

**Supporting Statement Part A for SSA Beyond Benefits Study (BBS) Data Collection
OMB No. 0960-NEW**

A. Justification

1. Introduction/Authoring Laws and Regulations

Section 234 of the *Social Security Act (Act)* gives the Social Security Administration (SSA) authority to conduct research and demonstration projects designed to test Social Security Disability Insurance (SSDI) program changes and benefit rules that may encourage disabled beneficiaries to work. Similarly, *Section 1110* of the *Act* allows SSA to conduct demonstrations of the Social Security Income (SSI) program and early intervention demonstrations.

2. Description of Data Collection

The objective of the Beyond Benefits Study (BBS) is to understand the needs (e.g., service, medical and employment) of individuals who, due to medical improvement, have “exited” (known as Exiters) or are likely to “exit” (known as Possible Exiters) the SSDI program, the Supplemental Security Income (SSI) program, or both. SSA hired Westat to conduct the BBS. Findings from the study will provide SSA with information to identify potential interventions and policies to help Exiters and Possible Exiters achieve sustainable, substantial work leading to self-sufficiency.

The study aims to answer three primary research questions:

1. What are the service, medical, and employment needs required to achieve sustainable, substantive employment among individuals who exit SSDI/SSI programs?
2. What types of services, resources, and interventions will help individuals exiting SSDI/SSI programs become and remain employed; should SSA consider testing in a larger study?
3. What policy recommendations will facilitate substantive and sustainable employment among individuals who exist SSDI/SSI programs?

The above overarching research questions dictate the focus of data collection, inform types of data collection activities needed, and drive the analysis of data collected. Our mixed-methods approach includes:

- Qualitative data collection through interviews and focus groups;
- Survey responses from a representative sample of Exiters/Possible Exiters; and
- Motivational Interviewing (MI) pilot test.

Qualitative data collection. Qualitative data collection will include both in-depth interviews and focus groups with key populations of interest. Qualitative data collection will consist of the following five components:

1. In-depth interviews with Exiters and Possible Exiters (N=70 individuals),
2. Focus groups with Exiters and Possible Exiters (10 groups, 140

- individuals),
3. Focus groups with vocational service providers (2 groups, 20 individuals),
 4. In-depth interviews with state and agency leadership (30 individuals), and
 5. Focus group with motivational interview practitioners (1 group, 5 individuals).

In-depth interview guides with Possible Exiters (see Attachment A-1) and Exiters (see Attachment A-2) as well as focus group guides with Possible Exiters (see Attachment A-3) and Exiters (see Attachment A-4) include key domains of experience applying for benefits; health; disability income; employment; social and other support; and desire for transition supports. The key domains for the focus group guide with service providers (see Attachment A-5) are: experience with this population; services provided and outcomes; challenges and facilitators; and training and technical assistance needs. Lastly, the key domains for the in-depth interviews with state and agency leadership (see Attachment A-6) include experience with policy, funding and programming, and recommendations for SSA. The focus group with the motivational interview practitioners (see Attachment A-7) will aim to learn more about the feasibility of the pilot as well as best practices to pursue.

The respondents for the qualitative data collection activities includes current beneficiaries, previous beneficiaries, service providers, state leaders, and motivational interviewers.

Survey. The purpose of the survey (see Attachment A-8) is to gather information that is not available in SSA program records or through the Continuing Disability Review (CDR) process about the needs (service, medical, and employment) of Exiters and Possible Exiters from the SSDI and SSI disability programs after a determination of medical improvement. The survey will collect data from a representative sample of 4,000 Exiters and Possible Exiters, including 2,000 Possible Exiters, 1,000 Short-term Exiters (have exited within the last year), and 1,000 Long-term Exiters (exited within the last 1-5 years). We anticipate an average response time of 50 minutes. The survey will collect data to:

1. Identify demographic and other personal characteristics not already recorded in SSA program data,
2. Assess the target population's employment barriers (e.g., transportation, housing, training, or disability accommodation), and
3. Identify any unmet needs pertaining to securing sustained and substantial work.

The information collected from this survey will assist SSA in identifying potential interventions and inform policy recommendations that will help this population achieve sustainable, substantial work leading to self-sufficiency.

