

Supporting Statement for Sheltered Workshop Wage Reporting
OMB # 0960-0771

A. Justification

1. Introduction/Authoring Laws and Regulations

SSA uses Sheltered Workshop Wage Reporting to collect wage information for SSI recipients directly from sheltered workshops. Section 1631(e)(1) requires SSA to obtain proof, as necessary, to assure that we pay benefits to eligible individuals only. Section 1612(1)(C) of the *Social Security Act (Act)* and 42 USC 1382a of the *U.S. Code* define remuneration received for services performed in a sheltered workshop as earned income for the Supplemental Security Income (SSI) program. The amount of monthly wages determines an individual's SSI payment amount.

2. Description of Collection

Sheltered workshops are private non-profit organizations or institutions that implement a recognized program of rehabilitation for handicapped workers, or provide such workers with remunerative employment or other occupational rehabilitative activity of an educational or therapeutic nature. Sheltered workshops perform a service for their clients by reporting monthly wages directly to SSA; however, participation in the Sheltered Workshop Wage Reporting tool is voluntary. SSA partners with community organizations through outreach activities. Sheltered workshops generally learn about this tool and receive training on how to use it from their local field offices. Sheltered workshops are motivated to report wages voluntarily as a service to their clients. SSA uses the information these workshops provide to verify and post monthly wages to the SSI recipient's record. Most workshops report monthly wage totals to their local SSA office, so SSA can adjust the client's SSI payment amount in a timely manner and prevent overpayments. Wage information received through the electronic tool generally requires fewer manual actions by FO staff to transmit the information into SSA systems, which fosters timely posting and prevents improper payments. Workers do not provide specific authorization to participate in this service; however, SSA collects authorization that covers the release of this information via a version of the SSA-8510 "Authorization For The Social Security Administration To Obtain Personal Information" (OMB No. 0960-0801) within the electronic SSI Claim system. .

There are no psychological cost to the respondents. Respondents are sheltered workshops that report monthly wages for services performed in the workshop.

3. Use of Information Technology to Collect the Information

In accordance with the agency's Government Paperwork Elimination Act plan, SSA created an Internet version of the Sheltered Workshop Wage Reporting System. SSA offers an electronic option for reporting sheltered workshop wages through Government-to-Government Services Online. Clearance Package OMB

No. 0960-0757 (Form SSA-159, Government to Government Services Online (GSO) Website Registration; Form SSA-160, Government to Government Services Online Website Account Modification/Deletion) clears the registration process for the Government-to-Government Service Online. Sheltered workshops upload a plain text extract file to the GSO service. The file contains wage information for all participants on a single report. Within the GSO service, the respondent can select SSA in a drop down box, but there is no option to select a specific office. While importing the file from GSO, SSA determines the appropriate jurisdictional office to handle the report. Based on our data, 100% of respondents under this OMB number 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 preclude 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

If we did not collect this information, we would risk increased instances of improper payments. Sheltered Workshop reporting reduces the number of overpayments SSI recipients incur by providing SSA with timely and accurate wage reports. Processing these wage reports electronically reduces the cost of administering the program. Because we collect the 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 September 12, 2024, at 89 FR 74351, and we received no public comments. The 30-day FRN published on November 6, 2024, at 89 FR 88105. 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	Total Number of Responses	Average Burden per Response (minutes)	Estimated Total Annual Burden (hours)	Average Theoretical Hourly Cost Amount (dollars)*	Total Annual Opportunity Cost (dollars)***
Sheltered Workshop Wage Reporting	244	12	2,928	15	732	\$23.28*	\$17,041***

* We based this on average Rehabilitation Counselors hourly salary, as reported in Bureau of Labor Statistics data ([Rehabilitation Counselors \(bls.gov\)](https://www.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 15 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 732 burden hours (reflecting SSA management information data), which results in an associated theoretical (not actual) opportunity cost financial burden of \$17,041. 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 \$85,496. 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-09/05 (\$28.73) employee x # of responses (2,928) x processing time (avg. 60 minutes)	84,121
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	1,375
Quantifiable IT Costs	Any additional IT costs	\$0*
Total		\$85,496

* 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 do not track design costs or upkeep costs (as these are based on employee time and may vary from collection to collection). 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. Finally, SSA prefers not to provide breakdowns of estimated payment to employees who process these items for a variety of reasons (only one of which is that it is not possible to do this entirely accurately).

15. **Program Changes or Adjustments to the Information Collection Request**
When we last cleared this IC in 2020, the burden was 2,400 hours. However, we are currently reporting a burden of 732 hours. This change stems from a decrease in the number of responses from 9,600 to 2,92, due to fewer shelter workshops reporting monthly wages for services performed in the workshop. 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**
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).

B. Collections of Information Employing Statistical Methods

SSA does not use statistical methods for this information collection.