

Supporting Statement for Form Number SSA-4290-F5
Development of Participation in a
Vocational Rehabilitation or Similar Program
20 CFR 404.316(c), 404.337(c), 404.352(d), 404.1586(g), 404.1596, 404.1597(a), 404.327,
404.328, 416.1321(d), 416.1331(a)-(b), and 416.1338, 416.1402
OMB No. 0960-0282

A. Justification

1. Introduction/Authoring Laws and Regulations

The Ticket to Work and Self-Sufficiency Program allows recipients of Title II benefits and Title XVI Social Security Administration (SSA) disability payments to continue receiving payments while enrolled in a qualifying vocational rehabilitation, or other job-training program. SSA implemented the provisions for this program in Sections 404.316(c), 404.327, 404.328, 404.337(c), 404.352(d), 404.1586(g), 404.1596, 404.1597(a), 416.1321(d), 416.1331(a)-(b), and 416.1338 of the *Code of Federal Regulations*. The aforementioned provisions provide that disability recipients, whose disability has ceased and who are still enrolled in a vocational rehabilitation or other job-training program, may continue to receive benefits. These sections require proof of the disability recipient's enrollment in a vocational rehabilitation or job-training program. We use Form SSA-4290-F5, the Development of Participation in a Vocational Rehabilitation (VR) or Similar Program, for that purpose. Sections 225(b)(2) and 1631(a)(6) of the *Social Security Act (Act)* provide the statutory authority for use of this form. Regulatory authority for use of this form stems from 20 CFR 404.316, 404.337, and 404.352; 404.1586, 404.1596, and 404.1597; 416.1321, 416.1331, and 416.1338; and 416.1402 of the *Code of Federal Regulations*.

2. Description of Collection

To confirm that an individual is participating in a vocation rehabilitation program, employment, or support service SSA requires certain information about the recipient, their program participation, and the services they receive. SSA uses Form SSA-4290-F5 to collect this information, and to make a determination regarding continued entitlement to benefit payments. Respondents learn of the possibility for benefits via Agency mailers, multi-media commercials and advertising, SSA's general website, a link from the [mySocial Security](#) landing page, as well as from other individuals. SSA is constantly reviewing our outreach tactics to assure maximum exposure and accessibility to necessary individuals. SSA's website and mailers list the information respondents need to apply for this benefit. To determine whether a beneficiary will continue to be eligible for benefits, individuals receiving Social Security Disability Insurance (SSDI) benefits under Title II or Supplemental Security Income (SSI) benefits under Title XVI, have a periodic Title II Continuing Disability Review (CDR) or, in the case of SSI recipients turning 18, an "Age-18 Redetermination." Individuals selected to undergo a Continuing Disability Review (CDR) must complete Form SSA-454-BK, or the Internet i454 (OMB No. 0960-0072) and, SSI recipients

turning 18 complete the SSA-3368-BK (OMB No. 0960-0579) for Age-18 Redeterminations. These forms include a question asking whether the beneficiary is participating in any vocational rehabilitation, employment, or other support services; the beneficiary may also indicate that they are age 18-21 and participating in an Individualized Education Program (IEP) through school. SSA then transmits the CDR or redetermination to the DDS (Disability Determination Services) for a medical determination. If the DDS determines that the beneficiary has not medically improved (known as a “medical continuance”), SSA closes the CDR or redetermination, and the beneficiary continues to receive benefits. However, if the DDS determines that the beneficiary has medically improved, then the DDS notifies the SSA Field Office (FO) of the medical cessation. In the case of a medical cessation, an individual may continue to receive Disability Benefits if they affirmatively responded to the questions pertaining to enrollment in a vocational rehabilitation program, employment, or support service, during the CDR or redetermination. To confirm that the individual is participating in a vocation rehabilitation program, employment, or support service we require certain information about the recipient, their program participation, and the services they receive; SSA uses Form SSA-4290-F5 to collect this information. The FO uses information provided on the beneficiary’s CDR or redetermination form, to complete the first section of the SSA-4290-F5. The FO then contacts the provided education institution, state vocational rehabilitation agency, employment network, or other provider of rehabilitation services provided on the form. If the beneficiary is actively receiving services from the applicable program, and we determine that the individual’s completion of [or continuation in] the program, will increase the likelihood that the individual will not return to the disability or blindness benefit rolls, SSA allows the recipient to continue to receive benefits. However, SSA ends the recipient’s benefits when the individual completes the program, stops participating in the program, or we determine that their continued participation in the program will no longer increase the likelihood that the individual will not return to the disability or blindness benefit rolls.

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

- **Psychological Cost #1:**
 - **Requirement for the Program:** The SSA-4290-F5 asks respondents to provide information about an individual’s participation in vocational rehabilitation or similar program.
 - **Psychological Cost:** The respondent may find these questions as unduly invasive and be concerned about whether or not answering the questions will negatively affect the individual who receives the benefits.

We understand these psychological costs may cause respondents to delay their completion of the information collection or cause them to abandon the information collection entirely. However, we require full completion of this

collection to receive benefits. Therefore, we have taken this potential psychological cost into account when calculating our burden in #12 below.