The key domains for the survey include:

- Personal history and identity, including demographic factors and justice involvement;
- Health and healthcare, including general health status, mental and physical health status, disability status, and health insurance status;
- Work and economic stability, including employment status, income and earnings, work-related benefits, barriers to work and utilization of special equipment, work-related accommodations and supports, motivation to work questions; and,
- Social and community context, including living situation, social support, knowledge of and utilization of public programs and supports, household composition and household income, and unpaid activities.

Although we will encourage participants to complete a web version of the survey upon initial contact, in subsequent telephone contacts to non-responders we will offer the computer assisted telephone interviewing (CATI) administration mode. This design minimizes some of the barriers that often make survey participation challenging for those with cognitive and physical impairments.

The respondents for the survey include current and previous beneficiaries for our SSI and SSDI programs.

Motivational Interviewing (MI) Pilot. SSI/SSDI benefit Exiters (N=50) are invited to take part in the MI Pilot. MI Pilot participants will take part in up to six sessions. We require participants to attend at least two sessions. We will replace participants who withdraw after one session with people from the reserve list of potential participants for recruitment. MI focuses on exploring and resolving participant ambivalence to influence change that is consistent with the individual's own goals, values and beliefs. Originally used with individuals who suffer from addictions, today MI is one of most well-recognized tools that counseling professionals use to motivate individuals toward making a change or starting a new activity (e.g., looking for employment or advancing at an existing job) and it is a good tool for identifying the challenges of making change. The combination of MI with other services, such as supported employment, has the potential to help individuals who are leaving disability programs to overcome their ambivalence around seeking employment (Miller & Rollnick, 2013¹). The respondents for the MI Pilot activities include previous beneficiaries.

Recruitment and Consent Procedures

Participant recruitment will include multiple modes of contact. Sample selection will vary by target population.

Exiters and Possible Exiters

¹ Miller, W.R. & Rollnick, S. (2013). *Motivational interviewing: Preparing people change* (3rd ed.). New York: Guilford Press.

SSA will provide Westat with a single sample list of Exiters and Possible Exiters. Westat will select separate random samples for each data collection activity from the single sample list. Sampling criteria will include representation from all SSA geographical regions, representation of different policy regimes and contexts (e.g., States with and without CMS 1115 waivers to pay for employment services and States that are and are not blending and braiding exiting VR and other public funds to pay for employment services). The range of sampling criteria will help SSA determine how to roll out a future demonstration project for a population of Exiters and Possible Exiters. Individuals from the single sample list will not be sampled for more than one of the research activities.

Vocational Service Providers, State Agency Leaders, and Motivational Interviewers

Westat will recruit up to 20 service providers and up to 30 state and agency leaders to gather information about serving Exiters and Possible Exiters and the service and funding challenges for this population. SSA plans to recruit up to five motivational interviewers for the MI Pilot.

Below we describe our recruitment approaches for each data collection.

Qualitative data collection

1. In-depth interviews with Exiters and Possible Exiters (70 individuals).

Westat will utilize the SSA sample list to select Exiters and Possible Exiters for the in-depth interviews. Each selected individual will receive an advance letter package via mail, containing a study invitation letter and a study consent form (see Attachment A-9). The letter will provide an overview of the BBS and the relevant data collection activity. The letter will urge participants to visit the study website or call Westat, if interested. The study website will require a unique login code, where participants will answer questions to confirm their identity, acknowledge receipt of materials, provide consent, read the Privacy Act Statement, and share their contact information and preferred interview time. A Westat study team member will access the study website on behalf of participants who call the Westat study team and ask them the same questions. If necessary, Westat may conduct follow-up phone calls to recruit additional participants (see Attachment A-10).

2. Focus groups with Exiters and Possible Exiters (10 groups, 140 individuals)

Using the SSA sample list, Westat will select Exiters and Possible Exiters for the focus groups. Each selected individual will receive an advance letter package by mail, consisting of a study invitation letter and a study consent form (see Attachment A-11). The letter will provide an overview of the Beyond Benefits Study and the specific data collection activity, inviting participants to visit the study website or contact Westat if interested. The study website requires a unique code for login, where

participants will answer questions to confirm their identity, acknowledge receipt of materials, provide consent, provide contact information, and select a focus group. A Westat study team member will access the study website on behalf of participants who call the study team, and ask the same questions. If necessary, Westat will follow up with potential participants by phone to ensure sufficient recruitment (see Attachment A-12).

