Addendum to the 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

Minor Revisions to the Collection Instruments

SSA is making the following revisions:

- **Change #1**: We will update the CJCC Consent for Participation in Research Form to identify Samuel Gonzales as Principal Investigator.

  Justification #1: Stefanie Lopez-Howard is no longer the Principal Investigator, and Samuel Gonzales has assumed this role.

- **Change #2**: We revised the CJCC project's enrollment goal from 300 participants to 60 participants over the project period.

  Justification #2: Delays in staffing, federal review processes, and multi-agency implementation requirements made the original enrollment projection unattainable. Consequently, the project will enroll 60 participants over the full project period rather than 90 participants each year. We have updated #2 of the Supporting Statement to reflect this revised enrollment goal.

NOTE: We updated the burden chart in #12 of the Supporting Statement to reflect the revised number of respondents.

Terms of Clearance

OMB placed the following Terms of Clearance on this Information Collection when they last approved it on 10/31/2023:

- **Term: The agency added a Supporting Statement B. Consistent with the agency's description of this collection, the agency is advised that conclusions from this preliminary qualitative research may not be generalizable.**

  SSA response: The CJCC project is a limited, minimal study designed to test the intervention on a small scale and assess whether it warrants broader implementation and more rigorous evaluation. The project includes a limited number of sites within one state; therefore, the evaluation will not generalize findings to other populations, settings, or jurisdictions. Instead, the evaluation will examine outcomes associated with the intervention among participating individuals and sites. These findings will help to determine whether the intervention merits wider deployment and future study.

Public Comments on the Information Collection

60-Day Comment Period Federal Register Notice (FRN):
The 60-day Comment Period began on August 27, 2026 and ended on October 26, 2027, at 11:59pm. We received **1** public comments on the 60-Day Comment Period FRN from **1** commenter. We acknowledge and appreciate the thoughtful feedback from the commenter, and we responded to the comments below:

- **Comment #1:**
  The commenter suggests that SSA should explain its valuation methodology. The commenter opines that several collections use average disability benefit payments as an hourly proxy for the opportunity cost of respondents' time, while another averages disability payments and worker wages. The commenter also states that a benefit amount is not itself an hourly wage. Therefore, the commenter requests SSA disclose the calculations and explain why these figures reasonably measure the opportunity cost of time for the populations concerned.

  SSA Response #1:
  The Paperwork Reduction Act of 1995 requires federal agencies to associate both time and monetary costs experienced by the public when accessing essential public benefit programs. To that end, OMB published a memo, M-22-10, *Improving Access to Public Benefits Programs Through the Paperwork Reduction Act,* which requires agencies to include theoretical cost burdens for information collections which only have associated time burdens. The concept here is that "time is money," so agencies should quantify the burden estimate with a theoretical monetary cost on the public.

  For SSA, in most cases the respondents for our information collections are no longer paid an hourly wage. Rather, SSA pays the respondents either in retirement benefits, or in disability payments. OMB agreed that since applicants or recipients of SSI or SSDI no longer receive an hourly wage, but receive disability payments from SSA, that SSA may use the average hourly disability payment as a theoretical hourly cost amount for these information collections. Since the respondents are applicants for SSI or SSDI Payments, we use the average hourly disability payment in lieu of an hourly wage for these respondents. We calculate the hourly theoretical wage amount for disability payments using SSA's management information (MI) data which shows the average monthly wages for disability recipients, and then we divide that amount by 160 (hours) to determine the hourly theoretical (not actual) wage amount. We increase that amount as needed annually based on new annual figures from SSA's MI data (which is publicly available).

- **Comment #2:**
  SSA should clarify the burden and respondent totals for the Georgia SOAR evaluation. The table reports 165 respondents across three instruments despite a project population of 90 individuals. Although respondents may participate in multiple collections, SSA should

distinguish unique individuals from instrument-specific counts to avoid ambiguity in the reported totals.

SSA Response #2:
As per our previously approved information collection from 2023, SSA previously indicated that we would conduct this evaluation with a total of about 90 respondents per year (with a goal of 300 total respondents). However, due to delays in staffing, federal review processes, and multi-agency implementation requirements, we have reevaluated our estimates and now expect to complete this evaluation with a total of only 60 respondents. Our revised burden chart in #12 of Supporting Statement A clearly shows the estimated respondents per information collection instrument, and also clearly explains that we are now only conducting this evaluation with 60 respondents. We believe our updated chart in #12 of the Supporting Statement accurately reports the totals to avoid any ambiguity.