Supporting Statement for the Information Collection Tools for the State of Georgia's Criminal Justice Coordinating Council's (CJCC) Evaluation of the Implementation of the SSI/SSDI Outreach, Access, and Recovery (SOAR) Model in County Jails
OMB No. 0960-0833

A. Justification

1. Introduction/Authoring Laws and Regulations

SSA is in a cooperative agreement with the State of Georgia's Criminal Justice Coordinating Council (CJCC) to conduct a small-scale intervention and evaluation of the Supplemental Security Income (SSI) and Social Security Disability Insurance (SSDI) Outreach, Access, and Recovery (SOAR) model in county jails with inmates with serious and persistent mental illness (SPMI) across the state. *Section 1110(a)* of the *Social Security Act* authorizes the Commissioner of Social Security to fund research and demonstration projects that address the prevention and reduction of dependency.

In addition to SSA, CJCC partnered with: (1) Applied Research Services (ARS), (2) the Georgia Department of Behavioral Health and Developmental Disabilities (DBHDD), and (3) four county jails to implement the program. A division of the CJCC, Georgia Statistical Analysis Center (GASAC), supports all data collection and analysis with the goal of assisting the CJCC's planning and development of strategies to improve the criminal justice system in Georgia. For this evaluation SSA is collecting program data for research and evaluation purposes. Through the cooperative agreement, SSA is overseeing all data collection activities. SSA, CJCC, and the other program collaborators are the primary users of the collected data.

2. Description of Collection

For this intervention, investigators hypothesized that untreated mental illness and repeated psychiatric crises may be a factor in jail recidivism. Therefore, the ability for inmates with SPMI to receive SSI/SSDI and attendant insurance benefits may help them obtain treatment and thus help to mitigate their criminal tendencies. This intervention connects respondents in four county jails identified as having SPMI to Medicaid Eligibility Specialists (MES) hired and trained by the Georgia DBHDD, who help them apply for SSI and SSDI. Respondents in two of the four counties (Fulton County Jail and Cobb County Jail) also have the option of working with a Forensic Peer Mentor (FPM), a formerly incarcerated individual who is familiar with resources that may help participants increase their quality-of-life post incarceration and avoid recidivism. SSA works with the two DBHDD MESs who are serving the participants over the total life of the project. To maximize the likelihood of the SSI/SSDI application approval, the MES employs the SOAR method, which uses in-depth medical and personal summaries of disability to facilitate the SSI/SSDI application process.

Recruitment

The SOAR project team identifies and enrolls individuals with SPMI in four participating county jails in Georgia. Potential participants learn about the SOAR intervention and

evaluation through direct contact with jail mental health personnel and the Medicaid Eligibility Specialist (MES) assigned to each jail. Jail staff identify individuals who may meet the eligibility criteria and refer them to the MES. The MES then meets with each individual to explain the SOAR program, describe available services, and review the research component.

The recruitment process includes the following steps:

- Jail mental health personnel review individuals in custody to identify those who meet the program's SPMI eligibility criteria.
- Jail personnel send the names of potentially eligible individuals to the MES assigned to the jail.
- The MES meets with each individual in a private or semi-private setting to explain the SOAR program, confirm eligibility, and determine whether the individual is interested in participating in the research component.
- During the meeting, the MES explains the purpose of the SOAR program, describes the SSI/SSDI application process, reviews the voluntary nature of research participation, and answers the individual's questions.

Participation is voluntary, and individuals may receive SOAR services even if they choose not to participate in the evaluation. Some eligible individuals may experience challenges that affect their ability to participate in recruitment activities, including acute psychiatric symptoms, difficulty concentrating, medication changes, or stress related to incarceration. Others may be released unexpectedly before completing all data-collection activities, requiring the project team to conduct additional follow-up efforts in the community.

If the individual agrees to participate in the evaluation, the MES obtains written consent using the paper consent form, administers the initial enrollment survey, and collects the required information.

At Fulton County Jail and Cobb County Jail, participants may also receive support from a Forensic Peer Mentor (FPM). The FPM helps participants identify and access resources that may improve their quality of life after release and reduce their likelihood of returning to jail.

Researchers collect data from participant surveys to evaluate and study the impact of the intervention. Through the data collected through these surveys, along with administrative data from SSA, the State of Georgia, participating counties, and DBHDD hope to address the following research questions:

- Does connection to a SOAR-trained specialist increase the likelihood that a person with SPMI in jail will be approved for SSI/SSDI benefits?
- If a person with SPMI receives SSI/SSDI benefits, do they connect to treatment resources they may not have accessed otherwise?
- If a person with SPMI connects to and engages with needed treatment resources, are they able to achieve mental health stabilization and remain out of jail?

The surveys provide information that SSA program records do not capture, including participants' health status, quality of life, financial circumstances, and experiences with the application process and supportive services.

