

**Justification for Non-Substantive Changes for Disability Case Development
Information Collections By State Disability Determination Services On Behalf Of
The Social Security Administration**

**20 CFR, Subpart P, 404.1503a, 404.1512, 404.1513, 404.1514, 404.1517, 404.1519; 20
CFR Subpart Q, 404.1613, 404.1614, 404.1624; 20 CFR, Subpart I, 416.903a,
416.912, 416.913, 416.914, 416.917, 416.919; and 20 CFR Subpart J, 416.1013,
416.1024**

OMB No. 0960-0555

Terms of Clearance:

OMB placed the following Terms of Clearance on the approval dated 2/16/23:

The agency substantially modified the instruments and supporting statement associated with this collection to reflect the adoption of Disability Case Processing System DCPS2 system and the resultant standardization of CE notices and forms. Prior to triannual reapproval, the agency will offer to OMB a briefing on any outstanding non-standardized (i.e. DDS generated) forms or notices associated with this information collection.

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SSA Response: We are submitting this Change Request within a year of the OMB approval to satisfy this Term. As per this Term, we have updated the information collections under this ICR to implement the agreed-upon changes. We are now conducting the required Change Request to ensure these updated collection instruments are accurately recorded in ROCIS.

In the last Change Request for 0960-0555, which OMB approved on April 13, 2023, we updated our emergency guidance to provide information security instructions and scheduling requirements for all telehealth consultative examinations (THCE) conducted after the public health emergency ended on May 11, 2023. At that time, we:

- Added the type of THCE to the call script and agreement form;
- Added questions to address the claimant's technology requirements to the call script and agreement form;
- Removed due process language from the agreement form; and
- Simplified the Privacy Act statement on the agreement form.

Since we implemented these changes, we have drafted policy for THCE that incorporates the emergency guidance into the POMS. As part of that policy, we have updated the existing THCE Call Script and THCE Agreement Form.

The agency is in the process of reviewing the forms in this collection, creating separate information clearances for forms sent to educational sources and those sent to nonmedical sources. We expect to complete this process by the next triennial review and will offer the required briefing on any outstanding DDS-generated forms or notices remaining at that time.

Revisions to the Collection Instrument

- **Change #1:** We have created individualized agreement forms and scripts as follows:
 - Adult,
 - Adult with a Legal Guardian, and
 - Child.

Justification #1: We created individualized agreement forms and scripts, because individualized forms simplify the user experience for our claimants by customizing the information presented, thereby making it easier for them to understand what we are asking them to agree to.

- **Change #2:** We are updating the existing THCE Agreement Call Script and THCE Agreement Form as follows:
 - Added a question about adult identification,
 - Reorganized the agreement form for better usability, and
 - Updated the language throughout for consistency with the Disability Case Processing System (DCPS) templates.

Justification #2: We are updating the script and form to align with policy and DCPS functionality.

Updated Burden Information

We expect it will take approximately 5 minutes for an individual to read and understand the letter, write in the requested information, and mail the completed document. We anticipate an equal burden for reading the script over the phone and for mailing the letter. Since we implemented our emergency guidance to permit the use of alternative video technology to conduct video CEs, the number of respondents continues to increase. Consequently, the burden for this collection has increased as follows:

CE Claimant Telehealth CE Call Script/Agreement Form

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)**
CE Claimant Telehealth Call Script/Agreement Form*	128,248	1	5	10,687	\$12.81**	\$136,900***

* We are not able to provide separate burden information for the script and form.

Therefore, the burden information provided is based on data for the script and form combined.

** We based this figure on average DI payments, as reported in SSA's disability insurance payment data (<https://www.ssa.gov/legislation/2023factsheet.pdf>).

*** 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 the information collection request has increased to **4,560,834 hours** due to the burden increase for the video telehealth call script and agreement form.

SSA will implement these revisions upon OMB's approval.