

**Supporting Statement for
The Ticket to Work and Self-Sufficiency Program
20 CFR 411
OMB No. 0960-0644**

A. Justification

1. Introduction/Authoring Laws and Regulations

This information collection request (ICR) is necessary to administer the Ticket to Work (Ticket) Program authorized under Section 1148 of the *Social Security Act (Act)*. The Ticket Program provides Social Security Disability Insurance (SSDI) and Supplemental Security Income (SSI) recipients with expanded options for access to employment services; vocational rehabilitation services; and other employment-related supports, as they work to decrease dependence on Federal cash benefits. The Ticket Program transitions SSDI and SSI recipients toward independence, by allowing them to receive Social Security payments while maintaining employment under the auspices of the program.

The Social Security Administration (SSA) uses service providers, called employment networks (ENs), to support and supervise program participant progress through the stages of Ticket Program participation, such as job searches and interviews; progress reviews; and changes in ticket status. ENs can be private for-profit and non-profit organizations, as well as state vocational rehabilitation (VR) agencies. SSA and the ENs utilize a Ticket Program Manager (TPM) to operate the program and exchange information about Ticket Program participants. Through the TPM, the ENs provide updates on tasks, such as selecting a payment system or requesting payments for helping the recipient achieve certain work goals. The Ticket Program allows SSDI and SSI recipients to choose an EN service provider, who will guide and assist them in reaching their goals to obtain and retain self-supporting employment. 20 CFR 411.100-411.730 of the *Code of Federal Regulations* house the regulations for the Ticket Program, including descriptions of the information collection requirements of the program. Section 205(a) of the *Act* gives the Commissioner of Social Security the authority to establish regulations for the Social Security Administration's programs.

2. Description of Collection

SSA requires ENs to submit multiple types of Ticket Program and participant information, resulting in 13 information collection instruments (described below in categories a-i; if we do not mention a specific form number in connection with a collection, it means we require information in writing with no established form). We also increased automation of payments to ENs. ENs, including state VR agencies, provide the information requested from several of these forms through a web-based Secure Ticket Portal, in lieu of submitting forms. This Portal allows ENs to retrieve reports, and enter and submit information electronically, minimizing the use of paper forms.

SSA offers training to service providers concerning program requirements of the regulations for any information collection form listed below, and for all modalities of collection, even when there is no form. In addition, SSA offers account representatives, and a help line through our TPM to serve as an ongoing resource for any information service provider's may need. If a regulation requires the EN, state VR agency, or a recipient to notify us of something in writing, such as when they want to unassign a ticket, the TPM will accept a written statement from any one of these entities making the request. The TPM will accept the written request by regular mail, fax, or email. In some instances, ENs may also submit the information through the Portal to SSA.

a. Establishing Ticket Assignments and Ticket Use

To establish ticket assignability, prior to the recipient having the ticket assigned to an EN or using it with a state VR agency, the EN may contact the TPM to find out whether the recipient is eligible to use the ticket per *20 CFR 411.140(d)(2)*. For initial requests, the EN or state VR agency may use the Ticket Portal. No matter which method the ENs use to obtain the eligibility report, they must provide the TPM with their Dun and Bradstreet Number, as well as the recipient's SSN, and, in the case of live communication, the recipient's name.

Once the ENs establish ticket assignability, there are various ways Ticketholders may use their tickets with a service provider. Each way requires the service provider, which is either an EN or a state VR agency, to send the TPM information signifying the relationship established between the agency and the Ticketholder.

Form SSA-1370, Individual Work Plan (IWP) – Sections *20 CFR 411.140(d)(3)*, *411.150(b)(3)* and *411.325(a)*, require ENs (except state VR agencies acting as ENs) to submit an IWP to solidify a ticket assignment, or reassignment, and to inform SSA of amendments to the IWP. The IWP outlines the Ticketholder's employment goals and the services the EN agrees to provide to help meet the goals and other information as described in *20 CFR 411.465*. An EN usually uses the Ticket Portal to select and transmit the IWP information, instead of using the fillable form.