1. **Consent form and initial enrollment survey:**

   - **Consent form**: As mentioned above, before participants take part in the research, the MES meets with them in person, provides a paper consent form, and asks them to review and sign it. SSA requires a wet signature on the consent form; therefore, we do not accept an electronic signature. The consent form explains:

     - The voluntary nature of the study
     - What personal information will be requested
     - How the information will be used
     - Safeguards in place to protect participant data
     - Participant rights, including the right to withdraw at any time
     - Contact information for questions about participant rights

     Each consent form includes a participant identification number that researchers use on all data-collection tools. The consent form is the only document that contains both the participant's identifying information and study identification number.

   - **Initial enrollment survey**: The MES invites program candidates to participate in a one-time initial enrollment survey. The survey asks about participants' quality of life, mental health status, financial independence, and experiences with the SSI/SSDI application process. Participants complete the paper survey immediately after the MES completes their SSI/SSDI application. Participants may ask for help reading or completing the survey, but they will not need information from outside parties to respond. The initial enrollment survey collects qualitative information.

2. **Follow-up Surveys:**
   The CJCC research analyst administers one follow-up survey to participants for evaluation purposes six months after they receive benefits. The analyst uses the same survey instrument for all follow-up surveys.

   Initially, participants receive access to the survey online. If the CJCC research analyst does not receive a response within two to three weeks, the analyst offers participants the option to complete the survey by telephone. The follow-up survey repeats selected questions from the initial enrollment survey to measure changes in participants' quality of life, mental health status, and financial independence. It also asks participants who were denied benefits but continued working with an MES to describe their experience with the specialist. When available, the survey also asks participants about their experience with a Forensic Peer Mentor (FPM).

Participants may decline to answer any survey question and may stop the survey at any time, including after they have started it. The IRB-approved informed consent form explains these rights.

Update: To date, we began the initial enrollment survey and informed consent phase of this intervention and will continue to collect them through the end of the project. We also began administering the follow-up survey phase of this intervention and will continue to do so through the end of the project period.

Note: SSA initially expected each MES to serve approximately 45 participants annually. However, delays in staffing, federal review processes, and multi-agency implementation requirements made that projection unattainable. Consequently, the project will enroll a total of 60 participants over the full project period, rather than 90 participants we anticipated to enroll annually. This revised estimate reflects the additional time needed to establish the jail-based SOAR infrastructure, and onboard fully trained staff.

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

Psychological Cost #1:

- **Requirement for Program:** The initial information collection instrument is the consent form, which explains the purpose and activities involved if the individual agrees to participate. The MES provides SOAR services to the individual regardless of whether they agree to participate in the evaluation.

- **Psychological Cost:** As the MES works for the DBHDD, the potential participant may feel the need to agree to participate in the evaluation in return for the MES providing help with their SSI/SSDI application. In addition, while the MES instructs individuals that participation in the evaluation is voluntary and that services are not contingent on participation, individuals may still experience stress or hesitation when reviewing and signing a consent form in a jail setting, particularly if they have limited trust in institutional processes.

Psychological Cost #2:

- **Requirement for Program:** Respondents complete the baseline survey in the same session as the consent form, which explains the purpose and activities involved if the individual agrees to participate. In addition, the baseline enrollment survey asks an individual to provide personal information about themselves.

- **Psychological Cost:** Respondents may experience discomfort or stress when answering questions about personal health, mental health, functional limitations, financial circumstances, or quality of life. Some respondents may view these questions as intrusive or may feel uncomfortable sharing personal information while in custody. Respondents with SPMI may also find it difficult to concentrate, recall information, or discuss sensitive experiences. These concerns may cause a respondent to skip questions, stop completing the survey, or withdraw consent to

participate in the evaluation. Therefore, the IRB-approved informed consent form explains that respondents may decline to answer any question and may stop participating at any time without affecting their access to SOAR services.

Psychological Cost #3:

Requirement for Program: The follow-up survey asks an individual to provide personal information about themselves. We administer the survey once, six months after participants receive benefits.

- **Psychological Cost:** While we provide the individual with the same information each time the individual receives the follow-up survey to remind them of their enrollment, as well as the purpose and goals of the evaluation, participants may experience psychological discomfort when completing the follow-up surveys because the questions ask them to reflect on personal circumstances, including mental health, quality of life, financial independence, treatment access, SSI/SSDI application outcomes, and experiences following release from jail. We administer the survey once, six months after participants receive benefits. The survey may still remind some participants of difficult experiences related to incarceration, psychiatric symptoms, financial instability, benefit denials, or challenges accessing services. Some respondents may experience stress when participating in the information collection due to the setting and circumstances of incarceration. In addition, individuals in custody sometimes have limited trust in institutional processes, which may create hesitation when asked to share information, even when participation is voluntary.

