

**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, that serve all 50 states, the District of Columbia, U.S. territories, and the tribal nations. Most entities designated as P&A organizations are private non-profit organizations established specifically to carry out P&A programs. However, some P&A organizations operate as part of state government agencies. Additionally, a few P&A organizations are semi-governmental or mixed public-private entities, and a few are housed within civil legal services programs. This nationwide network is dedicated to safeguarding the rights of people with disabilities and ensuring they have access to the resources and supports necessary for full participation in their communities.

2. Description of Collection

The PABSS program safeguards beneficiaries' rights concerning employment and employment conditions and educates them about their employment rights, responsibilities, and entitlement to reasonable accommodations under the Americans with Disabilities Act and other applicable laws. With a focus on promoting greater independence and successful workforce integration, PABSS protects beneficiaries' rights to services such as transportation and access to housing assistance.

The PABSS Training & Technical Assistance (T&TA) contractor provides training and technical support to the P&A organizations and their staff to effectively carry out their advocacy responsibilities under the PABSS program. The contractor provides specialized training on work incentives and employment law, along with technical assistance related to administrative systems, management practices, and other operational areas, all aimed at enhancing the quality and effectiveness of PABSS services. In 2023, SSA awarded the PABSS T&TA contract to the National Disability Rights Network (NDRN); the contract consists of a base year and four option years.

The PABSS program is integral to SSA's strategy to increase the number of Social Security Disability Insurance (SSDI) beneficiaries and Supplemental Security Income (SSI) recipients who successfully return to work and attain financial independence and self-sufficiency. This is achieved through the provision of support, representation, advocacy, and other services that beneficiaries with disabilities may require to secure, maintain, or regain employment.

We use Form SSA-4570, Protection and Advocacy for Beneficiaries of Social Security (PABSS) Annual Program Performance Report (PPR), as the performance report for the PABSS program, specifically to collect detailed information about the activities and outcomes of PABSS programs. This comprehensive data collection tool gathers data on program activities, client demographics, case management, service delivery, outreach efforts, and systemic advocacy activities. Form SSA-4570 documents the strategies used to resolve cases, such as legal remedies, negotiation, and counseling, as well as the status of clients at case closure. Additionally, the form captures information on advocacy efforts and outreach activities.

SSA uses the information we capture on Form SSA-4570 to ensure that PABSS grantees comply with program requirements and contractual obligations. The SSA-4570 is an essential tool for capturing the scope and effectiveness of PABSS programs, supporting SSA's objective to improve employment opportunities for beneficiaries with disabilities. This information enables SSA to monitor program performance, assess effectiveness, and make informed decisions for program planning and management to better support beneficiaries with disabilities in overcoming barriers to employment.

The P&A organizations that receive PABSS grants are responsible for completing Form SSA-4570 and submitting the report based on their program activities during the specified reporting period. To complete the SSA-4570, respondents gather information from their internal records, case management systems, and service documentation. The form includes sections for quantitative data such as the number of clients served, types of benefits received, barriers addressed, and case outcomes, as well as sections for qualitative data such as descriptions of advocacy efforts and outreach initiatives. SSA requires respondents to complete and submit Form SSA-4570 annually, covering a specified fiscal year reporting period.

SSA informs the respondents about the form SSA-4570 and related reporting requirements through official SSA channels, including grant award notifications, training sessions, and direct outreach to P&A organizations.

Respondents use SSA's Web-based Reporting System which will be the primary platform for respondents to complete and submit Form SSA-4570, enabling them to do so directly within a secure digital environment. The SSA-4570 Web-based Reporting System offers an intuitive, user-friendly interface designed to streamline data entry. It provides real-time feedback, promptly alerting users to any missing or inconsistent information as they input data. This proactive approach ensures completeness and accuracy prior to submission. In addition, we integrated automated validation checks to detect and flag discrepancies or errors, thereby maintaining high standards of data quality and consistency.

As the P&A organizations understand through our initial agreements with them that they need to complete the SSA-4570 annually, there are no psychological costs associated with this information collection.

The respondents are the 57 PABSS project sites who collect information on behalf of SSDI and SSI recipients.

3. Use of Information Technology to Collect the Information

SSA created two convenient electronic formats of the SSA-4570 for the respondents to use: the Web-based Reporting System and a fillable, and submittable PDF form.

Web-based Reporting System (Form SSA-4570)

The SSA-4570 Web-based Reporting System is the primary platform all respondents use to complete and submit Form SSA-4570, enabling them to do so directly within a secure digital environment. The web-based portal also allows respondents to generate a completed SSA-4570 PDF based on their responses. PABSS grantees are required to submit a copy of this generated SSA-4570 PDF electronically to SSA's Acquisition and Grants through GrantSolutions, an Internet-based solution, as outlined in the Terms and Conditions of our agreement with them.

