

**Supporting Statement for  
Protection and Advocacy for Beneficiaries of Social Security (PABSS)  
20 CFR 435.51-435.52  
OMB No. 0960-0768**

**A. Justification**

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

Legislative authority for this grant is in Section 1150 of the *Social Security Act (Act)* as added by Section 122 of *Public Law (Pub.L.) 106-170 (The Ticket to Work and Work Incentives Improvement Act of 1999)*, and amended by Sections 404 and 407 of *Pub.L. 108-203. The Bipartisan Budget Act of 2015* authorizes the continuation of the PABSS. There are 57 Protection and Advocacy (P&A) agencies, one in every State, U.S. Territory, and the tribal nations, as designated by the Governors. The PABSS is one of the nine Federal programs housed in the P&As and funded by Federal agencies including Social Security.

**2. Description of Collection**

The PABSS projects are part of Social Security's strategy to increase the number of Social Security Disability Insurance (SSDI) or Supplemental Security Income (SSI) recipients who return to work and achieve financial independence and self-sufficiency as the result of receiving support, representation, advocacy, or other services. PABSS provides information and advice about obtaining vocational rehabilitation and employment services; and provides advocacy or other services a beneficiary with a disability may need to secure, maintain, or regain employment.

The National Disability Rights Network (NDRN) is a membership organization that holds a contract with Social Security to provide training and technical support to the PABSS grantee organizations and their staff. As part of that contract, NDRN maintains a secure, proprietary internet database that grantees use to submit an annual report reflecting services they provide under PABSS funding. Only P&A staff working on the PABSS grant or our training and technical assistance contractor, NDRN, have access to the database. The contractor generates each grantee's report annually, and sends each report, as well as an aggregate report including the total of all services PABSS grantees provide nationally, to the Social Security Contract Officer and to the Contract Officer's Representative

The PABSS Annual Program Performance Report collects statistical information from each of the PABSS projects in an effort to manage and capture program performance and quantitative data. Social Security uses the information to evaluate the efficiency of the program, and to ensure beneficiaries are receiving quality services. The project data is valuable to Social Security in its analysis of and future planning for the SSDI and SSI programs. The respondents are the 57 PABSS project sites, and recipients of SSDI and SSI programs.

- 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 PABSS data collection system. Based on our data, we estimate 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, SSA would be unable to monitor program activities and outcomes, and could not inform or support related policy development. Grantees collect this information at the point when a beneficiary seeks assistance from the grantee organization and when the P&A organizations complete requested services. Because we collect this information annually, 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 Social Security 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 16, 2019 at 84 FR 48694, and we received no public comments. The 30-day FRN published on December 3, 2019 at 84 FR 66262, and we received no public comment. If we receive any comments in response to this Notice, we will forward them to OMB.
- 9. Payment or Gifts to Respondents**  
Social Security does not provide payment 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	Average Burden per Response (minutes)	Estimated Total Annual Burden (hours)	Average Theoretical Hourly Cost Amount (dollars)*	Total Annual Opportunity Cost (dollars)**
PABSS Program Grantees	57	1	1,440	1,368	\$42.66*	\$58,359**
Beneficiaries	8,284	1	30	4,142	\$10.22*	\$42,331**
<b>Totals</b>	<b>8,341</b>			<b>5,510</b>		<b>\$100,690**</b>

\* We based these figures on average Computer Systems Analyst hourly salary, as reported by Bureau of Labor Statistics data, and average DI payments, as reported in SSA's disability insurance payment 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.**

The total burden for this ICR is 5510 burden hours (reflecting SSA management information data), which results in an associated theoretical (not actual) opportunity cost financial burden of \$100,690. 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 for the PABSS program is approximately \$7,000,000. Of the \$7,000,000.00, we allocate \$275,000.00 to the NDRN contract. NDRN uses an estimated \$40,000 of the \$275,000.00 for technical assistance to the 57 PABSS, database maintenance, and annual collection activities.

## 15. Program Changes or Adjustments to the Information Collection Request

SSA developed our own Internet version of the PABSS data collection, the SSA-4570. Previously, our data collection was housed on our contractor's website, but we decided to remove the collection from their website and create our own version of the form.

When we last cleared this IC in 2016, the burden was 4,199 hours. However, we are currently reporting a burden of 5,510 hours. This change stems from an increase in the completion time for the PABSS Program Grantees from 60 to 1,440 minutes. These figures represent current Management Information data.

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

SSA will not publish the results of the information collection.

**17. Displaying the OMB Approved 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.