We understand that these psychological costs may cause some respondents to take additional time to complete the information collection or to decide not to participate in the evaluation activities. Because participation in the research portion of the program is voluntary, individuals may still receive SOAR services from the MES even if they choose not to complete the information collection tools. We have taken these potential psychological costs into account when estimating the burden described in Item #12 below.

The respondents are individuals with serious and persistent mental illness incarcerated in county jails in the state of Georgia.

3. Use of Information Technology to Collect the Information

GASAC collects survey data through Alchemer, a secure, cloud-based survey platform that CJCC uses for survey-based data collection. CJCC hosts Alchemer and its backend database on its Azure cloud servers. CJCC's IT department maintains this server infrastructure under its Microsoft 365 Enterprise Licensing Agreement (ELA). The ELA requires CJCC to store all data and supporting infrastructure, including backups and redundancies, on Azure Cloud Services located within the continental United States. Only authorized GASAC research analysts and database administrators may access Alchemer. These users must authenticate with their CJCC Windows login credentials and two-factor authentication.

- **Consent form:** When the MES meets with the participant in jail, the participant reviews and signs the informed consent form on paper. The MES scans the signed form and uploads it to Government-to-Government Services Online (GSO), SSA's secure document-submission portal for transmitting documents between state partners and SSA. GSO encrypts documents during transmission and stores them securely for access by authorized project staff only. The MES also stores the original paper consent forms in a locked file cabinet at the DBHDD regional office.

- **Initial enrollment survey:** After gathering the information needed to complete the SSI/SSDI application, the MES administers the initial enrollment survey in person. The MES then manually enters participants' survey responses into the GASAC Alchemer platform for aggregate analysis and evaluation.

- **Follow-up survey:** GASAC distributes follow-up surveys through its Alchemer platform by sending participants a secure survey link to the email addresses provided on their consent forms. If a participant does not respond within two to three weeks, a GASAC research analyst contacts the participant by telephone and administers the survey. The analyst enters the participant's responses into the Alchemer platform immediately after completing the telephone survey.

In this way, we obtain responses electronically from participants, with the exception of the paper Informed Consent.

4. Why We Cannot Use Duplicate Information

For the evaluation of the SOAR intervention, the nature of the information we collect and the manner in which we collect it precludes duplication. SSA does not utilize another collection instrument to obtain similar data. Surveys which the CJCC Research Analysts administer to participants provide valuable information that the evaluation team cannot gather through SSA's program records.

The purpose of the initial enrollment survey and follow-up surveys is to gather point-in-time information about the respondents' quality of life, mental health status, level of financial freedom, and feelings about the SSI/SSDI application process, aiming to evaluate potential changes over time. The survey data is available in program data; however, we need to collect it for the survey to show the current status (point-in-time data) of the participants.

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

If we did not conduct the intervention, we would be unable to answer questions about the effectiveness of outreach and assistance provided to individuals with SPMI who are incarcerated in county jails. The initial enrollment survey is a one-time collection necessary to conduct a credible small-scale evaluation. The CJCC SOAR evaluation

team cannot obtain these data from other sources, and the survey provides more comprehensive information than program records alone. Because we administer the initial enrollment survey only once, we cannot collect it less frequently.

The follow-up surveys collect information that the evaluation team cannot obtain from program records alone. We administer follow-up surveys once six months after the participants receive benefits to obtain a more thorough assessment. Conducting fewer follow-up surveys would limit MESs' ability to respond to participant feedback in real time. The initial survey supports this timely response, while the follow-up surveys provide information on participants' experiences over time. Collecting two follow-up surveys six months apart allows sufficient time for SSI/SSDI benefits to affect participants' lives and enables researchers to assess how receipt of benefits influences outcomes.

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 August 27, 2026, at 91 FR 55421, and we received no public comments. The 30-day FRN published on October 29, 2026, at 91 FR 68213. If we receive any comments in response to this Notice, we will forward them to OMB.

We consulted with the professionals from the State of Georgia, and their contractor, ARS, to contribute to the design of the information collection effort for this evaluation.

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 initial enrollment and follow-up surveys include broad, multiple-choice questions about participants' financial independence, as well as more specific questions about their mental health, ability to address mental health concerns, quality of life, and other potential effects of benefit acquisition or program participation. The evaluation team needs the initial enrollment and follow-up surveys to assess the intervention's effects on participants' financial well-being, mental health, and other quality-of-life indicators. The surveys collect information that the evaluation team cannot obtain directly from other sources. Respondents may decline to answer any question they consider too private or sensitive.

To encourage participation, the questionnaire introduction reminds respondents that the study team will keep their responses private and will not collect their names or other identifiable information. Nevertheless, some respondents may view these questions as overly invasive. This perception may lead some individuals to stop completing the survey or withdraw their consent to participate in the evaluation, as permitted under the IRB-approved informed consent form.

