 CFR 411.140(d)(3)*, *411.150(b)(3)* and *411.325(a)*, require ENs (except state VR agencies acting as ENs) to submit an IWP to solidify a ticket assignment, or reassignment, and to inform SSA of amendments to the IWP. The IWP outlines the Ticketholder's employment goals and the services the EN agrees to provide to help meet the goals and other information as described in *20 CFR 411.465*.

Electronic Data Sharing – Amendments to the Ticket to Work and Self-Sufficiency Program in *20 CFR 411.166* and *411.170(b)* created a new ticket status called the "Cost Reimbursement Option" for when the Ticketholder is using the ticket with the state VR agency under the traditional

cost reimbursement payment method (i.e. the state VR agency is not acting as an EN). We cannot assign tickets in this status to an EN while the state VR agency has the case open. In support of this policy, we ask state VR agencies to inform us when Ticketholders work with them under this option. Instead of an individual paper form, they upload a file to the Portal monthly. This file contains the names and Social Security numbers of all the Ticketholders with whom they began working under this option during the reporting period, and the effective date of the individualized plan for employment, which signifies the date the ticket is officially in-use with the state VR agency.

- b. Requesting Ticket Unassignments and Notifying of VR Case Closures
Sections 20 *CFR* 411.145 and 411.325 require the recipient or the service provider who wants to take a ticket out of assignment to notify the TPM. Likewise, in connection with the regulatory amendment mentioned in a. above, to support 20 *CFR* 411.535(a)(1)(iii), the state VR agency should inform SSA when it closes the case of a Ticketholder that the state VR agency was serving under the cost reimbursement option. These notifications are important to monitor participation in the program, and to accurately reflect the ticket status of recipients who are eligible to participate in the Ticket to Work Program and the periods of service for which we may credit an EN or state VR agency.
- c. Tracking Progress
SSA may not initiate a medical Continuing Disability Review (CDR) while a recipient is using a ticket. If a Ticketholder assigned the ticket or is using the ticket with the state VR agency under the cost reimbursement option, at the conclusion of each 12-month period of ticket use, we request the recipient or the service provider to certify whether the Ticketholder is making the expected progress. Months in which the ticket is in inactive status do not count towards the 12-month periods of ticket use for timely progress. There are three information collections associated with this provision.

Request to Place Ticket in Inactive Status – Section 20 *CFR* 411.192(b) and (c) permits a Ticketholder to request in writing that SSA deactivate and reactivate the ticket during a period in which the Ticketholder becomes temporarily unable to make timely progress toward self-supporting employment. Upon receiving such a request, the TPM transmits updated information to SSA so the inactive or reactivated ticket status will take effect. This information is important so the recipients do not continue their exemption status from receiving a medical CDR while the ticket is inactive, and so they regain exempt status when we reactivate the ticket.

Form SSA-1375, Requests for Certification of Work and Educational Progress – Section 20 *CFR* 411.200(b) indicates that if SSA's administrative records do not show the Ticketholder met the work or educational requirement for the timely progress period, the TPM will request the Ticketholders complete

Form SSA-1375 to let us know whether they met the progress requirements for the period.

Note: We resend Form SSA-1375 if the Ticketholder responds with insufficient information, allowing the recipient a final opportunity to certify progress with work and earnings before an adverse decision takes effect.

Request to reenter Ticket-Use Status after Not Making Timely Progress – Section 20 *CFR* 411.210(b) requires the Ticketholder to send a written request for reinstatement to in-use status after not meeting the timely progress criteria. The TPM will decide if the Ticketholder met the applicable requirements. If so, the TPM transmits the updated ticket status change, and the recipient once again becomes exempt from a medical CDR.

d. Selecting a Payment System

Section 20 *CFR* 411.505 requires ENs to make their selection of a payment system at the time they enter into contract with SSA. Section 20 *CFR* 411.365 requires state VR agencies to send the TPM a letter telling us which EN payment system they choose when functioning as an EN. Amendments to the Ticket to Work and Self-Sufficiency Program in 20 *CFR* 411.515 allow ENs and state VR agencies acting as ENs to change their EN payment system election once in each calendar year. We use the elections and time periods they cover to identify the method of payment appropriate for compensating an EN or state VR agency when they file a request for payment under an EN payment system.

e. Reporting Referral Agreement Activity

Sections 20 *CFR* 411.400 – 411.420 explain that ENs and state VR agencies may have individual and broad-based agreements covering ENs' referral of recipients, whose ticket assignments they hold, to state VR agencies for services. Section 20 *CFR* 411.325(d) and 411.415 require ENs to submit the agreements to the TPM for verification prior to referring recipients to the state VR agencies.

f. Requesting EN Payments

Section 20 *CFR* 411.575 requires ENs seeking milestone and outcome payments, including a state VR agency acting as an EN, to send a request for payment to the TPM for each milestone or outcome payment attained. The payment request must include evidence of the Ticketholder's work and earnings and or other documentation as required.

