

Privacy Impact Assessment

SSA Functional Assessment Study System

- **Name of project**

SSA Functional Assessment Study System

- **Describe the information we collect, why we collect the information, how we use the information, and with whom we share the information.**

The Social Security Administration's (SSA) Office of Disability Programs (ODP) is sponsoring a Functional Assessment Study. The National Institutes of Health (NIH), Clinical Research Center, Rehabilitation Medicine Department (CRC/RMD), will conduct this study to explore a new automated claimant-reported method of functional assessment to improve our disability determination process.

Study participants are applicants for Social Security disability benefits (claimants) and two of their health care providers (primary medical providers and supplementary health care providers). Participation in this study is voluntary. Claimants and their health care providers who choose to participate will receive a small payment.

We will use computerized adaptive testing (CAT) using the Calibration Study Management System (SMS) to perform this study. SMS is a web-based system designed to administer and track study questionnaires.

NIH CRC/RMD subcontracted with Boston University Health and Disability Research Institute (BU-HDRI) to develop CAT instruments and to develop specific questions for two health domains: Physical Demands and Interpersonal Interactions. NIH CRC/RMD and BU-HDRI will conduct a calibration study to test the questions developed for the two domains.

BU-HDRI sub-contracted with Westat, an external survey center, to assist with collecting data. Westat built the CAT Calibration SMS to collect information from the study participants. Westat will house the CAT Calibration SMS. This system is comprised of two discrete modules, the core SMS and a questionnaire delivery system (QDS):

- The SMS module prescreens, enrolls and tracks participants, protects and encrypts data, and delivers questionnaires.
- The QDS delivers questionnaires to system users. These questionnaires are administered either by a Westat telephone interviewer or are completed directly by participants via the Internet using a web-based application.

The SMS will store, process, and transmit information related to the study, including respondent and/or survey data and reports, and other electronic and hardcopy information.

Westat will collect information from claimants and the claimants' health care providers about the claimant's functional ability (mobility and interpersonal interactions and relationships).

NIH CRC/RMD and BU-HDRI will use the functional information collected to develop computer adaptive testing tools. BU-HDRI will prepare a final report for NIH CRC/RMD and SSA.

We collect information from the claimants and the claimants' health care providers to process Social Security disability claims. Through NIH CRC/RMD and BU-HDRI, ODP will provide Westat with some claims-related personally identifiable information (PII) that we collected when the claimants applied for Social Security disability benefits. We will provide Westat with records that contain information such as:

- Name
- Age
- Sex
- Address
- Social Security number
- Email Address
- Impairment Allegations

Westat will randomly select participants for two study groups, which will be divided into two domains: Physical Demands and Interpersonal Interactions. Westat will collect information from the study participants for NIH CRC/RMD and BU-HDRI to conduct a calibration study to test the two CAT domains. The study results will be used to determine if CAT domains can assist us in our disability determination process.

Westat will use the information we provide about the claimant to:

- contact the claimant to invite them to participate in the study,
- identify the claimant's eligibility to participate, and
- mail a pre-notification package to randomly selected claimants.

The claimant will provide Westat with the names, addresses, and telephone numbers of the primary and secondary care providers. Westat will use this information to:

- establish contact with the health care providers to invite them to participate in the study, and

- mail them advance letters with information pertaining to the study.

Westat will collect functional information, such as mobility and interpersonal interactions and relationships, to develop computer software to improve our disability determination process. The software is intended to improve our speed when processing disability claims and more comprehensively capture functional information.

Westat will share the information it collects from the study participants with BU-HDRI in non-identifiable form. BU-HDRI will conduct analyses to finalize question banks. Question banks are collections of questions that the CAT tool will use when eliciting information from claimants. BU-HDRI will use the data Westat collected to conduct statistical analyses and to develop a final report for NIH CRC/RMD and SSA.

We will not disclose any information defined as “return or return information” under 26 U.S.C. § 6103 of the Internal Revenue Code (IRC) unless authorized by statute, the IRC, the Internal Revenue Service (IRS), or IRS regulations.

- **Describe the administrative and technological controls we have in place to secure the information we collect.**

There is comprehensive IT Security Policy that provides technological and administrative controls over this process to ensure the electronic housing of records is controlled. Logical access is strictly limited to need to know and is supported by a separation of duties policy and strict adherence to least privilege access allowances.

We annually provide authorized individuals with appropriate security and privacy awareness training that includes reminders about the need to protect personally identifiable information (PII) and the criminal penalties that apply to unauthorized access to, or disclosure of PII. Furthermore, authorized individuals with access to databases maintaining PII must annually sign a Systems Sanctions Violations – Agency Policy and Acknowledgment Statement, acknowledging their accountability for inappropriately accessing or disclosing such information.

Additional access controls include the use of armed security guards that control entrances and exits to buildings housing the original records and the use of access controls such as personal identification numbers and passwords to gain access to records that are maintained electronically.

- **Describe the impact on individuals’ privacy rights.**

The agency collects information only where we have specific legal authority to do so. When we collect personal information from individuals, we advise them of our legal authority for requesting the information, the purposes for which we will use and disclose the information, and the consequences of their not providing any or all the requested information. Individuals can then make informed decisions as to whether they should provide the information.

- **Do we afford individuals an opportunity to consent to only particular uses of the information?**

No. Westat staff advises participants that the information collected from them and their health care providers will be used for research purposes only. We advise individuals that we will not disclose this information without their prior written consent unless we have specific legal authority to do so (e.g., per the Privacy Act).

- **Does the collection of this information require a new system of records under the Privacy Act (5 U.S.C. § 552a) or an alteration to an existing system of records?**

No. We have established systems of records that govern the information we collect, use, and maintain for business purposes through this system and its various sub-systems. For example:

- [*Disability Insurance and Supplemental Security Income Demonstration Projects and Experiments System, 60-0218.*](#)

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