The respondents are State employment networks, vocational rehabilitation agencies, or other providers of educational or job training services, or similar programs.

3. Use of Information Technology to Collect the Information

SSA's current procedure is to contact the respondents by telephone to complete the form. If we are unable to reach the respondent by telephone, an SSA technician mails the form, for the respondent to complete and return to SSA by mail. SSA is unable to create an Internet version of this information collection at this time, as we pre-fill information prior to send it, and only a small number of respondents complete the form annually. We will reassess the possibility of creating an electronic version of this form in the future, when we have the resources to dedicate to electronic submission for this smaller-scale form. In addition, we evaluated this collection for conversion to a submittable PDF, and found it is not suitable for that process either, due to limited resources, limited use and agency priorities, and pre-filled information. Therefore, the SSA-4290 is not a suitable candidate to seek funding for an electronic version at this time. As mentioned above, we will reassess our options for electronic submission in the future.

4. Why We Cannot Use Duplicate Information

The information we collect and the manner in which we collect it, makes duplication impossible. SSA does not use another collection tool 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

SSA uses the information from form SSA-4290-F5, to determine if a beneficiary, whose disability payments has ceased, can continue to receive benefits based on participation in an approved program. If we do not collect the information, the DDS would be unable to make a determination for payment continuation. Because we collect this information on an as needed basis, we cannot collect it less frequently. 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 13, 2024, at 89 FR 18471, and we received no public comments. The 30-day FRN published

on May 30, 2024, at 89 FR 46945. 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 payment or gifts to the respondents.

10. Assurances of Confidentiality

In accordance with the rules in 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, SSA protects and holds confidential the information it collects.

11. Justification for Sensitive Questions

As stated in #2 above, we need to ask some questions which some respondents may perceive as unduly invasive and be concerned whether or not answering the questions will negatively affect the individual. These include questions regarding the individual’s participation in vocational rehabilitation or similar programs. As such, this information collection may have psychological costs pertaining to collection of personal questions (which we also discussed in #2 above). However, we must ask these questions to evaluate the effects of the VRFD on the participants financial well-being and physical health.

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)*	Average Wait Time for Teleservice Centers (minutes)**	Total Annual Opportunity Cost (dollars)***
SSA-4290-F5 (By mail)	2,400	1	40	1,600	\$21.27*		\$34,032***
SSA-4290-F5 (Telephone)	600	1	30	300	\$21.27*	19**	\$10,422***
Totals	3,000			1,900			\$44,454***

*We based this figure on average Social and Human Service Assistant’s hourly salary, as reported by(<https://www.bls.gov/oes/current/oes211093.htm>).

** We based this figure on the average FY 2024 wait times for teleservice centers, based on SSA’s current management information data.

*** 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 calculated the following Learning Cost time burden based on the estimated time and effort we expect respondents will take to learn about this program, its applicability to their circumstances, and to cover any additional research we believe respondents may need to take to understand how to comply with the program requirements (beyond reading the instructions on the collection instrument):

Total Number of Respondents	Frequency of Response	Estimate Learning Cost (minutes)	Estimated Total Annual Burden (hours)	Total Annual Learning Cost (dollars)****
3,000	1	15	750	\$15,953****

**** We based this dollar amount on the Average Theoretical Hourly Cost Amount in dollars shown on the burden chart above.

NOTE: We included the total opportunity cost estimate from this chart in our calculations when showing the total time and opportunity cost estimates in the paragraph below.

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 **30** minutes and **40** 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 collection instrument is **1,900** burden hours (reflecting SSA management information data), which results in an associated theoretical (not actual) opportunity cost financial burden of **\$60,407**. 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 **\$32,069**. This estimate accounts for costs from the following areas:

Description of Cost Factor	Methodology for Estimating Cost	Cost in Dollars*
Designing and Printing	Design Cost + Printing	\$1,890

the Form	Cost	
Distributing, Shipping, and Material Costs for the Form	Distribution + Shipping + Material Cost	\$1,872
SSA Employee (e.g., field office, 800 number, DDS staff) Information Collection and Processing Time	GS-9 employee x # of responses x processing time	\$27,862
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	\$445
Quantifiable IT Costs	Any additional IT costs	\$0*
Total		\$32,069

* 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. First, since we work with almost every US citizen, we often do bulk mailings, and cannot track the cost for a single mailing. 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 2021, the burden was 750 hours. However, we are currently reporting a burden of 1,900 hours. This change stems from an increase in the completion time from 15 minutes (by phone) to 40 minutes (by mail) and 30 minutes (by phone). We believe this is a better estimate for the respondent to gather information, read the instructions, and complete the form.

Note: The total burden reflected in ROCIS is **2,990**, while the burden cited in #12 of the Supporting Statement is **1,900**. This discrepancy is because the ROCIS reflects the teleservice wait time + learning costs. In contrast, the chart in #12 of the Supporting Statement reflects actual burden.

16. Plans for Publication Information Collection Results

We do not plan to publish the information collection results.

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.

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.