Form SSA-1365, State Agency Ticket Assignment Form – Sections *20 CFR 411.140(d)(3)*, *411.150(b)(3)* and *411.325(a)* require the state VR agency to submit information establishing the ticket assignment using the form we prescribe. This brief form is essentially a signed statement that the state VR agency developed an individualized plan for employment toward which the Ticketholder and the agency agree to work on. An EN usually uses the Ticket Portal to select and transmit the IWP information, instead of using the fillable form.

Electronic Data Sharing – Amendments to the Ticket to Work and Self-Sufficiency Program in *20 CFR 411.166* and *411.170(b)* created a new ticket status called the “Cost Reimbursement Option” for when the Ticketholder is using the ticket with the state VR agency under the traditional cost reimbursement payment method (i.e. the state VR agency is not acting as an EN). We cannot assign tickets in this status to an EN while the state VR agency has the case open. In support of this policy, we ask state VR agencies to inform us when Ticketholders work with them under this option. Instead of an individual paper form, they upload a file to the Portal monthly. This file contains the names and Social Security numbers of all the Ticketholders with whom they began working under this option during the reporting period, and the effective date of the individualized plan for employment, which signifies the date the ticket is officially in-use with the state VR agency.

- b. Requesting Ticket Unassignments and Notifying of VR Case Closures
Sections *20 CFR 411.145* and *411.325* require the recipient or the service provider who wants to take a ticket out of assignment to notify the TPM. Likewise, in connection with the regulatory amendment mentioned in a. above, to support *20 CFR 411.535(a)(1)(iii)*, the state VR agency should inform SSA when it closes the case of a Ticketholder that the state VR agency was serving under the cost reimbursement option. These notifications are important to monitor participation in the program, and to accurately reflect the ticket status of recipients who are eligible to participate in the Ticket to Work Program and the periods of service for which we may credit an EN or state VR agency.
- c. Tracking Progress
SSA may not initiate a medical Continuing Disability Review (CDR) while a recipient is using a ticket. If a Ticketholder assigned the ticket or is using the ticket with the state VR agency under the cost reimbursement option, at the conclusion of each 12-month period of ticket use, we request the recipient or the service provider certify whether the Ticketholder is making the expected progress. Months in which the ticket is in inactive status do not count towards the 12-month periods of ticket use for timely progress. There are three information collections associated with this provision.

Request to Place Ticket in Inactive Status – Section *20 CFR 411.192(b)* and *(c)* permits a Ticketholder to request in writing that SSA deactivate and reactivate the ticket during a period in which the Ticketholder becomes temporarily unable to make timely progress toward self-supporting employment. Upon receiving such a request, the TPM transmits updated information to SSA so the inactive or reactivated ticket status will take effect. This information is important so the recipients do not continue their exemption status from receiving a medical CDR while the ticket is inactive, and so they regain exempt status when we reactivate the ticket.

Form SSA-1375, Requests for Certification of Work and Educational Progress – Section 20 *CFR* 411.200(b) indicates that if SSA’s administrative records do not show the Ticketholder met the work or educational requirement for the timely progress period, the TPM will request the Ticketholders complete Form SSA-1375 to let us know whether they met the progress requirements for the period.

Note: We resend Form SSA-1375 if the Ticketholder responds with insufficient information, allowing the recipient a final opportunity to certify progress with work and earnings before an adverse decision takes effect.

Request to reenter Ticket-Use Status after Not Making Timely Progress – Section 20 *CFR* 411.210(b) requires the Ticketholder to send a written request for reinstatement to in-use status after not meeting the timely progress criteria. The TPM will decide if the Ticketholder met the applicable requirements. If so, the TPM transmits the updated ticket status change, and the recipient once again becomes exempt from a medical CDR.

d. Selecting a Payment System

Section 20 *CFR* 411.505 requires ENs to make their selection of a payment system at the time they enter into contract with SSA. Section 20 *CFR* 411.365 requires state VR agencies to send the TPM a letter telling us which EN payment system they choose when functioning as an EN. Amendments to the Ticket to Work and Self-Sufficiency Program in 20 *CFR* 411.515 allow ENs and state VR agencies acting as ENs to change their EN payment system election once in each calendar year. We use the elections and time periods they cover to identify the method of payment appropriate for compensating an EN or state VR agency when they file a request for payment under an EN payment system.