3. Focus groups with vocational service providers (2 groups, 20 individuals)

Westat, in collaboration with the Council of State Administrators of Vocational Rehabilitation (CSAVR) and National Employment Network Association (NENA), will identify vocational service providers for recruitment purposes. They will mail advance letter packages, including a study invitation letter and study consent form, to the identified providers (see Attachment A-13). The letter outlines the purpose of the Beyond Benefits Study and the specific data collection activity. The letter requests that providers visit the study website or contact the Westat study team, if interested. The study website requires a unique code for login, and participants answer questions to confirm identity, acknowledge receipt of materials, provide consent, provide contact information, and select a focus group. Providers who contact the Westat study team will answer the same questions with assistance from the team member who accesses the study website on their behalf. Westat will send up to three follow-up emails to providers who have not initiated contact.

4. In-depth interviews with state and agency leadership (30 individuals)

Recruitment for state and agency leadership begins with an introductory email from SSA, alerting potential participants that they may receive an email from Westat for the study. Westat will follow-up within a week, providing an advance letter mailing package with a study invitation letter and consent form via email (see Attachment A-14). The letter explains the purpose of the Beyond Benefits Study and the specific data collection activity. We will ask leaders to visit the study website or contact Westat, if interested. The study website requires a unique code for login, and participants will answer questions to confirm their identity, provide consent, and provide contact information. Leaders calling the Westat study team will answer the same questions, administered by the team member who accesses the website on their behalf. Westat will send up to three follow-up emails to leaders who don't initiate contact.

5. Focus group with motivational interview practitioners (1 group, 5 individuals)

Westat, in collaboration with CSAVR and NENA, will identify motivational interviewer practitioners for recruitment. These practitioners will conduct MI sessions with the exiters. After all the MI sessions

conclude, we will have a focus group with these 5 MI practitioners (see Attachment A-15 for the informed consent).

National Survey

Using the SSA sample list, Westat will select Exiters and Possible Exiters for the survey. The contact protocol for the survey includes four main components:

1. **Initial Invitation Mailing.** Westat will send an initial package containing a letter inviting them to complete a web survey, a study invitation letter, and a hard copy of the study consent form (see Attachment A-16) to all sampled individuals. To maximize response rates from this initial contact attempt, we propose to include a \$2 cash pre-incentive with this mailing. The letter includes the website link and unique access code for interested participants. Additionally, a QR code will be available for respondents to scan using a smart device that will take them directly to the survey, without having to type in the survey website URL.
2. **Reminder Postcard.** At week two, following the initial mailing, Westat will mail nonrespondents a postcard reminder to encourage participation (see Attachment A-17).
3. **Reminder Letter.** At week three, following the initial mailing, Westat will mail nonrespondents a follow-up letter to encourage participation (see Attachment A-18).
4. **Phone Calls to Nonrespondents.** At week four, following the initial mailing, interviewers from Westat's Telephone Research Center (TRC) will initiate phone calls to survey nonrespondents (see Attachment A-19). Westat will contact nonrespondents up to three times by phone, recording all contact attempts in a call log. If Westat does not reach the respondent after three attempts, they will invite other eligible participants from the reserve list.

The study website displays the Privacy Act Statement prior to the collection of any personally identifiable information (PII) (see Attachment A-20). Additionally, we will display informed consent language, and we will require respondents to click on a radio button to acknowledge their agreement before continuing to the survey. As a result, this will electronically document the consent for respondents who complete the survey online. For respondents who complete the survey via telephone, a Westat interviewer will access the website on the respondent's behalf. Trained telephone interviewers will administer the questions over the phone, including reading aloud the informed consent language, obtaining verbal consent, and inputting responses directly into the web instrument. If the respondent agrees, the Westat interviewer will go directly into the survey after the pre-collection questions are answered and documented.

MI Pilot

For the MI pilot, Westat will select only Exiters from the SSA sample list.

Potential participants will receive an introductory letter, a hardcopy consent form, and a brochure describing the pilot by mail (see Attachment A-21). We will ask potential participants to visit the study website, or call the Westat study team if interested. The website requires a unique login code, where participants confirm their identity, acknowledge receipt of materials, provide consent, read the Privacy Act Statement, and select a date and time for their first session. Within a week of mailing, a Westat recruiter will call the Exiters to answer their questions and provide additional information. We will obtain verbal consent over the phone, and the Westat recruiter will work individually with the Exiters to schedule their sessions for the MI pilot.