12. Estimates of Public Reporting Burden

Please see the burden chart below:

Method of Completion	**Number of Respondents**	**Frequency of Response**	**Average Burden Per Response (minutes)**	**Estimated Total Annual Burden (hours)**	**Average Theoretical Cost Amount (dollars)***	**Total Annual Opportunity Cost (dollars) ******
Initial Enrollment Survey (Paper)	10[+]	1	19	3	$14.27*	$43**
Informed Consent (Paper)	10[+]	1	10	2	$14.27*	$28**
Follow-up Survey (Internet or Telephone)	60[+]	1	23	23	$14.27*	$328**
Totals	**80[+]**			**28**		**$399****

[+] These figures reflect the remaining respondents for these information collections from the total respondents who are taking part in this intervention.

* We based this figure on average disability payments ($14.27) based on SSA's current FY 2026 data (Effect of COLA on Average Social Security Benefits).

** This figure does not represent actual costs that SSA is imposing on individuals; rather, these are theoretical opportunity costs for the additional time respondents will spend to complete the information collection. **There is no actual charge to respondents to complete the information collection**.

We did not include travel or wait time because MES staff meet respondents in person to obtain consent and administer the initial enrollment survey. GASAC distributes the follow-up surveys through its Alchemer platform by sending participants a secure survey link to the email addresses they provide on their consent forms. Respondents can complete the surveys electronically. If a participant does not respond within two to three weeks, a GASAC research analyst contacts the participant by telephone and administers the survey.

We calculated the following Learning Cost time burden based on the estimated time and effort we expect respondents 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)*** **
60	1	15	15	$214***

*****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 the prior three years of conducting this information collection. Per our management information data, we believe that **10, 19, and 23** minutes accurately shows the average burden per response for reading the instructions, gathering the facts, and answering the questions. Based on our current management information data, the current burden information we provided is accurate. The total burden for this ICR is **28** burden hours (reflecting SSA management information data), which results in an associated theoretical (not actual) opportunity cost financial burden of **$613**. 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 **$2,028**. 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	$45
Distribution, Shipping, and Material Costs for the Form	Distribution + Shipping + Material Cost	$0**
CJCC Research Analyst administering the information collections	CJCC Evaluation team processing time	$1,586
Full-Time Equivalent Costs	Out of pocket costs + Other	$0*

	expenses for providing this service	
Systems Development, Updating, and Maintenance	GS-9 employee x man hours for development, updating, maintenance	$0***
Quantifiable IT Costs	Alchemer database platform	$397
Total		**$2,028**

* We have inserted a $0 amount for cost factors that do not apply to this collection.

**There is no cost to the federal government as CJCC administers the surveys as part of SSA's agreement with them; therefore, we are using a $0 cost for this.

*** CJCC's IT department maintains this server infrastructure under its Microsoft 365 Enterprise Licensing Agreement; therefore we are using $0 cost for this.

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 agreement with CJCC.

15. Program Changes or Adjustments to the Information Collection Request

When we cleared this ICR in 2023, the burden was 113 hours. However, we are currently reporting a burden of **28** hours. This change stems from reducing the expected number of participants from 90 annually to 60 total for the duration of the project, as well as a reduction in the number of follow-up surveys from two administrations to one. Because the burden estimates are directly tied to the number of individuals completing the consent form and survey instruments, a smaller respondent pool results in a corresponding decrease in total time burden. We note that we need to reduce the overall respondent pool based on overall delays in staffing, delays in the federal review processes, and changes to the multi-agency implementation requirements.

*Note: The total burden reflected in ROCIS is **48**, while the burden cited in #12 of the Supporting Statement is **28**. This discrepancy is because the ROCIS burden also reflects the learning costs. In contrast, the chart in #12 above reflects actual burden.

16. Plans for Publication Information Collection Results

Once we finish administering this project, the team will analyze, tabulate, and report the information collected to evaluate the intervention. After SSA reviews the findings, CJCC will publish a written report on its website to communicate program results. The report will not identify participating jails or individual participants. At the conclusion of the six-year grant period, the team will finalize and publish the report. The team will also present the results and methodology to partners, interested parties, and stakeholders.

Time schedule for analysis and reporting:

SSA will analyze survey responses semiannually. Data collection began on September 30, 2023, when individuals completed the initial enrollment survey after providing consent to participate. We will conclude the data collection on September 30, 2027, after

the most recently enrolled participants complete their follow-up surveys.

The survey collection and reporting schedule are as follows:
Data collection: Summer 2023 through fall 2027
Data analysis: Summer 2024 through fall 2027
Final report: Fall 2027

17. Displaying the OMB Approval 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)*.