e. Reporting Referral Agreement Activity

Sections 20 *CFR* 411.400 – 411.420 explain that ENs and state VR agencies may have individual and broad-based agreements covering ENs’ referral of recipients, whose ticket assignments they hold, to state VR agencies for services. Section 20 *CFR* 411.325(d) and 411.415 require ENs to submit the agreements to the TPM for verification prior to referring recipients to the state VR agencies.

f. Requesting EN Payments

Section 20 *CFR* 411.575 requires ENs seeking milestone and outcome payments, including a state VR agency acting as an EN, to send a request for payment to the TPM for each milestone or outcome payment attained. The payment request must include evidence of the Ticketholder’s work and earnings and or other documentation as required.

Form SSA-1391 is the Employment Network Payment Request Form. An EN may submit it with a SSA-1389, SSA-1398, or SSA-1399 as necessary depending on the type of payment request. ENs usually use the Ticket Portal to select and transmit the Earnings Inquiry Request or the payment request information.

Split Payment Situations – in situations where more than one EN is eligible for a payment for the same period, per *20 CFR 411.560* and *411.581*, the ENs may submit an SSA-1401 asking the TPM to determine a split in payment or propose a split in payment, upon which the ENs have agreed. The TPM must approve the split payment percentages.

g. Reporting Periodic Outcomes

Section *20 CFR 411.325(f)* provides that ENs must prepare periodic reports about their organizations. These annual reports contain information such as staffing size and experience, and the services the EN provides Ticketholders. The Ticket Portal captures information we previously obtained from ENs about outcomes.

h. Dispute Resolution

The Ticket Program provides a mechanism for dispute resolution when disputes involve recipients, the TPM, ENs, or state VR agencies. Section *20 CFR 411.435* provides that under certain circumstances, ENs and state VR agencies that have a dispute related to an agreement between the two agencies may request the TPM to recommend a dispute resolution. Sections *20 CFR 411.615* and *411.625* provide that a recipient or EN may advance a dispute resolution request to the TPM and then to SSA.

i. EN Contract Changes

ENs must enter into an agreement with SSA per Section *20 CFR 411.320*. After becoming an EN, if an organization wishes to make changes to certain information it provided, it should make the change using the Ticket Portal.

The respondents for these collections are the ENs, and by extension, the Ticket Program participants from whom they obtain information to complete the collections.

3. Use of Information Technology to Collect the Information

We created a secure Ticket Portal, which allows our Ticket providers to electronically complete actions, and report to SSA. The Ticket Portal makes collections described in #2 above available electronically. Most of our providers use the Ticket Portal, to perform the majority of their actions and data sharing activities. SSA requires all ENs to use the Ticket Portal when updating their blank purchase agreements with SSA.

- 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. As of 2018, there are 544 ENs under contract with SSA, most of which are small businesses. The majority of ENs submit their information and data through the Ticket Portal.
- 6. Consequence of Not Collecting Information or Collecting it Less Frequently**

If we did not collect this information, we would not comply with some aspects of the Ticket to Work legislation, which may adversely affect the cost of operating the program. In addition, if SSA collected this information less frequently, we would not be able to adequately monitor activities affecting recipients within the program. These information gaps could lead to less than adequate oversight of program compliance. There are no technical or legal obstacles to burden reduction.
- 7. Special Circumstances**

To manage the Ticket to Work Program, SSA must have up-to-date information concerning ticket assignments and unassignments, and the status of tickets under the cost reimbursement option with state VR agencies. Therefore, service providers must report this information to us as close to the date of the action as possible. Quarterly reporting would be insufficient.
- 8. Solicitation of Public Comment and Other Consultations with the Public**

The 60-day advance Federal Register Notice published on October 22, 2018, at 83 FR 53352, and we received no public comments. The 30-day FRN published on December 26, 2018 at 83 FR 66330. If we receive any comments in response to this Notice, we will forward them to OMB.
- 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**