At the end of the Pilot, Westat will convene a focus group with the five Motivational Interviewers. We will use the focus group findings to assess the feasibility and utility of Motivational Interviewing for this population. Interviewers who participate in the focus group are professionals trained in MI techniques with at least two years of experience providing MI to participants with disabilities. These Motivational Interviewers will receive a letter with consent information and an introduction to the focus group (see Attachment A-15). The respondents of this focus group are the motivational interviewers who conducted the MI Pilot with Exiters.

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

- **Psychological Cost:**
 - **Requirement for the Program:** Participation in the survey is not a requirement of any program and is entirely voluntary. We will ask voluntary participants questions about their experiences learning about SSA programs; applying for programs; undergoing a medical or eligibility review process; and also life goals, needs, and plans if disability is ceased.
 - **Psychological Cost:** The responding Exiters and Possible Exiters may perceive these questions as unduly invasive, and this can lead to individuals choosing to withdraw from the study. The responding Possible Exiters, who are currently undergoing the review process, may be distrustful of the intent of the questions and decide that these questions cause stress, discomfort, or anxiety and therefore choose to delay or abandon the study.

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, responses are voluntary, and we seek this information to identify potential interventions and policies to help future Exiters and Possible Exiters achieve sustainable, substantial work leading to self-sufficiency completion of this collection to evaluate future

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

The respondents for this study are individuals who have volunteered to take part in the study and are exiting (Exiters) or may be exiting (Possible Exiters) SSA's disability program(s) due to medical improvement or changes in eligibility; vocational service providers; state and agency leadership; and motivational interviewers.

3. Use of Information Technology to Collect the Information

Westat will develop a secure and cost-effective web-based Study Management System (SMS) to support data collections for the BBS. The SMS will serve as a centralized mission control center, allowing project staff to monitor and manage data collection activities. It will track participants, send text message reminders (see Attachment A-22), record completion statuses for interviews, focus groups, and surveys, and track incentives. The SMS will also house data collected through the study website. The SMS will not contain Social Security Numbers (SSNs).

A self-administered web instrument survey will allow participants with Internet access to complete it online. Westat telephone data collectors will have access to the online survey, offering participants the option to complete it over the phone at their preferred date and time.

Data collection for the MI pilot will utilize the web-based SMS for real-time data entry and storage. In accordance with the agency's Government Paperwork Elimination Act plan, The Stages of Change Screener for Seeking Competitive Employment and the Interview Session Log will be available electronically and completed during each session (up to 300 times for a total of 50 participants). The Change Assessment Scale: we will collect the Employment Version, Stages of Change worksheets and MI fidelity assessments frequently or for only a portion of pilot participants. The Change Assessment Scale: Westat recruiters will complete the Employment Version with participants, by entering responses directly into Excel. Respondents will complete the Stages of Change worksheets and MI fidelity assessments forms on paper and securely mail them to the Westat office for data entry.

We will store all data, including Employment Change Assessment Scale, focus group recordings, and transcripts, on a secure project network directory with restricted access for designated Westat staff. We will share the Microsoft Teams recordings with the Senior Motivational Interviewer through a secure file transfer protocol (SFTP) site.

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

The information we collect from this study will provide SSA with the data needed to design a useful and policy-relevant demonstration. If SSA did not evaluate the needs of exiters and possible exiters, we would not be able to address important issues regarding exiting beneficiaries' needs in the realms of service, medical, and employment. The information collection is necessary to conduct a credible evaluation and gather data regarding the needs of exiters. The data the evaluation team collects is not available from other sources and will provide information that cannot be found in program records alone or collected through the CDR process. With the exception of the very specific MI pilot interviews, the respondents will only undergo a single interview or focus group; so, they cannot conduct these information collections less frequently.

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 November 15, 2023, at 88 FR 78443, and we received no public comments. The 30-day FRN published on February 12, 2024 at 89 FR 9887. 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 development of this form.

9. Payment or Gifts to Respondents

For qualitative data collection, participants of in-depth interviews with Exiters and Possible Exiters, focus groups with Exiters and Possible Exiters, and the focus group with MI interview practitioners will receive a \$40 Visa gift card by mail.

For the survey, respondents will first receive a \$2 pre-incentive as part of the recruitment process, and respondents who complete the survey will receive a \$40 Visa Gift Card by mail.