Form SSA-1391 is the Employment Network Payment Request Form. An EN may submit it with a SSA-1389 or SSA-1398 as necessary depending on the type of payment request. ENs usually use the Ticket Portal to select and transmit the Earnings Inquiry Request or the payment request information.

Split Payment Situations – in situations where more than one EN is eligible for a payment for the same period, per *20 CFR 411.560* and *411.581*, the ENs may submit an SSA-1401 asking the TPM to determine a split in payment or propose a split in payment, upon which the ENs have agreed. The TPM must approve the split payment percentages.

g. Reporting Periodic Outcomes

Section *20 CFR 411.325(f)* provides that ENs must prepare periodic reports about their organizations. These annual reports contain information such as staffing size and experience, and the services the EN provides Ticketholders.

The Proof of Relationship (POR) form is to be submitted by ENs to TPM. This form will be used by TPM to verify that ENs are maintaining relationships with and providing services to their Ticketholders during the early stages of employment.

The Certification of Services (COS) form is to be submitted by ENs to TPM. This form will be used by TPM to verify that ENs are providing services to their Ticketholders per their IWP.

The Annual Performance Outcome Report (APOR) will be submitted annually to TPM by ENs to report staffing and servicing information to SSA.

The Ticket Portal captures outcome information from ENs.

h. Dispute Resolution

The Ticket Program provides a mechanism for dispute resolution when disputes involve recipients, the TPM, ENs, or state VR agencies. Section *20 CFR 411.435* provides that under certain circumstances, ENs and state VR agencies that have a dispute related to an agreement between the two agencies may request the TPM to recommend a dispute resolution. Sections *20 CFR 411.615* and *411.625* provide that a recipient or EN may advance a dispute resolution request to the TPM and then to SSA.

i. EN Contract Changes

ENs must enter into an agreement with SSA per Section *20 CFR 411.320*. After becoming an EN, if an organization wishes to make changes to certain information it provided, it should make the change using the Ticket Portal, or using the Change Form SSA-1374.

j. Feedback on Ticketholder events

Work Incentive Seminar Events (WISE) are webinars that allow speakers to share information about the Ticket Program and Social Security work incentives with audience members who include Social Security beneficiaries/recipients and their family members, community partners and EN

staff. SSA plans to conduct monthly WISE webinars. To ensure WISE events are providing effective and quality service, we need to assess the levels of understanding and awareness that participants gain from attending these events. Additionally, SSA seeks to know if different aspects of the events meet the participants' needs.

This survey will ask participants to rate the experience provided by the WISE events as it pertains to their ability and desire to participate in the TTW program. We will use the WISE Webinar Surveys to garner feedback on online events.

The respondents for these collections in a-i above are the ENs, and by extension, the Ticket Program participants from whom they obtain information to complete the collections.

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

We created a secure Ticket Portal, which allows our Ticket providers to electronically complete actions, and report to SSA. The Ticket Portal makes collections described in #2 above available electronically. Most of our providers use the Ticket Portal to perform the majority of their actions and data sharing activities. SSA requires all ENs to use the Ticket Portal.

All of the forms available on the Ticket to Work website are to be sent electronically to SSA and or TPM. These forms include the Ticket Unassignment form, 1391, 1401, POR, 1389, 1374, 1365, 1370, 1375, 1398.

We use the WISE Webinar Surveys to garner feedback on online events.

We use the APOR to ensure that we have the most up-to-date information about the ENs, their employees certifications, and the services they provide Ticketholders.

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. As of August 2021, there are 507 ENs under contract with SSA, most of which are small businesses. The majority of ENs submit their information and data through the Ticket Portal.

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

If we did not collect this information, we would not comply with some aspects of the Ticket to Work legislation, which may adversely affect the cost of operating

the program. In addition, if SSA collected this information less frequently, we would not be able to adequately monitor activities affecting recipients within the program. These information gaps could lead to less than adequate oversight of program compliance. There are no technical or legal obstacles to burden reduction.

7. **Special Circumstances**

To manage the Ticket to Work Program, SSA must have up-to-date information concerning ticket assignments and unassignments, and the status of tickets under the cost reimbursement option with state VR agencies. Therefore, service providers must report this information to us as close to the date of the action as possible. Quarterly reporting would be insufficient.