The SSA-4570 Web-based Reporting System maintains confidentiality and complies with federal data protection standards, ensuring the safeguarding of sensitive information from unauthorized access. We monitor and control access to the SSA-4570 Web-based Reporting System, and limit it to P&A staff working on the PABSS grant, necessary PABSS T&TA contractor staff, and SSA personnel. To enhance security, the portal requires Multi-Factor Authentication (MFA) to verify user identities prior to granting access, effectively preventing unauthorized entry. Additionally, strong encryption protocols safeguard data during transmission, maintaining the confidentiality and integrity of sensitive information. We store all submitted SSA-4570s using the web-based reporting system in a centralized, secure repository, facilitating efficient access, retrieval, and management to the PABSS T&TA contractor and SSA personnel. The portal incorporates robust data backup and recovery mechanisms to protect against data loss. Furthermore, the centralized repository supports advanced data analytics capabilities, empowering the PABSS T&TA contractor and SSA staff to conduct comprehensive analyses of the submitted reports.

Form SSA-4570 (Fillable PDF)

SSA created a fillable PDF version of the form SSA-4570 for respondents to download, complete, and submit to SSA. PABSS grantees submit the SSA-4570 electronically via email to SSA's PABSS program team and to SSA's Acquisition and Grants through GrantSolutions. The fillable PDF version of the form SSA-4570 act as a backup collection instrument in case the Web-based Reporting System becomes inaccessible due to resource or technical issues, or during a PABSS T&TA contract transition.

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 could not gather the information needed to support policy and program investment, inform the strategies and approaches leading to improved employment outcomes, and administer and report on the programs ability to meet the needs of SSDI beneficiaries and SSI recipients. PABSS grantees collect this information at the point when a beneficiary seeks assistance and completes the requested services. Because we collect this information annually as part of our agreement with the P&A organizations, 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 February 26, 2026, at 91 FR 9671, and we received no public comments. The 30-day FRN published on April 24, 2026 at 91 FR 22195, 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

The chart below shows the estimated annual burden for this information collection:

Method 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 (SSA-4570)	1 ⁺	1	1	1	\$1*	\$1**
Web-based Reporting System (SSA-4570)	57	1	2,400	2,280	\$55.83*	\$127,292**
Totals	58			2,280		\$127,293**

⁺We are placing a place holder for form SSA-4570, as SSA will only use the paper version of the SSA-4570 as a backup collection instrument if the Web-based Reporting System becomes unavailable. As such, we do not anticipate any respondents will use the PDF form under normal circumstances, therefore, we are including a placeholder burden here.

* We based this figure on the average Computer Systems Analyst hourly wages ([Occupational Employment and Wage Statistics](#)), as reported by Bureau of Labor Statistics 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.**

Note: As respondents either submit this information to us electronically through the Web-based Reporting System, or via an emailed PDF, we have no travel time associated with this information collection.

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)**
57	1	90	86	\$2,928***

***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 **2,400** 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 **2,280** burden hours (reflecting SSA management information data), which results in an associated theoretical (not actual) opportunity cost financial burden of **\$80,563**. 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 **\$128,966**. 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-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	\$0*
Quantifiable IT Costs	Any additional IT costs	\$0*
Other	PABSS T&TA contractor funding allocated to form and system maintenance including technical assistance, onboarding, minor changes, and annual data collection and reporting activities.	\$128,966
Total		\$128,966

* 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. 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 2023, the burden was 4,199 hours. However, we are currently reporting a burden of 2,280 hours. This change stems from a change in methods utilized to calculate the number of respondents. The reduction in burden is solely attributable to the updated, data-driven estimation approach and not to any programmatic change in reporting requirement. In addition, PABSS grantees complete the PPR on behalf of the SSDI and SSI recipients, so we believe that beneficiaries should not have been included in the previous clearance, we are removing the beneficiaries from the burden chart. These figures represent current Management Information data.

* Note: The total burden reflected in ROCIS is **2,366**, while the burden cited in #12 of the Supporting Statement is **2,280**. This discrepancy is because the ROCIS burden also reflects learning costs. In contrast, the chart in #12 of the Supporting Statement reflects actual burden.

16. Plans or Publication Information Collection Results

SSA will not publish the results of the information collection.

17. Displaying the OMB Approved Expiration Date

For the **fillable PDF Form SSA-4570**, we will not publish 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.

For the **Internet version** of form SSA-4570, 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.