This 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)
a) 20 CFR 411.140(d)(2) – Interactive Voice Recognition Telephone	6,428	1	2.5	268
a) 20 CFR 411.140(d)(2) – Portal	25,713	1	1.25	536
a) 20 CFR 411.140(d)(3) – Virtual Job Fair Registration-Employment Networks*	0	0	0	0
a) 20 CFR 411.140(d)(3); 411.325(a); 411.150(b)(3) – SSA-1365	948	1	15	237
a) 20 CFR 411.140(d)(3); 411.325(a); 411.150(b)(3) – SSA-1365 Portal	3,792	1	11	695
a) 20 CFR 411.140(d)(3); 411.325(a); 411.150(b)(3) – SSA-1370	21,600	1	60	21,600
a) 20 CFR 411.140(d)(3); 411.325(a); 411.150(b)(3) – SSA-1370 Portal	5,868	1	10	978
a) 20 CFR 411.166; 411.170(b) – Electronic File	40,324	1	5	3,360

Submission				
b) 20 CFR 411.145; 411.325	2,494	1	15	624
b) 20 CFR 411.145; 411.325 – Portal	7,481	1	11	1,372
b) 20 CFR 411.535(a)(1)(iii) – Data Sharing/Portal	8,505	1	5	709
c) 20 CFR 411.192(b)&(c)	6	1	30	3
c) 20 CFR 411.200(b) – SSA-1375	120,000	1	15	30,000
c) 20 CFR 411.200(b) – Portal	64,824	1	5	5,402
c) 20 CFR 411.210(b)	41	1	30	21
c)20 CFR 411.200(b) Wise Webinar Registration Page	4,812	1	3	241
c) 20 CFR 411.200(b) Virtual Job Fair Registration*	0	0	0	0
d) 20 CFR 411.365; 411.505; 411.515	6	1	10	1
e) 20 CFR 411.325(d); 411.415**	1	1	480	8
f) 20 CFR 411.575 – SSA- 1389; SSA-1391; SSA-1393*; SSA- 1396*; SSA-1398; SSA-1399	2,805	1	40	1,870
f) 20 CFR 411.575 – Portal	42,075	1	22	15,428
f) 20 CFR 411.575 – Automatic Payments*	0	0	0	0

f) 20 CFR 411.560 – SSA- 1401	100	1	20	33
g) 20 CFR 411.325(f)	1,371	1	45	1,028
h) 20 CFR 411.435; 411.615; 411.625	2	1	120	4
i) 20 CFR 411.320 – SSA-1394	52	1	10	9
i) 20 CFR 411.320 – SSA-1394 Portal	158	1	5	13
Totals	359,406			84,440

* Note: We removed four data collection tools from this clearance package: (1) the Virtual Job Fair Registration Form; (2) the Automatic Payment Request Form; (3) SSA-1396: Earnings Inquiry Request Form; and (4) SSA-1393: Employment Network Supplemental Earnings Statement. We no longer conduct virtual job fairs or require a form submission for enrollment in automatic payments. Additionally, we now confirm earnings via the secured Ticket Portal, instead of a form (see #15 below).

**Note: We have not received any responses since 2011.

The total burden for this ICR is **84,440** hours. We based these figures on current management information data. This figure represents burden hours, and we did not calculate a separate cost burden.

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

SSA carries out these information collections as part of the TPM's contract and embeds them in their various workload processes. The annual cost to the Federal Government is approximately \$7,000,000. This estimate accounts for costs from the following areas: (1) designing, printing, and distributing the form; (2) SSA employee (e.g., field office, 800 number, DDS staff) information collection and processing time; and (3) systems development, updating, and maintenance costs.

15. Program Changes or Adjustments to the Information Collection Request

When we last cleared this IC in 2017, the burden was 85,072 hours. However, we are currently reporting a burden of 84,440 hours. This change stems from three factors: (1) we removed four collection tools mentioned in #12 above; (2) a decrease in the number of responses from 24,000 to 4,812 on the Wise Webinar

Registration Package; and (3) an increase in the number of responses from 112,362 to 120,000 on the SSA-1375. There is no change to the burden time per response. Although the number of responses changed, SSA did not take any actions to cause this change.

16. Plans for Publication Information Collection Results

SSA will not publish the results of these information collections.

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).

B. Collection of Information Employing Statistical Methods

SSA does not use statistical methods for these information collections.