8. **Solicitation of Public Comment and Other Consultations with the Public**

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.

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**

This 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	Average Burden Per Response (minutes)	Estimated Total Annual Burden (hours)	Average Theoretical Hourly Cost Amount (dollars)*	Total Annual Opportunity Cost (dollars)**
a) 20 CFR 411.140(d)(2)/ Interactive Voice Recognition Telephone	6,000	1	3	300	\$15.43*	\$4,629**
a) 20 CFR 411.140(d)(2)/	91,484	1	2	3,049	\$15.43*	\$47,046**

Ticket Assignment via Portal						
a) 20 CFR 411.140(d)(3), 411.150(b)(3) and 411.325(a) / State Agency Ticket Assignment Form/ SSA-1365	948	1	15	237	\$15.43*	\$3,657**
a) 20 CFR 411.140(d)(3); 411.325(a); 411.150(b)(3); 20 CFR 411.465. / Individualized Work Plan/ SSA-1370	26,007	1	60	26,007	\$15.43*	\$401,288**
a) 20 CFR 411.166; 411.170(b)/ Electronic File Submission	4,104	1	5	342	\$15.43*	\$5,277**
b) 20 CFR 411.145; 411.325/ Requesting Ticket Unassignments	2,494	1	15	624	\$15.43*	\$9,628**
b) 20 CFR 411.535(a)(1)(iii)/ Notification of VR Case Closures via Portal	136,478	1	11	25,021	\$15.43*	\$386,074**
c) 20 CFR 411.200(b)/ Requests for Certification of Work and Educational Progress/ SSA-1375	179	1	30	90	\$15.43*	\$1,389**
d) 20 CFR 411.505/ Selecting a Payment System	33	1	10	6	\$15.43*	\$93**
e) 20 CFR 411.400 – 411.420; 20 CFR 411.325(d) and 411.415/ Reporting Referral	31	1	15	8	\$15.43*	\$123**

Agreement Activity						
f) 20 CFR 411.575/ Requesting EN Payments/SSA- 1391 or SSA-1398	1,704	1	40	1,136	\$15.43*	\$17,528**
f) 20 CFR 411.560 and 411.581/ Requesting Split Payment / SSA-1401	5	1	20	2	\$15.43*	\$31**
g) 20 CFR 411.325(f) /Proof of Relationship	6,870	1	20	2,290	\$15.43*	\$35,335**
g) 20 CFR 411.325(f)/ Certification of Services	2,438	1	20	813	\$15.43*	\$12,545**
g) 20 CFR 411.325(f)/ Annual Performance Outcome Report	507	1	15	127	\$15.43*	\$1,960**
h) 20 CFR 411.435, 411.615, and 411.625/ Dispute Resolution	196	1	120	392	\$15.43*	\$6,049**
i) 20 CFR 411.320/EN Contract Changes/ SSA-1374	929	1	5	77	\$15.43*	\$1,188**
j) 20 CFR 411.200(b)/ WISE Webinar Registration Page	4,000	1	3	200	\$15.43*	\$3,086**
j) 20 CFR 411.200(b)/ WISE Webinar Survey	1,776	1	3	89	\$15.43*	\$1,373**
Totals	286,183		60,810			\$938,299**

* We based these figures by averaging the average hourly wages for Social and Human Service Assistants (<https://www.bls.gov/oes/current/oes211093.htm>); Rehabilitation Counselors (<https://www.bls.gov/oes/current/oes211015.htm>); and the average DI payments average DI payments based on SSA's current FY 2021 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.**

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 the **3 to 120** minutes accurately shows the 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 **286,183** burden hours (reflecting SSA management information data), which results in an associated theoretical (not actual) opportunity cost financial burden of **\$938,299**. 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 to the respondents.

14. **Annual Cost To Federal Government**

The annual cost to the Federal Government is approximately **\$7,220,264** . 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	\$10,264*
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-09 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	0*
Quantifiable IT	Any additional IT costs	0*

Costs		
Other	TPM contract information collections	\$7,210,000*
Total		\$7,220,264 *

* 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. It is difficult for us to break down the cost for processing a single form, 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 2019, the burden was 84,440 hours. However, we are currently reporting a burden of 60,810 hours. This decrease stems the agency reducing some data collections and increasing automation through the portal. These figures represent current Management Information data.
16. **Plans for Publication Information Collection Results**
SSA will not publish the results of these information collections.
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. Collection of Information Employing Statistical Methods

SSA does not use statistical methods for these information collections.