For the MI Pilot, participants will receive a \$40 Visa gift card by mail after completing the first MI session. For each subsequent completed sessions, participants will receive \$25 Visa gift cards, for a total of \$165 if they complete all six sessions. SSA believes the monetary gifts are necessary as incentives for completing the surveys, interviews, and the MI pilot.

10. Assurances of Confidentiality

SSA assures respondents of the voluntary nature of the information collection in the informed consent form. Westat maintains a secure environment for data collection, with study materials they store in a restricted access project directory on the Westat network. SSA securely transmits data files through the Government Services Online (GSO) portal, and Westat assigns a data steward to handle the sample file and create participant identifiers. Westat will use special ID keys to link participant data without disclosing SSNs. Westat will store contact information and participant IDs in a password-protected crosswalk spreadsheet on the SMS, accessible only to key project staff. Westat will keep additional documentation with identifying information on a password-protected network drive for select key staff. Westat will securely lock mailing materials with personal contact information in their office. Westat requires their employees to sign confidentiality pledges; attend human subjects protection training; and have background screenings performed. After data collection Westat will provide draft restricted access data files and public use files (PUF) to SSA, with appropriate measures to protect personally identifiable information (PII). Westat will securely transfer session logs and qualitative data to SSA. Upon study completion, Westat will delete data from their network and destroy backup tapes. Once SSA reviews the beneficiary contact information and survey data and has no further questions, Westat will delete the data from their servers.

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 Annualized Burden Hours and Costs

Study Component	Number of Respondents	Frequency of Responses	Average Burden per Response (minutes)	Total Burden Hours	Average theoretical hourly cost amount (dollars)*	Total annual opportunity cost (dollars)**
Interviews with Exiters and Possible Exiters (incl. informed consent and pre-collection questions)	70	1	65	76	\$12.81*	\$974**
Focus groups with Exiters and Possible Exiters (incl. informed	140	1	65	152	\$12.81*	\$1,947**

consent and pre-collection questions)						
Focus group with service providers (icl. informed consent and pre-collection questions)	20	1	65	22	\$24*	\$528**
Focus group with motivational interviewer practitioners (icl. informed consent)	5	1	65	5	\$35*	\$175**
In-depth interviews with state and agency leadership (icl. informed consent and pre-collection questions)	30	1	65	33	\$56*	\$1,848**
Survey (icl. informed consent and pre-collection questions)	4,000	1	50	3,333	\$12.81*	\$42,696**
MI Pilot (icl. informed consent and pre-collection questions)	50	6	60	300	\$12.81*	\$3,843 **
TOTAL	4,315	4,565		3,921		\$52,011**

* We base this figure on average DI payments wages for disability recipients as reported by Social Security Administration data <https://www.ssa.gov/legislation/2023factsheet.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.

Note: Westat will schedule an appointment to call the recipient at their preferred date and time; therefore, the respondents will not incur an average wait time.

The total burden for this ICR is **3,921** burden hours, which results in an associated theoretical (not actual) opportunity cost financial burden of **\$52,011**. 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 **\$2,748,158** for a total of three years. This estimate is a projection of conducting the BBS, including the system and survey programming, administering the data collection activities, analysis, reporting, and data file delivery activities.

Description of Cost Factor	Methodology for Estimating Cost	Cost in Dollars*
Designing and Printing the Form	Design Cost + Printing Cost	\$242,398
Distributing, Shipping, and Material Costs for the Form	Distribution + Shipping + Material Cost	\$30,350
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	\$125,573
Quantifiable IT Costs	Any additional IT costs	\$0*
Other	Project Management, Data Collection, OMB preparation, Analysis, Final Report, Data Files, subcontractor payments	\$2,349,837
Total		\$2,748,158

* 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 used the figures above based on the expected costs from our contract with Westat.

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 updated burden figures.

16. Plans for Publication Information Collection Results

As part of Westat's contract, we will develop a Public Use File containing deidentified data from the survey participants. When the SSA Program Data Disclosure Review Board reviews and approves it for release, we will follow agency protocol and the Public Use File will be posted to the study website at [Beyond Benefits Study | Disability Research | SSA](#).

17. Displaying the OMB Approval Expiration Date

SSA is not requesting an exception to the requirement to display an expiration date. The OMB number and expiration date will be displayed on all public-facing materials used for the study.

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)*.